SAFEGUARDING AND CHILD PROTECTION POLICY

The DfE has updated its statutory guidance on 'Keeping children safe in education'. The 2023 version of the guidance will come into force on 1 September 2023. This policy and its appendices has been created in line with the updated guidance and will be implemented from September 2023.

THIS POLICY APPLIES TO THE HOPE SENTAMU LEARNING TRUST BOARD, THE CENTRAL TEAM, AND ALL TRUST SCHOOLS/ACADEMIES

Document Management	
Updated Policy Approved	July 2023
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Version	2.2
Approving Committee	Trust Board

Contents

Policy Updates

Date	Page	Policy Updates
April 2021	Whole policy	NEW Document
October 2021	6	5.1 - Correction made to the terminology
September 2022	Whole policy	Update made to the terminology
July 2023	Whole policy	Formatting, including **Figure 1** redesign
July 2023	Whole policy	Change of wording: 'children missing from education' changed to 'children absent from education'
July 2023	Whole policy	Wording updated from "LGBT" to "LGBTQ+" throughout
July 2023	4	'Important Contacts' page moved and is now incorporated into the Localised Procedures in **Appendix 5** and Trust Director of Safeguarding added to the contacts list
July 2023	5	Minor changes to the Statement of Intent for clarity of the purposes of the policy
July 2023	6	1 - Section renamed from "Aims" to "Policy Objectives" in line with other Trust policies
July 2023	6	2 - Legal Framework added, including links to Trust Policies and new KCSIE 2023 statutory guidance
July 2023	8	4 - New section added on "Multi-Agency Working"
July 2023	10	6.3 - Roles and Responsibilities for 'all staff' updated
July 2023	11	6.4 - Roles and Responsibilities for teachers updated
July 2023	11	6.5 - Roles and Responsibilities for the DSL updated
July 2023	12	6.7 - Roles and Responsibilities for the Trust Board added
July 2023	12	6.7 - Roles and Responsibilities for the LGC updated
July 2023	14	6.8 - Roles and Responsibilities for the Headteacher/Principal added
July 2023	14	7.1 - Point amended to clarify the specific applicable policy
July 2023	17	8.3.2-8.3.4 - Referral stages clarified for a child suffering or likely to suffer from harm or immediate danger
July 2023	18	8.5.10-8.5.11 - Referral stages clarified for suspected or confirmed FGM
July 2023	19	8.6.4 - Clarification about where to record concerns about a child
July 2023	19	8.6.5 - **Figure 1** - concerns about child welfare added
July 2023	20	8.7 - Early Help - defined
July 2023	21	8.7.5 - Line added to direct the reader to **Appendix 5** for details of how to refer a child for early help
July 2023	21	8.8 - Line added to direct the reader to **Appendix 5** for details of how to refer to CSCS
July 2023	21	8.9.2 - Line added to direct the reader to **Appendix 5** for details of who to contact in absence of the DSL

July 2023	21	8.10.5 - Line added to direct the reader to **Appendix 5** for details of the local mental health crisis team
July 2023	22	8.11.1 - Detail added to direct staff to the appropriate persons to report concerns of harm/abuse to
July 2023	22	8.11.4 - Detail added to direct staff to the location of appropriate Trust policies
July 2023	23	8.11.8 - Line added to direct the reader to **Appendix 5** for details of the LADO
July 2023	23	8.11.8 - Point updated regarding who to contact for advice regarding low level concerns
July 2023	25	10 - Title changed from "Sharing of nudes and semi-nudes" to "Consensual and non-consensual sharing of indecent images/videos"
July 2023	27	10.1-10.3 - Points added for clarity
July 2023	28	11.1 - Safeguarding within the curriculum defined
July 2023	29	12.4 - Line added to direct the reader to **Appendix 5** for details of how pupils can report concerns
July 2023	29	13.3.2 - Online safety considerations expanded
July 2023	30	13.3.3 - Reference to the Trust's E-Safety policy added
July 2023	30	14.5 - Point added re: additional safeguarding challenges
July 2023	31	16.2 - Line added to direct the reader to **Appendix 5** for details of pastoral support available
July 2023	32	18.4 - Line added to direct the reader to **Appendix 5** for details of support for LAC and PLAC
July 2023	32	19.4 - Line added to direct the reader to **Appendix 5** for details of additional support for LGBTQ+ pupils
July 2023	32	20 - Section added regarding use of school/academy premises
July 2023	33	21 - Section added for work experience
July 2023	35	24.1.3 - Details added regarding induction training for all staff
July 2023	35	24.1.6 - Point added regarding staff input about safeguarding
July 2023	36	24.2 - Title amended to reflect the potential of multiple deputy DSLs
July 2023	36	24.2.4 - Line added to direct the reader to **Appendix 5** for details of DSL supervision
July 2023	36	25 - Section for Monitoring and Review added
July 2023	38	**Appendix 1** - Further details added regarding types of abuse
July 2023	45	**Appendix 3** - Further detail added regarding allegations against staff
July 2023	53	**Appendix 4** - Detail added to specific safeguarding concerns
July 2023	65	**Appendix 5** - Localised Procedures added

This policy has been approved by:			
Signed	*Chief Executive Officer*	**Date**	
Signed	*Chair of the Trust Board*	**Date**	

Statement of Intent

Hope Sentamu Learning Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school/academy premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for safeguarding and promoting the welfare of children and young people, in line with safeguarding legislation and statutory guidance. it will be achieved by:

- Ensuring that members of the LGC, the Headteacher/Principal and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the Designated Safeguarding Lead (DSL).
- Teaching pupils how to be safe and recognise behaviour that is unacceptable or poses a safeguarding risk.
- Identifying and making provisions for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the Headteacher/Principal and any new staff and volunteers are only appointed when all the appropriate safeguarding checks have been satisfactorily completed, verified and recorded on the school/academy's Single Central Record (SCR).

Full details of the safer recruitment policy and procedures can be found in the Trust's Recruitment and Selection Policy and should be read in conjunction with this policy.

1. Policy Objectives

1.1. The policy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legal Framework

2.1. This policy has due regard to **legislation** and **statutory guidance**, including, but not limited to, the following:

- DfE Keeping Children Safe in Education (2023)
- DfE Working Together to Safeguard Children (2018)
- DfE Governance Handbook (2020)
- DfE 'The Prevent duty' (2015)
- DfE 'Disqualification under the Childcare Act 2006' (2018)
- Education (Independent School Standards) Regulations (2014)
- The Children Act (1989 with 2004 amendments)
- Serious Crime Act (2015) (Section 74)
- Female Genital Mutilation Act 2003 Section 5B(11)
- Multi-Agency Statutory guidance on FGM (2020)
- The Rehabilitation of Offenders Act (1974)
- Safeguarding Vulnerable Groups Act (2006) (Schedule 4)
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Home Office Prevent Duty Statutory Guidance (2021)
- HM Government 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism' (2021)
- Counter Terrorism and Security Act (2015)
- The Human Rights Act (1998)
- The Equality Act (2010)
- Equality and Human Rights Commission: Public Sector Equality Duty (PSED)
- **[Primary schools/academies only]** The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- **[Primary schools/academies only]** Childcare Act 2006
- **[EYFS only]** DfE Early years foundation stage (EYFS) statutory framework (2021)

2.2. This policy also complies with the Hope Sentamu Learning Trust Funding Agreement and Articles of Association.

2.3. The policy is implemented in conjunction with the following **Trust** policies and procedures:

- Behaviour Policy
- Anti-bullying Policy
- Code of conduct Policy
- Complaints Policy and Procedure

- Whistleblowing Policy
- Managing Allegations of Abuse Against Staff Policy
- Health and Safety Policy & Procedures Manual
- Attendance and Absence Policy
- E-Safety and Acceptable Usage Policy
- Mobile Phone and Bring Your Own Device (BYOD) Policy
- Relationships and Sex Education (RSE) and Health Education Policy
- First Aid Policy
- Looked-After Children (LAC) and Previously Looked-After Children (PLAC) Policy
- Supporting Pupils with Medical Conditions and Administering Medication Policy
- Recruitment and Selection Policy
- UK GDPR Privacy Notices
- Equality Policy and Objectives
- Student Mental Health and Wellbeing Policy
- Special Educational Needs and Disability (SEND) Policy

3.   Definitions

3.1.   Safeguarding and promoting the welfare of children means:
- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

3.2.   Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

3.3.   Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. **Appendix 1** explains the different types of abuse.

3.4.   Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. **Appendix 1** defines neglect in more detail.

3.5.   Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

3.6.   Children includes everyone under the age of 18.

3.7.   The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

3.8.   Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

3.9.   Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4.   Multi-Agency Working

4.1.   The school/academy contributes to multi-agency working as part of its statutory duty. The school/academy is aware of the local safeguarding resources available and applicable referral processes.

