Safeguarding Policy

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1. Introduction

1.1 The academy is committed to safeguarding and promoting the welfare of pupils by providing a secure environment in which children can learn in safety.

1.2 Accordingly, governors and the senior leadership team will ensure that everyone working in school:

- understands their responsibilities as set out in the current 'Keeping Children Safe in Education' (KCSIE) document; and

- will facilitate a whole school approach whereby safeguarding and child protection underpin all relevant policy and processes with the best interests of the child at heart.

1.3 The academy takes a zero-tolerance approach to all forms of abuse, including neglect, degrading treatment, disproportionate restraint and the unauthorised deprivation of a person's liberty. Even when no cases of relevance have been reported or recorded, staff must not take the view that it does not (or could not) happen in our academy.

1.4 This policy, of which the core elements are **prevention**, **protection**, and **support**, offers a child-centred and co-ordinated approach to safeguarding in line with national guidance and is designed to ensure that the actions of any member of staff in our academy are both transparent and in full accordance with our aims. By giving clear direction about the expected behaviour of staff, including their individual responsibilities when managing safeguarding concerns, this policy forms a fundamental element of the academy's approach to providing excellent pastoral care over and above the academic support afforded to our pupils.

1.5 These arrangements are further supported by providing a broad and balanced curriculum, which includes teaching pupils to recognise when they are at risk and how to access help when they need it.

2. Purpose and scope

2.1 The Education Act 2002 remains the primary legislation to which schools and academies must have regard in furtherance of their duties.

2.2 Section 175 of the Education Act 2002 requires governing bodies of maintained schools and FE colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. Similarly, regulations made in accordance with Section 157 of that Act state that independent schools (the definition of which includes academies and free schools) must ensure arrangements are in place to safeguard and promote the welfare of pupils.

2.3 Safeguarding is not graded specifically in the Ofsted Education Inspection Framework (EIF) but it will be referenced in the Leadership and Management section of any report published by Ofsted following inspection of a school, and this will always state whether arrangements for safeguarding learners are effective.

2.4 This policy is principally written in accordance with the government documents 'Keeping Children Safe in Education (KCSIE) 2023', 'Working Together to Safeguard Children', 'What to do if you are Worried a Child is Being Abused' and, for additional context, has drawn on the

content of the documents 'Sexual Violence and Sexual Harassment between Children in Schools and Colleges' and 'Teaching online safety in school'.

2.5   Compliance with the content of this policy does not exempt any relevant individual from the absolute requirement to familiarise themselves with (by reading and understanding) the content of KCSIE.

2.6   The policy is applicable to all staff and associates of the academy, including governors, trainees, volunteers and visitors.

3.   Definitions

3.1   Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- 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; and

- taking action to enable all children to have the best outcomes.

3.2   Safeguarding, and promoting the welfare of children, represents a significantly broader term than child protection. Child protection is merely one element of safeguarding and refers to activities undertaken to prevent children suffering (or being likely to suffer) significant harm (and it should be noted that harm can include ill-treatment that is not physical, as well as the impact of witnessing ill-treatment of others, for instance in relation to the impact on children of domestic abuse).

3.3   Throughout this policy reference may be made to 'children', 'young people' and 'pupils' (or 'students'). These terms are effectively interchangeable, and all refer to persons under the age of 18 years studying at the academy. However, the principles of this document apply to professional behaviours towards all pupils, **including those over the age of 18 years**.

3.4   Throughout this policy reference to 'staff' or 'adults' includes all of the following: teachers; support staff; governors; trainees; volunteers; and anyone working in, or on behalf of, the academy, whether in a paid or unpaid capacity.

3.5   Throughout this policy reference to the term 'Designated Safeguarding Lead' (or DSL) means the senior member of staff who has been allocated lead responsibility for safeguarding within school. The DSL will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) and this should be made explicit in the role holder's job description.

3.6   The DSL will work collaboratively with the local team of safeguarding partners* and will ensure that all staff working with children are able to recognise signs which may indicate possible abuse or harm and will know how to act appropriately when indicated.