4.2.   The school/academy will work alongside the Police, health services, children's social care services and other agencies to protect the welfare of its pupils. Early help provision and multi-agency support plans will help to provide additional support to pupils with particular needs.

4.3.   The school/academy recognises the importance of inter-agency working in identifying and preventing Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).

4.4.   The school/academy recognises the importance of information sharing between professionals and the school/academy in order to effectively meet the needs of our pupils and to identify any requirement for 'early help'. Staff will have an awareness of the UK GDPR and Data Protection Act (2018) and will understand that these regulations do not act as a barrier to information sharing where failure to do so would result in a pupil being at risk of harm. Staff will seek advice from the Trust's Data Protection Officer (DPO) via email (dpo@hslt.academy) if they are uncertain of whether it is appropriate to share information.

5.   Equality Statement

5.1.   Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing abuse. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

5.2.   We give special consideration to children who:
   ● Have special educational needs (SEN) or disabilities or health conditions (see section 10)
   ● Are young carers
   ● May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
   ● Have English as an additional language
   ● Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
   ● Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
   ● Are asylum seekers

- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from the school/academy to be home educated

5.3. Equality and Human Rights Commission (equalityhumanrights.com) - Equality Act 2010.

5.3.1. In accordance with the Equality Act, the school/academy will not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender. reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

5.3.2. The school/academy will take positive action, where proportionate, to deal with the disadvantages these pupils face.

5.4. The Public Sector Equality Duty (PSED) is found in the Equality Act.

5.4.1. All schools/academies will have due regard to:

- The need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act);
- Advance equality of opportunity;
- Foster good relations between those who share a relevant protected characteristic and those who do not.

5.4.2. The Human Rights Act 1998 (HRA) sets out expectations to respect and protect an individual's human rights when they make individual decisions about them. Schools/academies will act in a way that is compatible with the Convention. The specific convention rights applying to schools/academies and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,
- Protocol 1, Article 2: protects the right to education.

5.4.3. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information can be found in KCSIE 2022

6. Roles and Responsibilities

6.1. Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school/academy and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to contractors, extended school/academy and off-site activities.

6.2. The school/academy plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

6.3.   All Staff

6.3.1.   All staff who work directly or indirectly with children should read and fully understand the following Trust policies:
- Safeguarding and Child Protection Policy
- Behaviour Policy
- Staff Code of Conduct Policy (this includes content regarding staff behaviour)
- Whistleblowing Policy
- Managing Allegations of Abuse Against Staff Policy
- Suspension and Exclusion Policy
- Anti-Bullying Policy

6.3.2.   Staff who work directly or indirectly with children are expected to:
- Read and understand Part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Read the DfE's statutory guidance 'Children Missing Education' (2016) and understand the Trust's safeguarding response to children who go missing from education
- Understand the role of the Designated Safeguarding Lead (DSL) and how they can be contacted
- Read and understand the Teachers' Standards
- Undertake safeguarding training, including online safety training during their induction. This training will be regularly updated on an annual basis
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- Consider at all times, what is in the best interests of the child
- Maintain an attitude of 'it could happen here' where safeguarding is concerned
- Undertake regular training as directed by the **Designated Safeguarding Lead (DSL)**
- Read and understand the staff behaviour policy (sometimes called a code of conduct) and the related policies including whistleblowing

6.3.3.   All staff who work directly or indirectly with children will be aware of:
- Our systems which support safeguarding, including this child protection and safeguarding policy, the behaviour policy, the role and identity of the designated safeguarding lead (DSL) and deputy DSL(s) and the safeguarding response to children who go missing from education.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as domestic abuse, child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school/academy and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.
- What to look for to identify children who need help or protection.
- The fact that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
- The fact that children with SEND, or certain medical or physical health conditions, can face additional barriers to reporting or recognising abuse or neglect
- The fact that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation

6.4.   **Teachers**, including the **Headteacher/Principal**, have a responsibility to:
- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Report any cases, where it appears, that an act of FGM has been carried out to the DSL, who will report this to the police; also referred to as 'known' cases.

6.4.1.   Section 16 (Pupils with a Social Worker) and **Appendix 4** of this policy outline in more detail how staff are supported to do this.

6.5.   The Designated Safeguarding Lead (DSL)
6.5.1.   The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school/academy. Please refer to **Appendix 5** for details of our DSL, how they can be contacted and safeguarding procedures in place in their absence.

6.5.2.   The DSL will be given the time, funding, training, resources and support to:
- Provide advice and support to other staff on child welfare and child protection matters

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children, including completing Early Help assessments
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of sexual violence, sexual harassment and harmful sexual behaviour and the associated risks

6.5.3.   The DSL will also:

- Keep the Principal/Headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Promote the educational outcomes of children with a social worker and other children deemed vulnerable
- Take lead responsibility for safeguarding and child protection, including the monitoring and local management of online safety and understanding the Trust wide filtering and monitoring systems and processes in place
- Ensure staff are supported during the referrals processes and provide support to staff to consider how safeguarding, welfare and educational outcomes are linked
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping

6.5.4.   The full responsibilities of the DSL and deputy DSL role(s) can be found in the statutory guidance: Keeping Children Safe In Education, and are set out in their job description.

6.6.   The Trust Board

6.6.1.   The Trust Board will ensure:

- That there are easily accessible systems in place for children to confidently report abuse, knowing that their concerns will be treated seriously, they will be understood and can safely express their views.

6.7.   The Local Governing Committee (LGC)

6.7.1.   The LGC will:

- Monitor the whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Hold the Principal/Headteacher to account for the effective implementation and management of this policy and subsequent versions following Trust Board review.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school/academy's local multi-agency safeguarding arrangements.

- Appoint a **safeguarding link governor** to monitor the effectiveness of this policy in conjunction with the full governing board during network meetings with other safeguarding link governors within the Trust.

6.7.2. The LGC will ensure:
- That they take operational oversight responsibility for the school/academy's safeguarding arrangements.
- That the school/academy complies with its duties under the child protection and safeguarding legislation listed within the Legal Framework section of this policy.
- That the safeguarding training, policies and procedures provided by the Trust are being effectively implemented, monitored and managed within the school/academy.
- That they comply with their obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions to protect our pupils.
- That all staff working in the school/academy read Part One of the latest Keeping Children Safe in Education legislation and that the school/academy has delivered the Trust safeguarding training at the start of each academic year or on appointment.
- Ensure that the DSL has the appropriate status and authority to carry out their role, including additional time, funding, training, resources and support Ensuring that the roles and responsibilities of the DSL and DDSL as referenced in Annex C of KCSiE (2023) are reflected in their job description.
- Safeguarding and child protection are at the forefront and underpin all relevant aspects of the school/academy daily operations.
- The leadership team and relevant staff are aware of and understand the Trust wide IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- There are appropriate policies and procedures that are implemented effectively in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This and other related policies reflect that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- The school/academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors) and that these are effectively reported to the central services team in line with the associated policies. **Appendix 3** of this policy covers this procedure.
- Child protection files are maintained in accordance with KCSIE guidance.
- That the school/academy follow the Trust wide Safer Recruitment Policy and Procedures are in place and are effectively managed by the school/academy leadership team.
- The school/academy holds more than one emergency contact for each pupil.

6.7.3. Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school/academy about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school/academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply

6.7.4.   The **Chief Operating Officer (COO)** or **Designated Senior Leader** will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher/principal, where appropriate (see **Appendix 3**).

6.7.5.   All governors will read Keeping Children Safe in Education in its entirety and complete safeguarding training as directed by the Trust's Central Services Team (CST).

6.7.6.   Section 15 of this policy has information on how governors are supported to fulfil their role.

6.8.   The Principal/Headteacher
6.8.1.   The Principal/Headteacher is responsible for the implementation of this policy, including:
   ● Ensuring that staff (including temporary staff) and volunteers:
      ○ Are recruited in line with the Trust's Safer Recruitment Policy and Procedures
      ○ Are informed of our systems which support safeguarding, including this policy, as part of their induction and training
      ○ Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
   ● Communicating this policy to parents/carers when their child joins the school/academy and via the school/academy website.
   ● Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
   ● Ensuring that all staff undertake appropriate safeguarding and child protection training, either on an annual basis or on appointment.
   ● Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see **Appendix 3**).
   ● Making decisions regarding all low-level concerns in collaboration with the central team representative (See **Appendix 3**).

6.8.2.   **[EYFS Providers Only]:** Ensuring the relevant staffing ratios are met, where applicable

6.8.3.   **[EYFS Providers Only]:** Making sure each child in the Early Years Foundation Stage is assigned a key person

6.8.4.   The Headteacher/Principal will ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+ and that the environment has a positive inclusive approach.

6.8.5.   The Headteacher/Principal will ensure that the school/academy put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.

6.8.6.   The Headteacher/Principal will ensure that appropriate mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.

6.8.7.   The Headteacher/Principal will ensure that the school/academy appoints a senior leader to the role of DSL as an explicit part of the role-holder's job description.

6.8.8.   The Headteacher/Principal will ensure that the school/academy appoint one or more deputy DSLs to provide support to the DSL and ensure that they are trained to the same standard and that this role is explicit within their job description.

6.8.9.   The Headteacher/Principal will ensure that online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies and training is included as part of the induction.

6.8.10.   The Headteacher/Principal will ensure that all staff and governor training records are up-to-date at all times.

6.9.   Designated Teacher

6.9.1.   The School/academy will appoint a designated teacher who will work with the virtual school head to support the progress of looked after children and promote the educational achievement of previously looked after children.

6.9.2.   The Virtual school head is the lead responsible officer for ensuring that arrangements are in place to improve the educational experiences and outcomes of the authority's looked-after children, including those placed out-of-authority, including responsibilities towards children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England or Wales. They also have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. The virtual school head should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

7.   Confidentiality and Communication

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school/academy not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL should consider that:

- ■ Parents or carers should normally be informed (unless this would put the victim at greater risk)
- ■ The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the police and/or local authority children's social care as soon as possible
- ■ Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
  - ○ Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - ○ Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - ○ Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in **Appendix 3**.

7.1. All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the Trust's Data Protection (UK GDPR) Policy.

7.2. Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the academy will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence sexual harassment is progressing through the criminal justice system, the academy will do all it can to protect the anonymity of the pupils involved in the case.

7.3. Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

7.4. Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victims' consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

7.5. Depending on the nature of the concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussions with the victims' parents will relate to the arrangements being put in place to safeguard the victim, the aim of understanding their wishes in terms of support arrangements and the

progression of the report. Discussion with the alleged perpetrators' parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

7.6. Where confidentiality or anonymity has been breached, the academy will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches can be prevented.

8. Recognising Abuse and Taking Action

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

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

8.3. If a child is suffering or likely to suffer harm, or in immediate danger

8.3.1. Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.

8.3.2. Tell the DSL (see **Appendix 5** for contact information) as soon as possible if you make a referral directly.

8.3.3. The police can be contacted through:

Telephone Numbers for your local Police Force:	**101**	Non-emergency, where you believe a child is suffering (or has suffered) from harm
	999	In case of an emergency, where you believe a child is in immediate danger

8.3.4. Please refer to **Appendix 5** for further details on how you can contact Children's Social Care to make an urgent referral.

8.4. If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. This must also be recorded on CPOMS (Child Protection Online Management System). Do not assume that the DSL will read this on CPOMS, you must inform the

DSL directly. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

8.4.2.   Bear in mind that some children may:
- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
- None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

8.5.   If you discover that FGM has taken place or a pupil is at risk of FGM

8.5.1.   Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

8.5.2.   FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

8.5.3.   Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in **Appendix 4** of this policy.

8.5.4.   Any teacher who either:
- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

8.5.5.   Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

8.5.6.   Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

8.5.7.   Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

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

8.5.9.   Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

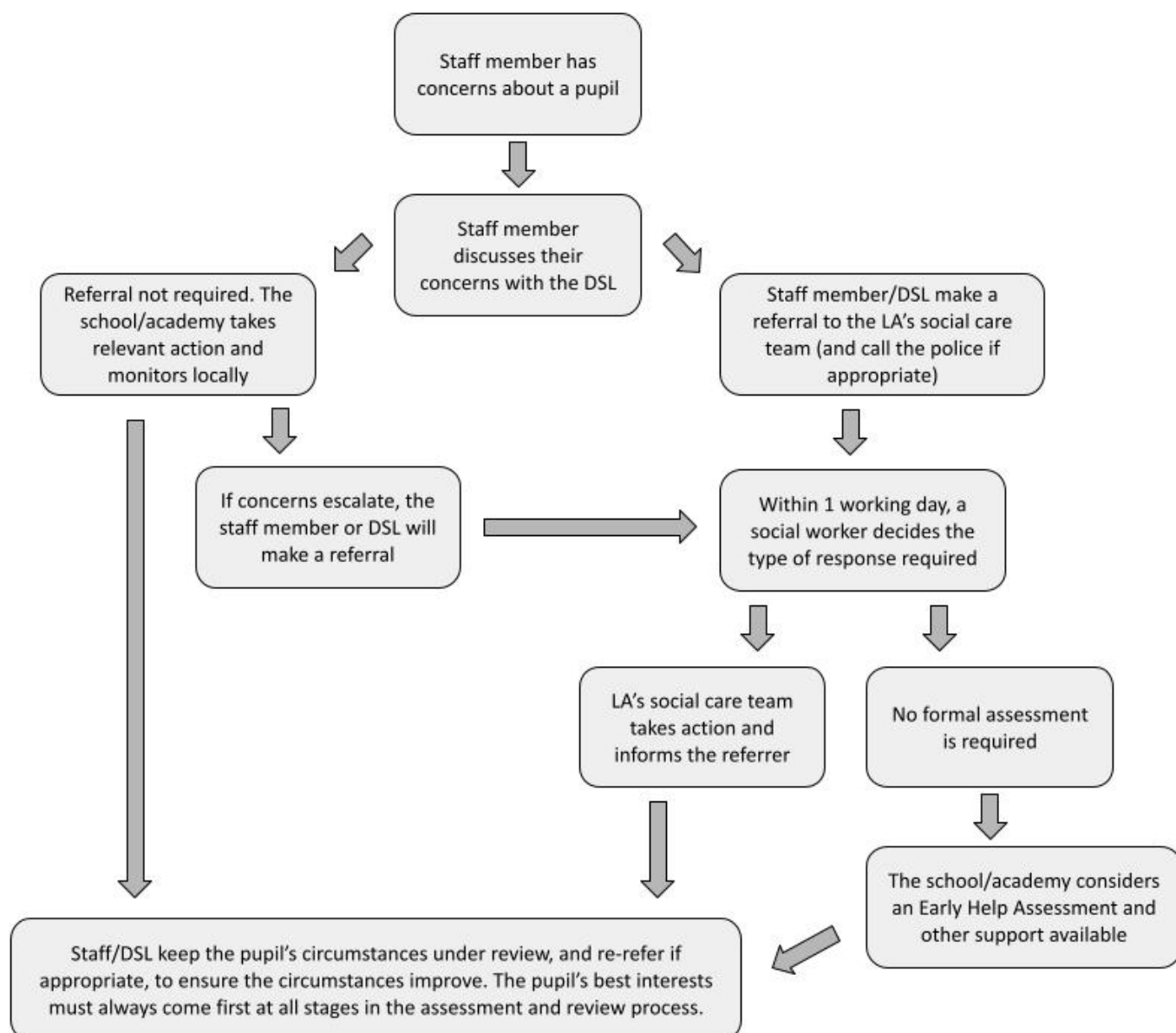8.5.10. Please refer to **Appendix 5** for details of local referral mechanisms.

8.5.11.   The police can be contacted through:

Telephone Numbers for your local Police Force:	101	Non-emergency, where you believe a child is suffering (or has suffered) from harm
	999	In case of an emergency, where you believe a child is in immediate danger

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

8.6.1.   Where possible, speak to the DSL first to agree a course of action.

8.6.2.   If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Refer to **Appendix 5** for details of who to contact when the DSL is not available.

8.6.3.   You are advised to seek advice from local authority children's social care (details of which can be found within **Appendix 5**). You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

8.6.4.   All concerns will be recorded on CPOMS and any subsequent actions, referrals or outcomes will also be recorded on CPOMS. Details of any actions taken will be shared with the DSL as soon as practically possible.

8.6.5.   **Figure 1** below illustrates the procedure to follow if you have any concerns about a child's welfare.

Figure 1

Staff member has concerns about a pupil

Staff member discusses their concerns with the DSL

Referral not required. The school/academy takes relevant action and monitors locally

Staff member/DSL make a referral to the LA's social care team (and call the police if appropriate)

If concerns escalate, the staff member or DSL will make a referral

Within 1 working day, a social worker decides the type of response required

LA's social care team takes action and informs the referrer

No formal assessment is required

The school/academy considers an Early Help Assessment and other support available

Staff/DSL keep the pupil's circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The pupil's best interests must always come first at all stages in the assessment and review process.