*These comprise the local authority; the integrated care system (previously known as the clinical commissioning group) for an area within the local authority; and the chief officer of police for a police area in the local authority area. Together, these statutory safeguarding partners will implement new strategies to improve the provision of safeguarding and child protection arrangements in the local area.

3.7   The team of statutory safeguarding partners (as defined above) will work together and will also engage with any locally relevant agencies to safeguard and promote the welfare of children in their defined locality including identifying and responding to their needs.

3.8   The safeguarding partners will have published a local threshold document and a local protocol for assessment which will apply when dealing with safeguarding cases at school. Staff should be encouraged to ask the DSL for further information about this protocol.

3.9   Throughout this policy reference to the term 'allegation' means any information that suggests a teacher or member of staff (this includes agency and supply staff, contractors and volunteers) has:

- behaved in a way that has harmed a child, or may have harmed a child;

- possibly committed a criminal offence against or related to a child;

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children*.

    The rationale for the fourth bullet point is transferrable risk: if a member of staff is involved in an incident away from work which (even if no children were involved) is assessed to have an impact on their suitability to work with children (for example, domestic violence) schools require to consider what triggered these actions and whether a child in school could trigger the same reaction, thus representing a child being put at risk.

3.10   In relation to children at risk of abuse and neglect, including sexual abuse or exploitation, grooming and/or radicalisation, the following definitions are detailed in KCSIE, which also suggests that assessments of children should be holistic (or contextual) in considering the wider environmental factors affecting their life as these may contribute to the risks to their safety and welfare.

3.11   Abuse (which can be separated into different categories, as itemised in the following section) is defined as representing a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm, and certain categories of abuse may breach children's rights as set out in legislation such as the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).

3.12   Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (such as via the internet – abuse can take place wholly online, or technology may be used to facilitate offline abuse). Children may be abused by an adult or adults or by another child (or children), the latter representing child-on-child abuse (further discussed and defined below).

3.13   In some cases, abusers are not motivated to abuse before joining an organisation (for instance by gaining employment in a school) and are therefore less likely to be flagged through an employer's safer recruitment checks. Reducing opportunism is therefore key to reducing risk, and this is enhanced by the creation of cultures in which concerns are reported.

3.14   There is the notion of a progression of boundary violations towards abuse. Violations can be conscious and part of a planned grooming process or can (at least initially) be innocent and with good intention. However, once boundaries are broken, it becomes increasingly difficult to

restore the relationship to an appropriate one and it is therefore incumbent upon senior management to ensure the encouragement of an open dialogue about safeguarding practice.

3.15 This involves taking seriously any matters that are brought to the attention of the school, or any member of its staff, by ensuring that robust procedures are in place which not only encourage reporting of concerns, but which also provide an adequate response to any issues which may be raised.

3.16 In this context, staff may be required to exercise judgement not only over what obviously constitutes a significant concern, but also those which are less clear cut, the latter being referred to in KCSIE as 'low-level' concerns.

3.17 A low-level concern is defined as any concern that an adult working in the academy may have acted (towards children) in a way that is inconsistent with the staff code of conduct (including outside of work) but does not meet the harm threshold or is otherwise not sufficiently serious to warrant referral to the Local Authority Designated Officer (LADO).

4. Categories of abuse

4.1 **Neglect**

4.1.1 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 (and this may occur during pregnancy, for example as a result of maternal substance abuse).

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

- protect a child from physical and emotional harm or danger
- provide adequate food, clothing and shelter (including exclusion from home)
- ensure adequate supervision (this includes the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- provide an adequate response to a child's basic emotional needs.

4.1.3 This is not an exhaustive list and it must be recognised that it is not the role of academy staff to make an assessment as to whether children or young people have suffered harm.

4.1.4 All members of staff (not only the DSL) have a duty to report any concerns about harm in accordance with the guidelines and procedures of the local team of safeguarding partners.