8.7. Early Help Assessment

8.7.1. Early help means providing support as soon as possible once a problem emerges, at any stage in a child's life. Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs
- Are young carers
- Show signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Are frequently missing or going missing from care or from home
- Are at risk of been radicalised or exploited
- Have family members in prison, or affected by parental offending

- Are in family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse
- Misuse drugs or alcohol.
- Have returned home to their family from care
- Are at risk of Honour Based Abuse, such as FGM or Forced Marriage
- Are privately fostered
- Are persistently absent from education, including persistent absences for party of the school day
- Show early signs of abuse and/or neglect in other ways.

8.7.2.   If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

8.7.3.   We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

8.7.4.   The DSL will keep the case under constant review and the school/academy will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

8.7.5.   To access support from the Early Help Service, an Early Help Assessment must be completed. Please refer to **Appendix 5** for contact details of your local Early Help Assessment team.

8.7.6.   All referrals to Early Help services including assessments will be recorded on CPOMS.

8.8.   Referral Process

8.8.1.   If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. Please refer to **Appendix 5** for details of how to contact your local authority Children's Social Care services.

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

8.8.3.   The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

8.8.4.   If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

8.9.   If you have concerns about extremism

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

8.9.2.   If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Refer to **Appendix 5** for details of who to contact when the DSL is not available. Make

a referral to local authority children's social care directly, if appropriate and inform the DSL as soon as practically possible after the referral.

8.9.3.   Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

8.9.4.   The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

8.9.5.   You can contact the confidential anti-terrorist hotline on 0800 789 321 if you:
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

8.10.   If you have a mental health concern
8.10.1.   Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

8.10.2.   Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

8.10.3.   If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

8.10.4.   If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.6.

8.10.5.   Please refer to **Appendix 5** for contact details of the local Mental Health Crisis Team and details of how the school/academy identify possible mental health concerns.

8.11.   Concerns about a staff member, supply teacher, volunteer or contractor
8.11.1.   If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher/Principal or Chief Operating Officer as soon as possible. If the Headteacher/Principal is the subject of the allegation/concern, or in absence of the Headteacher/Principal, you must direct your concerns to the Chief Operating Officer. If the COO is the subject of the concern/allegation, you must direct your concerns to the Chair of Governors.

8.11.2.   Any concerns regarding the safeguarding practices at the school/academy will be raised with the Senior Leadership Team (SLT), and the necessary whistleblowing procedures will be followed, as outlined in the Trust's Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

8.11.3.   Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the

Headteacher/Principal, staff are advised to report the concern directly to the local authority designated officer (LADO).

8.11.4. All allegations against staff, supply staff, volunteers and contractors will be managed in line with the Trust's Managing Allegations of Abuse Against Staff Policy - a copy of which will be made available to all staff via the HLST Policies and Procedures shared Google Drive. The academy/school will ensure all allegations against staff, including those who are not employees of the academy/school, are dealt with appropriately and that the academy/school liaises with the relevant parties.

8.11.5. When managing allegations against staff, the academy/school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Trust's Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:
- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

8.11.6. The Headteacher/Principal will source advice from the Chief Operating Officer or a designated senior member of the central services team. The information collected to categorise the type of behaviour and determine any further action, in line with the HSLT Code of Conduct Policy. The Chief Operating Officer or a designated senior member of the central team will be the primary decision-maker in respect of all low-level concerns.

8.11.7. If the concern is raised via a third party, the Headteacher/Principal will collect evidence where necessary by speaking:
- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses to determine any further action.

8.11.8. Please refer to **Appendix 5** for details of how to contact your Local Authority Designated Officer.

9.   Allegations of Abuse Made Against other Pupils

9.1. We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

9.2. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

9.3. Most cases of pupils causing harm to other pupils will be dealt with under the Trust wide Behaviour Policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
- Is serious, and potentially a criminal offence
- Could put pupils in the school/academy at risk
- Is violent

- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

9.4.   See **Appendix 4** for more information about child-on-child abuse.

9.5.   Procedures for dealing with allegations of child-on-child abuse

9.5.1.   If a pupil makes an allegation of abuse against another pupil:
- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

9.5.2.   If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

9.5.3.   All incidents or concerns regarding child on child abuse will be recorded on CPOMS.

9.6.   Creating a supportive environment in school and minimising the risk of child-on-child abuse

9.6.1.   We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

9.6.2.   To achieve this, we will:
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

- Create opportunities for pupils to raise concerns about behaviour or safety issues in school through the school/academy council and pupil surveys

9.6.3. Ensure staff are trained to understand:
- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in the school/academy, it does not mean it is not happening staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

9.6.4. The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

9.6.5. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school/academy from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

10. Consensual and non-consensual sharing of indecent images/videos (e.g 'sexting')*

This is based on [guidance from the UK Council for Internet Safety](#) for all staff and for [DSLs and senior leaders](#).

10.1. The school/academy will ensure that staff are aware of their requirement to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos of children (also known as "sexting" or youth-produced sexual images) as a serious safeguarding concern.

10.2. Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful.

10.3. Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted.

10.4.   Your responsibilities when responding to an incident

10.4.1. If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL **immediately**.

10.4.2. You must **not**:
- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

10.4.3. You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

10.5.   Initial Review Meeting

10.5.1. Following a report of an incident, the DSL will hold an initial review meeting with appropriate school/academy staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school/academy, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

10.5.2. The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)

- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

10.5.3.   If none of the above apply then the DSL, in consultation with the headteacher/principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

10.6.   Further Review by the DSL
10.6.1.   If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

10.6.2.   They will hold interviews with the pupils involved (if appropriate).

10.6.3.   If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

10.7.   Informing Parents/Carers
The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

10.8.   Referring to the Police
If it is necessary to refer an incident to the police, this will be done through phoning 101 or 999.

10.9.   Recording Incidents
All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

11.   Teaching Safeguarding to Pupils - Curriculum Coverage

11.1.   Pupils are taught about how to keep themselves safe including online and the issues surrounding the sharing of nudes and semi-nudes as part of our curriculum (e.g. PSHE lessons/Personal Development Curriculum and computing programmes). The programme is fully inclusive and developed to be age and stage of development appropriate, especially when considering the needs of children with SEND and other vulnerabilities.

11.2.   To support pupils to understand the risks relevant topics will be included within Relationships Education (for all primary pupils), and Relationships and Sex Education (for all secondary pupils) and Health Education (for all primary and secondary pupils). In teaching these subjects the school/academy will have regard to the statutory guidance.

11.3.   Teaching in relation to the sharing of nudes and semi-nudes covers the following:
- What it is
- How it is most likely to be encountered

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

11.4.   Pupils also learn the strategies and skills needed to manage:

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

11.5.   This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school/academy will follow in the event of an incident.

12.   Reporting Systems for our Pupils

12.1.   Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

12.2.   We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

12.3.   To achieve this, we will:

- Put systems in place for pupils to confidently report concerns about abuse including anonymous reporting
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

12.4.   Please refer to **Appendix 5** for details of how pupils can report concerns.

13.   Online Safety and the Use of Mobile Technology

13.1.   We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

13.2.   To address this, our school/academy aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Establish clear guidelines for remote learning which are shared and communicated to parents

13.3.   The 4 key categories of risk

13.3.1.   Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

13.3.2. To meet our aims and address the risks above we will:
- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make parents aware of the expectations of remote learning, be clear what children are being asked to do online including the sites they will need to access and how the school/academy will interact with them online.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to the school/academy for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
  - Staff have clear guidelines on acceptable communication with pupils online
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet on the school/academy premises, use of the school/academy's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place appropriate and robust filtering and monitoring systems on school/academy devices and networks, to prevent children accessing inappropriate material online and to limit pupils' exposure to the 4 key categories of risk (described above).
- Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

13.3.3. This section summarises our approach to online safety and mobile phone use. For further information regarding our approach to online safety, please refer to the Trust's E-Safety and Acceptable Usage Policy.

14. Notifying Parents or Carers

14.1. Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

14.2. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

14.3. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

14.4. The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):
- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

14.5. The school/academy recognises that some groups of pupils may face additional safeguarding challenges and additional barriers may exist when determining abuse and neglect in these groups of pupils. The school/academy will take into account additional considerations for managing safeguarding concerns and incidents amongst these groups, and may liaise with parents/carers more regularly to help manage this.

15. Children Absent from Education

15.1. A child missing education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation, child criminal exploitation, issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

15.2. Staff will follow the attendance procedures for all non-attendance. Unauthorised absence, will be followed up to establish any patterns and to identify any risks associated with the absence, this will help prevent further absence or going missing. This includes informing the local authority if a child leaves the school/academy without a new school/academy being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

15.3. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to missing education, such as travelling to conflict zones, FGM and forced marriage.

15.4. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if through our enquiries, we have reasons to believe the child is suffering or likely to suffer from harm, or in immediate danger.