4.2 **Physical Abuse**

4.2.1 Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

4.2.2 Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

4.3 **Emotional Abuse**

4.3.1   Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

4.3.2   It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

4.3.3   Such expectations may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

4.3.4   Emotional abuse may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

4.3.5   Some level of emotional abuse is involved in all types of ill-treatment of a child though it may occur in isolation.

4.4 **Sexual Abuse**

4.4.1   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, and irrespective of whether or not the child is aware of what is happening.

4.4.2   Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children (the latter practice being referred to as child-on-child abuse – see below).

4.4.3   Sexual activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

4.4.4   Sexual violence involves the criminal sexual offences defined in the Sexual Offences Act 2003, whilst sexual harassment is defined as unwanted conduct of a sexual nature – this can include online behaviour.

4.4.5   It should be noted that both sexual violence and sexual harassment (which exist on a continuum and may overlap) can occur both online and offline, and throughout primary and/or secondary education between two (or more) children of any age or sex.

4.4.6   In this context, KCSIE notes that children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent.

4.4.7   Developmental damage may be caused by problematic, abusive and violent sexual behaviour which is developmentally inappropriate. A useful umbrella term is 'harmful sexual behaviour' (HSB) – this term has been widely adopted in child protection and is used in this advice. HSB, which can occur online and/or face-to-face, should be considered in a child protection context as and when relevant.

4.4.8   Children who are victims of sexual violence and sexual harassment (both physical and verbal, with evidence showing that girls, children with SEND, and LGBT children are at greater risk) will likely find the experience stressful and distressing, and this is likely to adversely affect their educational attainment.

4.5   **Child-on-child abuse**

4.5.1   This is defined as abuse of a child (or children) by another child (or children), not necessarily of the same age. This can manifest as multiple forms of abuse (including that occurring within intimate partner relationships) such as: bullying (including cyberbullying); physical abuse; sexual (or gender-based) violence and harassment; consensual and non-consensual sharing of nude and semi-nude images (also known previously as sexting or youth produced sexual imagery); upskirting; and initiation type violence and/or rituals.

4.5.2   Since 2019, upskirting has been accorded the status of a criminal offence, referred to as voyeurism. Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of obtaining sexual gratification and/or causing the victim humiliation, distress or alarm, and if a pupil is concerned that they have been the victim of upskirting by a fellow pupil, schools should ensure that staff follow the academy's processes for dealing with child-on-child abuse by speaking to the DSL.

4.5.3   Child-on-child abuse may be capable of meeting the threshold for the recording and investigation of criminal offences by the police, and this is particularly likely to be relevant in relation to sexual violence and sexual harassment.

4.5.4   KCSIE specifies that all staff members require to be made aware of, and remain vigilant to recognise, and to prevent, child-on-child abuse (which, although not stated as such in that document, is the form of abuse that they are most likely to be in a position to encounter and address in a constructive manner).

4.5.5   Accordingly, all staff require to be clear that whilst the response to such issues may include behaviour management processes, there is also a need for this information to be shared with the DSL in order to address the underlying safeguarding concerns.

4.5.6   It should be noted that in relation to safeguarding issues relevant information may legitimately be shared without consent where it is not possible to gain consent.

4.5.7   The DfE has published guidance to support schools and academies in their management of situations of this nature. The relevant guidance can be accessed at:

4.6 Child sexual exploitation (CSE)

4.6.1 Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of eighteen (including those aged sixteen and seventeen who can legally consent to have sex, or indeed to marry) into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

4.6.2 The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology.

4.6.3 The above definition may also include human trafficking (for sexual purposes) and forced marriage. In CSE there is an imbalance in the relationship as the perpetrator holds some kind of power over the victim.

4.6.4 CSE can involve varying degrees of coercion, intimidation or enticement, sexual bullying, cyberbullying and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse and indeed it may occur without the child or young person's immediate knowledge.

4.7 Child criminal exploitation (CCE)

4.7.1 Similarly, child criminal exploitation is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

4.7.2 It is recognised that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity in which drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. It is also known that the experiences of girls can be very different to boys and staff should be alert to this.