15.5. Insert further procedures for managing non-attendance can be found in the Trust's Attendance Policy.

16. Pupils with Special Educational Needs, Disabilities or Health Issues

16.1. We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

16.2. We offer extra pastoral support for these pupils. Please refer to **Appendix 5** for further information regarding pastoral support offered.

16.3. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

17. Pupils with a Social Worker

17.1. Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

17.2. The DSL and all members of staff will work with and support social workers and the virtual school head to help protect vulnerable children.

17.3. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support
- Responding to incidents of behaviour or misconduct

18. Looked-After and Previously Looked-After Children

18.1. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

18.2. We have appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children (LAC) and previously looked-after children (PLAC) in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

18.3. As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

18.4. Please refer to **Appendix 5** for further information regarding the designated teacher working to promote educational achievement of LAC and PLAC on behalf of the school/academy.

19. Pupils who identify as LGBTQ+

19.1. The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who identify as LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

19.2. To reduce the additional barriers faced to children who may be LGBTQ+ the school/academy will provide a safe space for a child to speak out or share their concerns with members of staff.

19.3. LGBTQ+ inclusion is part of the statutory Relationship and Sex Education and Health Education curriculum.

19.4. Please refer to **Appendix 5** for further details regarding additional support arrangements in place at the school/academy for children who identify as LGBTQ+.

20. Use of the School/Academy Premises for Non-School Activities

20.1. Where the school/academy hires or rents out their facilities or premises to organisations or individuals (e.g. for providers to run community or extracurricular activities, referred to as Letting Clients), it will ensure that letting contract is in place along with copies of the following essential information:-

- Insurance Certificate (in date)
- Safeguarding contact and policy document
- Health & Safety policy
- First Aider details (must be on site during hire period)

20.2. The school/academy will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

20.3. Where the LGC provides activities under the direct supervision or management of school/academy staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the LGC will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed.

20.4. The LGC will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

20.5. External bodies that host extracurricular activities and clubs at the school/academy, (e.g. charities or companies), will work in collaboration with the school/academy to effectively safeguard pupils and adhere to local safeguarding arrangements.

20.6. Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to children's social care services or the police, if necessary.

20.7. All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport in order to host any activities on the school/academy premises.

21. Work Experience

21.1. When a pupil is due to attend a work experience placement, the school/academy will ensure that the work experience provider has appropriate safeguarding policies and procedures in place.

21.2. In such instances where a pupil conducts work experience at the school/academy, an enhanced DBS check will be obtained if the pupil is over the age of 16.

21.3. The school/academy will ensure that any pupils attending work experience off-site are aware of the local reporting procedures for any safeguarding concerns. The school/academy will ensure that pupils attending work experience off-site are provided with the contact details for the DSL and any other person(s) responsible for their welfare whilst they are away from the school/academy premises during normal school hours.

22. Complaints and Concerns about School Safeguarding Policies

22.1. Complaints against staff
Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

22.2. Whistle-blowing

The Trust has a separate whistle-blowing policy that covers concerns regarding the way the school/academy safeguards pupils – including poor or unsafe practice, or potential failures. The Whistle-blowing policy can be found on the school/academy website.

23.   Record Keeping

23.1.   All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

23.2.   Records will include:
- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

23.3.   Concerns and referrals will be kept in a separate child protection file for each child.

23.4.   Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

23.5.   Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school/academy.

23.6.   Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

23.7.   If a child for whom the school/academy has, or has had, safeguarding concerns moves to another school/academy, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

23.8.   To allow the new school/academy/college to have support in place when the child arrives, this should be within:
- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

23.9.   In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school/academy and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

23.10. Most records are kept securely on the CPOMS system, with historic paper-based records from primary schools/academies kept in the locked safeguarding filing cabinet in the DSL office. All new records are kept electronically on the secure CPOMS system. All records are confidential, staff access to safeguarding records on CPOMS are limited to the DSL and DDSL teams. Safeguarding records are retained in accordance with the retaining schedule.

23.11. When asked for information by other agencies, this is shared when appropriate, to safeguard students and ensure their safety.

23.12. If a child is to be removed from the administration register the school/academy will inform the local Authority of all delegations.

23.13. In addition:
- **Appendix 2** sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- **Appendix 3** sets out our policy on record-keeping with respect to allegations of abuse made against staff

24. Training

24.1. All staff

24.1.1. All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school/academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

24.1.2. This training will be regularly updated and will:
- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

24.1.3. Safeguarding training on induction will cover:
- The Trust's Safeguarding and Child Protection Policy
- The Trust's Child-on-Child Abuse Policy
- The Trust's Code of Conduct Policy
- Part 1 of Keeping Children Safe in Education (2023)
- The Trust's Behaviour Policy
- Appropriate child protection and safeguarding training (including CSE, CCE, contextual safeguarding and how to keep LAC and PLAC safe)
- Online safety training, including applicable roles and responsibilities in relation to filtering and monitoring
- Information about the role and identity of the DSL and deputy DSLs

24.1.4. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

24.1.5. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

24.1.6. Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school/academy.

24.1.7. Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

24.1.8. All volunteers will receive appropriate training, the DSL will determine the level and frequency of the training required.

24.2.   The DSL and deputy DSL(s)

24.2.1. The DSL and deputy DSL(s) will undertake child protection and safeguarding training at least every 2 years.

24.2.2. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

24.2.3. They will also undertake Prevent awareness training.

24.2.4. Please refer to **Appendix 5** for further information regarding supervision for the DSL.

24.3.   Governors

24.3.1. All governors will receive safeguarding and child protection training (including online safety) at induction, which is regularly updated. This is to make sure that they:
- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school/academy to deliver a robust whole-school approach to safeguarding

24.3.2. As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

24.4.   Recruitment – interview panels

24.4.1. At least 1 person conducting any interview for any post at the school/academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

24.4.2. See **Appendix 2** of this policy for more information about our safer recruitment procedures.

24.5.   Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

25.   Monitoring and Review

25.1. The following appendices detail more comprehensive information regarding specific safeguarding issues, types of abuse, the Trust's safer recruitment process as well as localised procedures applicable to the school/academy.

25.2. This policy will be reviewed annually by the Trust and in line with up-to-date safeguarding issues and legislation as they emerge and evolve. The next scheduled review date for this policy can be found on the cover page of the document.

25.3.   Any changes to this policy will be communicated to all staff within the Trust and staff are expected to familiarise themselves with all processes and procedures outlined in this policy as part of their induction.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

All staff will be aware of the indicators of abuse and neglect and understand that pupils can be at risk of harm online, within the school/academy setting, at home and/or outside of these environments. Staff will be vigilant to the indicators of abuse and are encouraged to raise concerns with the DSL, no matter how minor they may seem.

All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:
- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:
- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to:
- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

Recruitment and Selection Process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

● Our school/academy's commitment to safeguarding and promoting the welfare of children
● That safeguarding checks will be undertaken
● The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
● Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application Forms

Our application forms will:

● Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
● Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

● Consider any inconsistencies and look for gaps in employment and reasons given for them
● Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

● Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  ○ If they have a criminal history
  ○ Whether they are included on the barred list
  ○ Whether they are prohibited from teaching
  ○ Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  ○ Any relevant overseas information
● Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking References and Checking Employment History

We will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:
- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school/academy based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and Selection

When interviewing candidates, we will:
- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment Vetting Checks

We will record all information on the checks carried out in the school/academy's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:
- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, Governors,Headteacher/Principals and Deputy/Assistant Headteachers.

[Primary Schools/Academies Only] We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:
- Responsible, on a regular basis in a school/academy or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school/academy or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing Staff
In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:
- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

Contractors
We will ensure that any contractor, or any employee of the contractor, who is to work at the school/academy has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:
- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

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

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

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

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

[Primary Schools/Academies Only] For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

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

[Primary Schools/Academies Only] In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

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

[Primary Schools/Acadmies Only]
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors and Members
All governors, Trustees, Local Governors and Members will have an enhanced DBS check without barred list information.
They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school/academy governor).

The chair of the Local Governing Committee will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:
- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff Working in Alternative Provision Settings
Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who Supervise Pupils on Work Experience
When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

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

Pupils Staying with Host Families
Where the school/academy makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school/academy is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3 - Allegations of Abuse Made Against Staff

Section 1: Concerns or allegations that may meet the harm threshold

This section is based on 'Section 1: Concerns or allegations that may meet the harm threshold' in Part 4 of Keeping Children Safe in Education. Section 1 of the guidance is about managing cases of concerns or allegations that might indicate a person would pose a risk of harm to children if they are involved in any capacity with work in a school/academy setting.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:
- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school/academy

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. It is important that the school/academy has clear reporting procedures in place regarding allegations and all reports will be investigated in full by the Trust, no matter how minor these may seem.

A 'case manager' will lead any investigation. This will be the Chief Operating Officer (COO) or a Designated Senior Leader (such as the Headteacher/Principal). The Chair of Governors may take on this role if a Senior Leader is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement. The Trust will ensure that allegations are managed fairly, quickly and consistently.

The Initial Response to an Allegation
Where the school/academy identifies a child has been harmed, or a child is deemed to be at risk of immediate harm, they will contact the Police and local authority children's social care services immediately.

The school/academy recognise that there are **two** aspects to consider when an allegation is made:
1. **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care services
2. **The investigation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action. The case manager will ensure that appropriate support is provided for the person subject to the allegation

Suspension of the Accused Until The Case Is Resolved
Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school/academy so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school/academy so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school/academy within the Trust.

If in doubt, the case manager will seek views from the school/academy's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for Outcomes of Allegation Investigations

Outcome	Description
Substantiated	There is sufficient evidence to prove the allegation
Malicious	There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
False	There is sufficient evidence to disprove the allegation
Unsubstantiated	There is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
Unfounded	To reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for Dealing with Allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school/academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school/academy and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in the school/academy and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

[EYFS Only] We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school/academy is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school/academy will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school/academy's disciplinary process, should this be required at a later point.

Additional Considerations for Supply Teachers and all Contracted Staff
If there are concerns or an allegation is made against someone not directly employed by the school/academy, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.
- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

- The Local Governing Committee will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school/academy, while the school/academy carries out the investigation
- We will involve the agency fully, but the school/academy will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:
- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific Actions

Action Following a Criminal Investigation or Prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a Case where the Allegation is Substantiated

If the allegation is substantiated and the individual is dismissed or the school/academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school/academy will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school/academy will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals Returning to Work after Suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school/academy.

Unsubstantiated, Unfounded, False or Malicious Reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school/academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, Unfounded, False or Malicious Allegations

If an allegation is:
- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school/academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and Information Sharing

The school/academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:
- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school/academy will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school/academy's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):
- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-Recent Allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school/academy that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: Concerns That Do Not Meet the Harm Threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:
- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school/academy
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of Low-Level Concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school/academy may have acted in a way that:
- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children
- Having favourites

- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing Low-Level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school/academy's safeguarding system

Responding to Low-Level Concerns

If the concern is raised via a third party, the Headteacher/Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Headteacher/Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's Code of Conduct Policy. The Headteacher/Principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)]

Record Keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school/academy

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

This appendix provides further information regarding specific safeguarding issues that pupils may experience, and provides guidance on specific actions that should be taken in response to some of these concerns.

Children Absent from Education

A child who is absent from education, particularly repeatedly, can be a vital warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

The school/academy will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school/academy, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures to help prevent the risks of going missing in future.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school/academy
- Come from new migrant families

The school/academy will inform the local authority if a child leaves the school/academy without a new school/academy being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

All staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to a child being absent from education.

If a staff member suspects that a child is suffering from harm or neglect, they will follow local child protection procedures, including with respect to making reasonable enquiries. Staff will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into participating in criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

This form of abuse can be perpetrated by anyone and we recognise that perpetrators have often been victims themselves. CCE can be a one-off occurrence or a series of incidents over time, and ranges from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. CSE is often carried out in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:
- Having an relationship with an older young person or adult
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-Child Abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of the school/academy. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school/academy has a zero-tolerance approach to all forms of abuse, including child-on-child abuse. The school/academy recognises that even if there are no reports of child-on-child, that does not confirm that this type of abuse isn't happening within our school/academy.

All staff will be aware of the indicators of child-on-child abuse and how to identify it. All staff will liaise with the DSL if they have any concerns about child-on-child abuse.

Child-on-child abuse is most likely to include, but may not be limited to:
- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in the Trust's Safeguarding and Child Protection Policy and Child-on-Child Abuse Policy.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Pupils will be made aware of how to raise concerns about child-on-child abuse (by speaking with the DSL or a trusted member of staff) and will be reassured that any reports will be taken seriously and handled confidentially.

Domestic Abuse

Domestic abuse is defined as abusive behaviour towards another person with whom they share a personal connection (aka family or personal relationship). Domestic abuse encompasses a wide range of behaviours displayed in a single incident or a repeated pattern of incidents. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional abuse or manipulation. Children are often victims of domestic abuse.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse can also be classed as victims.

Older children (aged 16 or over) may become perpetrators of domestic abuse and/or violence in their own personal relationships and are more at risk of becoming perpetrators if they have been victims in the past. This can include sexual violence and sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn. Staff will be alert to signs of domestic abuse, such as withdrawal from social activities or a decline in behaviour or academic performance and will notify the DSL immediately of any concerns and follow appropriate reporting procedures as outlined in this policy.

Operation Encompass

When the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) before the child or children arrive at the school/academy the following day. This ensures that the school/academy has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

The DSL will provide support according to the child's needs and update school/academy records about their circumstances. Staff should be directed to Operation Encompass' reporting mechanism here: https://www.operationencompass.org/

Homelessness

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

The DSL (and deputy DSL(s)) will be aware of the contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

'Honour-Based' abuse (including FGM and Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:
- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from the school/academy, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:
- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

- - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from the school/academy
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage against their will. Threats/force can be physical or emotional and psychological.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will receive training around forced marriages and indicators that they should look out for which could be used to identify pupils at risk of forced marriage. Some potential indicators include:
- Increased absences from education
- Requesting for extended leave of absence
- Being fearful about forthcoming school holidays
- Being subjected to surveillance by siblings or cousins at the school/academy
- Demonstrating a decline in behaviour or academic performance
- Being withdrawn from the school/academy by their parents
- Showing signs of mental health concerns such as depression/anxiety

All staff will be made aware of the '1 chance' rule, i.e. the school/academy may only have 1 chance to speak to the potential victim and only 1 chance to safeguard them from forced marriage. Where applicable, the school/academy's PSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help and support from the school/academy and appropriate external agencies.

If a member of staff suspects that a pupil is being forced into marriage, they will immediately report this to the DSL who will then speak to the pupil about these concerns in a secure and private place. Under no circumstances will the staff member approach the pupil's family to discuss their concerns directly as this could potentially place the pupil in further, more immediate danger.

The DSL will:
- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing Radicalisation

- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- Terrorism is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. We have a duty to prevent children from being drawn into terrorism. Protecting pupils from the risk of radicalisation is part of the school/academy's wider safeguarding duties. The school/academy will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism.

The DSL and deputy DSL(s) will undertake Prevent awareness training and make sure that all staff have access to appropriate training to equip them to identify children at risk. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral.

The school/academy will assess the risk of pupils being drawn into terrorism. This assessment will be based on an understanding of the potential risk in the local area, in collaboration with local safeguarding partners and police force. The school/academy will ensure that suitable internet filtering is in place, and equip pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC advise that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions

- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will take appropriate action by discussing their concerns with the DSL.

Sexual Violence and Sexual Harassment Between Children in Education

Sexual violence and sexual harassment can occur:
- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.
Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school/academy.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:
- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school/academy that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBTQ+) children are at greater risk.

Staff should be aware of the importance of:
- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school/academy's approach to this type of abuse.

Serious Violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from education
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from the school/academy
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the Identity and Suitability of Visitors

It is vital that there is a clear protocol in place for the admittance of external visitors to the school/academy. There is an expectation that all staff, Trustees, Governors, visitors and parents/carers conform to the child protection guidelines below in order to prevent unauthorised persons from working with, or having access to pupils at the school/academy.

The school/academy has an overarching responsibility for the safety and wellbeing of all pupils attending the site. This applies during official opening hours (timetabled school hours), planned before/after school activities and on school trips/educational visits or other supervised off-site activities.

Visitor Safeguarding Procedures apply to:

- All teaching and non-teaching staff employed by the school/academy
- All external visitors entering the school/academy, both during normal school hours and for any planned after school activities
- Trustees and Governors
- All staff employed by the Trust
- Parents/carers
- Volunteers
- Pupils enrolled at the school/academy
- Local Authority staff
- Contractors

Any staff member arranging for a visitor to attend the school/academy must advise the Support Services Manager/Principal of the nature of the visit, the date and time of the visit and the name of the person(s) responsible for monitoring the visitor whilst they are on site.