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

4.7.4 CCE can (as with CSE) involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

4.7.5 Victims can be exploited even when activity appears consensual and it should be noted that exploitation is not limited to being physical but can equally be facilitated and/or take place online.

4.7.6   KCSIE includes reference (of which staff should be aware) to unexplained 'missing episodes' (from both home and school) as not infrequently being indicative of involvement in criminal activity related to illicit drug distribution (and being at increased risk of modern slavery, trafficking and/or sexual exploitation). Accordingly, all staff are required to be alert to additional indicators which may signal that children are at risk from, or possibly involved with, serious violent crime.

4.7.7   Such indicators (some of which are applicable to CSE as well as to CCE) include children who:

- suffer from a significant decline in academic performance;

- appear with unexplained gifts or new possessions;

- associate with older individuals or groups, or with other young people involved in exploitation;

- suffer from changes in emotional well-being, or misuse drugs and/or alcohol;

- display signs of self-harm, assault or unexplained injuries;

- having experienced child maltreatment and been involved in offending;

- go missing for periods of time or regularly come home late (especially if they are male); and/or

- regularly miss school or education or do not take part in education.

4.7.8   Senior management and the DSL should familiarise themselves with the current Home Office County Lines advice and guidance. This information can be found at https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-countylines. Additional government guidance includes 'Preventing youth violence and gang involvement - Practical advice for schools and colleges (publishing.service.gov.uk), which contains helpful information on combatting gangs and organised criminal networks involved in the exploitation of children, including in relation to the illegal movement and marketing of drugs.

4.8   Cybercrime

4.8.1   Cybercrime is criminal activity committed using computers and/or the internet, which can equate to abuse if children are involved. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber-dependent' (crimes that can be committed only by using a computer).

4.8.2   Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or to alter grades awarded;

- denial of service (DoS or DDoS) attacks or 'booting'; and

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware etc.

4.8.3   Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing.

4.8.4   Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety.

4.8.5   Additional online advice can be obtained from agencies such as National Crime Agency (NCA), National Police Chiefs' Council (NPCC) and National Cyber Security Centre (NCSC).

4.9   'Honour-based' abuse (HBA)

4.9.1   So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

4.9.2   Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

4.10   Female genital mutilation (FGM)

4.10.1   FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and represents a form of child abuse with long lasting harmful consequences.

4.10.2   Professionals in all agencies and individuals need to be alert to the possibility of a girl being at risk of FGM or having already suffered from FGM. Victims of FGM are more likely to come from a community that is known to practice FGM.

4.10.3   The FGM Act 2003 (section 74 of Serious Crime Act 2015) places a statutory duty upon teachers (and certain other professionals) to report to the police where they discover, either through disclosure or visual evidence (although this does **not** mean that teachers should be examining pupils) that FGM has been carried out on a girl under 18 years.

4.10.4   Failure to report such cases will lead to disciplinary action. In reality the teacher should consider and discuss the case with the DSL and involve the LADO as appropriate.

4.10.5   Professionals should note that girls at risk of FGM may not yet be aware of the practice (or that it may be conducted on them) so sensitivity must always be shown when approaching the subject. Risk factors for FGM (or warning signs that this may be about to take place or may already have taken place) are detailed within the Multi-Agency Practice Guidelines, which outline additional considerations for schools (in common with colleges and universities). Further information can be found at www.gov.uk/government/publications/female-genital-mutilation-guidelines.

4.11 **Forced marriage**

4.11.1 A forced marriage is one which is entered into without the full and free consent of one or both parties and where violence, threat or any other form of coercion is used to cause a person to enter into a marriage. Such threats can be physical and/or emotional and/or psychological.

4.11.2 It is now a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or coercion are not used, and this is applicable to non-binding, unofficial 'marriages', as well as legal marriages.

4.11.3 A lack of full and free consent can be applicable where a person does not consent, or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities can use religion and culture as a way of coercing a person into marriage, and schools and colleges can play an important role in safeguarding children from forced marriage.