The staff member arranging the visit must advise the visitor prior to attending that they will be required to adhere to the following conditions:
- All visitors must enter the school/academy through the main entrance and report to reception
- All visitors should be prepared to produce formal identification upon arrival which must be verified to the satisfaction of office/reception staff
- All visitors must state the purpose of their visit and the name of the staff member(s) who they are expecting to meet with
- All visitors are required to sign in and out upon arrival and departure from the site
- All visitors are required to wear an identification badge whilst attending the school/academy. ID badges are held on a colour coded lanyard which distinguish visitors based on whether the school/academy has received satisfactory clearance checks

If the visitor is unknown to the setting, the school/academy office/reception staff will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors to the school/academy who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:
- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at **all times**. We will not invite into the school/academy any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school/academy facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Any visitor who is not wearing an identity badge (and lanyard) and is found to be unaccompanied shall be challenged politely to enquire who they are and their reason for being at the school/academy. If the member of staff challenging the visitor deems the explanation to be sufficient, they should then escort the visitor to reception and ensure that they sign in and are issued with an identity badge. The incident should be reported to the Support Services Manager/DSL immediately.

In the event that the visitor refuses to comply, they **will** be asked to leave the site **immediately** and an emergency response call to the Principal/Headteacher (or most senior leader if the Principal/Headteacher is not available) is made. The Principal/Headteacher (or most senior leader if the Principal/Headteacher is not available) will consider the situation and decide if it is necessary to inform the police.

If an unknown/uninvited visitor becomes abusive or aggressive, an emergency response call is made to the Principal/Headteacher (or most senior leader if the Principal/Headteacher is not available) and the visitor **will** be asked to leave the site **immediately** and given a verbal warning that if they fail to leave the site immediately, the academy will contact the police to request their assistance.

Please refer to Appendix 5 for localised visitor safeguarding procedures.

Non-Collection of Children

Please refer to **Appendix 5** for details of localised procedures should a pupil/child not be collected at the end of the session/school day.

Missing Pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. Please refer to **Appendix 5** for details of localised procedures in the event that a pupil/child goes missing.

Searching, Screening and Confiscation

The Headteacher/Principal and designated staff member(s) have a statutory power to search a pupil or their possessions where they have reasonable grounds to suspect that the pupil may be in possession of a prohibited item. This must be inline with the 'Prohibited Items, Searching Pupils and Confiscation' section within the Trust wide Behaviour Policy and in conjunction with The Trust's Student Mental Health and Wellbeing Policy and Special Educational Needs and Disability (SEND) Policy.

When exercising their powers, the school/academy must consider the age and needs of pupils being searched or screened. This includes the individual needs or learning difficulties of pupils with Special Educational Needs (SEN) and making reasonable adjustments that may be required where a pupil has a disability.

The Headteacher/Principal should ensure that a sufficient number of staff are appropriately trained in how to lawfully and safely search a pupil who is not co-operating, so that these trained staff can support and advise other members of staff if this situation arises.

The Headteacher/Principal, in collaboration with the Designated Safeguarding Lead (or deputy), should authorise this process, in advance; details must be entered into the school/academy safeguarding system (CPOMS). If the designated safeguarding lead (or deputy) finds evidence that any child is at risk of harm, they should make a referral to children's social care services immediately.

An appropriate location for the search should be found. Where possible, this should be away from other pupils. The search must only take place on the school/academy premises or where the member of staff has lawful control or charge of the pupil, for example on a school trip.

A member of staff may search a pupil's outer clothing, pockets, possessions, desks or lockers. The person conducting the search must not require the pupil to remove any clothing other than outer clothing. 'Outer clothing' means any item of clothing that is not worn wholly next to the skin or immediately over a garment that is being worn as underwear, as well as hats, shoes, boots or scarves.

Before calling police into school/academy, staff should assess and balance the risk of a potential strip search on the pupil's mental and physical wellbeing and the risk of not recovering the suspected item. Staff should consider whether introducing the potential for a strip search through police involvement is absolutely necessary, and should always ensure that other appropriate, less invasive approaches have been exhausted. Once the police are on school/academy premises, the decision on whether to conduct a strip search lies solely with them, and the role of the school/academy is to advocate for the safety and wellbeing of the pupil(s) involved.

Unless there is an immediate risk of harm and where reasonably possible, staff should inform a parent of the pupil suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult. Parents should always be informed by a staff member once a strip search has taken place. The school/academy should keep records of strip searches that have been conducted on school/academy premises and monitor them for any trends that emerge.

Pupils should be given appropriate support, irrespective of whether the suspected item is found. If an item is found, this may be a police matter, but should always be accompanied by a safeguarding process handled by the school/academy which gives attention to the pupil's wellbeing and involves relevant staff, such as the DSL.

Safeguarding and Child Protection Policy	
Localised School Based Procedures	
School/Academy Name:	The Compass Academy
Headteacher/Principal:	Claire Horne
Designated Safeguarding Lead:	Holly Lockyer
Implementation Date:	September 2023

Introduction

In conjunction with the Trust wide Safeguarding and Child Protection Policy, localised procedures have been established to ensure that systems and procedures reflect the school/academy setting.

The localised procedures for the school/academy setting focuses on the following key areas:-

- Important Contacts
- Designated Safeguarding Lead and Absence Procedures
- Children's Social Care
- Children's Mental Health Crisis Team
- Identifying Possible Mental Health Concerns
- Local Authority Designated Officer (LADO)
- Reporting Procedures for Pupils
- Pastoral Support for Pupils with SEN, Disabilities or Health Issues
- Looked-After and Previously Looked-After Children
- Support for Pupils who Identify as LGBTQ+
- Supervision of the Designated Safeguarding Lead
- Non-Collection of Children/Pupils
- Missing Children/Pupils
- Visiting Safeguarding Procedures

Should you have any concerns or questions relating to the localised procedures, in the first instance, please contact hello@com.hslt.academy

Please refer to the below for a list of important contacts for the school/academy regarding Safeguarding and Child Protection:

Important Contacts		
ROLE/ORGANISATION	**NAME**	**CONTACT DETAILS**
Chief Executive Officer (CEO)	Helen Winn	h.winn@hslt.academy
Chief Operating Officer (COO)	Wendy Munro	w.munro@hslt.academy
Headteacher/Principal	Claire Horne	c.horne@com.hslt.academy
Designated Safeguarding Lead (DSL)	Holly Lockyer	h.lockyer@com.hslt.academy
Deputy DSL(s)	Debbie Coyle	d.coyle@com.hslt.academy
Trust Director of Safeguarding	Kyle Immanuel	k.immanuel@hslt.academy
Local Authority Designated Officer (LADO)	Jacqueline Edhouse	LADO@hullcc.gov.uk Mob: 07710 119092 (preferred) Work: 01482 613372
Chair of Governors	Lynn Benton	chair@com.hslt.academy
Safeguarding Link Governor	Janet Spittal	j.spittal@com.hslt.academy
Channel Helpline	Hull contact: Mark.Charlton@hullcc.gov.uk	02073 407264

Please refer to the below for details of the school/academy's safeguarding team and their contact information:

Designated Safeguarding Lead and Absence Procedures
Relates to item 6.5.1 within the Trust Safeguarding and Child Protection Policy
Contact Information
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns, at The Compass Academy. Holly Lockyer is available face to face throughout the day from 8.15am to 4.15pm.   - If necessary, Holly Lockyer can also be contacted via email, out of hours on h.lockyer@com.hslt.academy
Deputy DSL
- In the event that the DSL is absent or otherwise occupied with another substantial safeguarding concern, the deputy DSL(s) will act as cover.   - Debbie Coyle will be available face to face throughout the day from 8.15am to 4.15pm.
Safeguarding Cover Staff
In the event that the DSL and deputy DSL(s) are not available, Claire Horne (Principal) will act as cover (for example, during out-of-hours/out-of-term activities).

Please refer to the below for details of the school/academy's local Children's Social Care arrangements:

Children's Social Care	
Relates to item 8.3.4 within the Trust Safeguarding and Child Protection Policy	
Please find details of how to report child abuse here: https://www.gov.uk/report-child-abuse-to-local-council	
Telephone Number:	01482 448879, option 4
Email Address:	EHASH@hullcc.gov.uk
Telephone Number for Early Help Assessment Team:	01482 448879, option 4
Email Address for Early Help Assessment Team:	EHASH@hullcc.gov.uk
Telephone Number for Urgent Referrals (outside of office-hours):	01482 300304
Email Address for Emergency Referrals:	https://childrensportallive.hullcc.gov.uk/web/portal/pages/home EHASH@hullcc.gov.uk

Please refer to the below for details of the local area crisis support team:

Children's Mental Health Crisis Team
Relates to item 8.10.5 within the Trust Safeguarding and Child Protection Policy

Telephone Number:	– During office hours (9-5): through to contact point on East Riding referrals on 01482 303810 and Hull referrals on 01482 303688. – Out of office hours: through to the Crisis Team on 01482 301701 option 2.
Email Address:	https://camhs.humber.nhs.uk/contact/#1

Please refer to the below for details of possible signs of mental health concerns in children that staff at the school/academy are advised to be aware of and to look out for:

Identifying Possible Mental Health Concerns
Relates to item 8.10.5 within the Trust Safeguarding and Child Protection Policy
The school/academy encourages staff to raise possible mental health concerns with the SENCO or the education welfare officer, where applicable. All mental health concerns are logged on CPOMS.
Staff may identify possible signs of mental health concerns in pupils including, but not limited to: ● Frequent sudden mood and behaviour changes ● Self-harming or threats of self-harm ● Unexplained physical changes, such as rapid weight changes (outside of expected 'growth' during puberty) ● Sudden decline in academic performance ● Sleeping problems or fatigue during lessons ● Noticeable changes in social habits, such as withdrawal or avoidance of other pupils ● Anxiety, panic attacks ● Decline in attendance to school ● Increase in emotional outbursts ● Substance abuse ● Strong feelings of irritability or anger

Please refer to the below for details of the LADO and how they can be contacted:

Local Authority Designated Officer (LADO)
Relates to item 8.11.8 within the Trust Safeguarding and Child Protection Policy

Name of LADO:	Jacqueline Edhouse
Telephone Number:	Mob: 07710 119092 (preferred) Work: 01482 613372
Email Address:	Jacquie.Edhouse@hullcc.gov.uk

Please refer to the below for details on how pupils at the school/academy are advised to report any safeguarding concerns they may be experiencing or concerns they may have about other children or staff:

Reporting Procedures for Pupils
Relates to item 12.4 within the Trust Safeguarding and Child Protection Policy
Pupils can report a safeguarding concern to any member of staff. This will be managed in the following way; ● Listen to and believe the child/young person. ● Allowing them time to talk freely and not asking leading questions. ● Staff have been informed to stay calm and not show that they are shocked or upset. ● Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner. ● Explain what will happen next and that you will have to pass this information on. Staff know not to promise to keep it a secret. ● Staff then write up your conversation, as soon as possible in the child's own words. Sticking to the facts, and not putting their own judgement on it and adding the information to CPOMS, going to find and tell Holly Lockyer DSL, or Debbie Coyle DDSL, that a disclosure has been added to CPOMS.

Please refer to the below for details of pastoral support available at the school/academy for pupils who are diagnosed with SEND or other health related safeguarding concerns:

Pastoral Support for Pupils with SEN, Disabilities or Health Issues
Relates to item 16.2 within the Trust Safeguarding and Child Protection Policy
Within school, we support students by providing; ● ELSA support sessions ● Behaviour Lead intervention (including the use of restorative practice) ● Family Liaison Officer providing home-school communication, care and support In addition, regular ongoing support and guidance is received from a number of professional agencies including: ● NHS Education Mental Health Practitioner Team ● NHS School Nursing Team ● Hull Local Authority Educational Psychology Service ● ELSA Support Network The NHS Education Mental Health Practitioner Team offers guidance and support to pupils with presenting emotional and mental health needs, this is in addition to the NHS School Nursing team who attend the school site on a weekly basis. Further training and advisory support is also sought from the Hull Local Authority Educational Psychology Service through termly Person Centred Meetings (PCM). Staff supervision and up to date guidance is also received through the ELSA (Emotional Literacy Support Assistant) support network, which is also coordinated through the Hull Local Authority Educational Psychology team.

Please refer to the below for further details on the school/academy's approach to LAC and PLAC and how these pupils are supported to achieve their potential:

Looked-After and Previously Looked-After Children	
Relates to item 18.4 within the Trust Safeguarding and Child Protection Policy	
Please see below details of the designated teacher responsible for promoting educational achievement in LAC and PLAC as well as examples of local support mechanisms they offer.	
Designated Teacher:	Holly Lockyer
Support Mechanisms:	Regular 1:1 check ins with Designated Teacher to complete 'CYP Views' sections of PEP documentation Holly Lockyer teaches all LAC/PLAC pupils and as such is aware of learning needs and differentiation required for these pupils, to meet their specific needs. In addition; ELSA support sessions are available. Behaviour Lead intervention (including the use of restorative practice) as and when required and Family Liaison Officer providing home:school communication, care and support with parents/carers/our young people.

Please refer to the below for details of support available at the school/academy for LGBTQ+ pupils:

Support for Pupils who Identify as LGBTQ+
Relates to item 19.4 within the Trust Safeguarding and Child Protection Policy
● Safe spaces are readily available within the academy. There is an identified 'calm room' on each of our zones to allow pupils time and space as and when this is required. ● In addition a member of SLT is also based on each zone, to allow for check-ins and confidential conversations if necessary. ● Rachael Murray, ELSA/Emotional Wellbeing Lead is also available to provide pastoral support when required. ● Debbie Coyle (Family Liaison) is the designated staff lead to provide additional support between home and school. ● If necessary, external support and specialist guidance will be sought for pupils according to their individual needs.

Please refer to the below for details of person(s) responsible for the supervision (line management) of the DSL and how the DSL is supported to fulfil their role within the school/academy:

Supervision of the Designated Safeguarding Lead	
Relates to item 24.2.4 within the Trust Safeguarding and Child Protection Policy	
Line Manager of the DSL (and their role):	Claire Horne, Principal.
Support/Supervision Provided:	Weekly meetings between Holly Lockyer and Claire Horne take place to provide supervision and support. In addition, support is available through the Ellesmere Centre.

Please refer to the below for details of the school/academy's procedures in the event of a child not being collected from the school/academy:

Non-Collection of Children/Pupils
Relates to Appendix 3 - Specific Safeguarding Issues
- Children at the school are transported in one of the following ways: taxi, parent/carer drop off/collection, public transport.   - As a secondary provision for pupils aged 11-14, children typically travel independently and transport themselves to school.   - If a child is not collected, the Tutor would make an initial call to the parent/carer to seek guidance as to whether they were on their way to school for collection.   - If collection was not possible by the parent/carer, arrangements would be made to take the child home. This would be either within the school car or by a member of staff with business insurance, once contact had been made with the parent/carer to ensure that someone was present within the home to receive the child or routines are established that a child can remain at home unsupervised.   - Should contact not be possible, the DSL/Deputy DSL would continue to attempt contact with the parent/carer. An initial home visit before taking the child home may be appropriate, depending on the circumstances if no contact is made. This would be recorded on CPOMS.   - In the event that contact is not possible with parents/carers and alternative arrangements need to be made, advice would be sought from social care representatives.

Please refer to the below for details of the school/academy's safeguarding procedures in the event of a child going missing/being absent from education:

Missing Children/Pupils
Relates to Appendix 3 - Specific Safeguarding Issues
Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. As an Academy we recognise that pupils with Social Emotional and Mental Health (SEMH) difficulties experience a range of different physiological and psychological challenges within their daily life. All pupils who attend Compass join us for their own reasons and have their own previous experiences. As a result, pupils at the Compass Academy will occasionally display flight behaviours as a response. Pupils are supervised by members of staff at all times throughout the school day; however, Compass Academy is not a fully secured site. A pupil is considered to have 'absconded' if they intentionally / knowingly leave the school site or the immediate area of an off-site activity without permission. To keep pupils safe, staff should adhere to the following procedures: At all times a pupil's age, state of mind and vulnerability of the child should be considered. **First Response**   - If a pupil is in the early stages of a crisis, staff should follow the child's PHP to help them to feel safe.   - If a pupil absconds from the school site, staff should immediately inform the Reception team for an absconding log to be started, and maintain sight of the pupil until support arrives (if appropriate)   - The aim will always be to co-ordinate the recovery of the pupil back to the school site.

Second Response
- If a pupil absconds and cannot be seen by a member of staff they are considered to be missing.
- If a pupil is missing, the SLOs should be called to conduct an immediate search of the site.
- If a pupil is not on site, a sweep of the school field and immediate local area will be conducted.
- If the pupil is not located and recovered on the first sweep, parents/carers will be informed.

Third Response
If a pupil is not located during the first or second response procedure and the time has extended beyond what is deemed suitable by a dynamic risk assessment (a maximum of 30 minutes), we will report the missing pupil/s to parents and the police and, where possible, continue to search the local area

For pupils who regularly abscond, this information will be noted on their PHP and a risk assessment formed to mitigate risks presented.

Please refer to the below for details of the school/academy's specific visitor safeguarding procedures:

Visitor Safeguarding Procedures
Relates to Appendix 3 - Specific Safeguarding Issues
All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in using the digital system and wear a visitor's badge that will be printed for them. Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and: - Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or   - The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)   All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff. A copy of any publications shared with pupils is requested prior to any visit, as per the Academy's Provider access policy.