4.11.4 The Forced Marriage Unit has published multi-agency guidelines, with a dedicated section focusing on the role of schools and colleges. If in need of additional advice or information, school and college staff can contact the Forced Marriage Unit by telephone: 020 7008 0151 or by email: fmu@fco.gov.uk.

4.12 **Radicalisation**

4.12.1 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups, and extremism is the vocal or active opposition to our fundamental values including democracy, rule of law, liberty and the mutual respect and tolerance of different faiths and beliefs.

4.12.2 Children are vulnerable to extremist ideology and radicalisation and, similar to protecting them from other forms of harm and abuse, protecting children from this risk should be part of a school's safeguarding approach.

4.12.3 Under the **Prevent duty** all schools have a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard' to the need to prevent people from being drawn into terrorism. This is known as the Prevent duty, on which the DfE has published guidance for schools, and accordingly designated safeguarding leads and other senior leaders in schools should familiarise themselves with the Revised Prevent duty guidance: for England and Wales paragraphs 57 to 76, which are specifically concerned with schools (and which also cover childcare).

4.12.4 The academy has clear procedures in place for protecting pupils at risk of radicalisation and will ensure that staff have a general understanding of the risks affecting pupils in addition to providing guidance in how to identify those pupils and how to support them.

4.12.5 The academy will undertake the following requirements to:

- assess the risk of pupils being drawn into terrorism (which includes support for extremist ideals that are part of terrorist ideology)

- ensure that their safeguarding arrangements take into account the policies and procedures of the local team of safeguarding partners

- ensure that the DSL undertakes appropriate Prevent awareness training and provide advice and support to other staff members on protecting pupils from the risk of radicalisation

- ensure that pupils are safe from terrorist and extremist material by putting in place suitable filtering mechanisms for accessing the internet, and in addition teach pupils about online safety.

4.13 **The Channel programme**

4.13.1 The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned on this account.

4.13.2 The local authority will have in place a Channel panel, chaired by the authority, which includes the police. The academy will co-operate with this panel and will make a referral to this body where a pupil is identified as being vulnerable to being drawn into terrorism.

4.13.3 The pupil will be supported throughout this process (subject to appropriate and necessary consent being obtained).

4.13.4 The DSL should consider if it would be appropriate to share any information with a new school or college in advance of a child leaving. Statutory guidance on Channel is available at Channel and Prevent Multi-Agency Panel (PMAP) guidance.

4.14 **Additional definitions**

4.14.1 This policy is not designed to function as a dictionary, and provision of additional definitions (without limitation) would render it impractically lengthy, but should further, more detailed, definitions be desired for terms such as domestic abuse and relationship abuse (neither of which, in common with forced marriage, is legally applicable – at least in the UK – to children under the age of 16) these can be accessed directly from KCSIE. However, for the sake of clarity, a brief description pertinent to the above is offered in the following clauses.

4.14.2 Domestic violence and abuse is the term applied to any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those **aged 16 or over** who are, or have been, intimate partners or family members regardless of gender or sexuality. Within this category such abuse can encompass, but is not limited to, the following elements:

- psychological

- physical

- sexual

- financial

- emotional.

4.14.3 The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of this on children as victims in their own right, if they see, hear or experience the effects of abuse.

4.14.4 Additional resources are available to help schools identify the signs of domestic abuse, including online links provided by, for instance, organisations such as NSPCC, Refuge and SafeLives.

5. Data sharing

5.1 It is recognised that all matters relating to child protection are confidential. However, a member of staff must never give a guarantee of confidentiality to a pupil.

5.2 Where there is a child protection concern this will be passed immediately to the Designated Safeguarding Lead (DSL) and/or to the Local Authority Designated Officer (LADO).

5.3 The DSL will take advice from the LADO (and additionally, as and when relevant, from the police and/or local authority children's social care services) to agree the following:

- who needs to know and, importantly, exactly what information may be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can reasonably be given to the wider community to reduce speculation; and
- how to manage press interest (should this be necessary).

5.4 All staff must be fully aware that information sharing is vital in identifying and tackling all forms of abuse and neglect and accordingly it is their professional responsibility to share information with other agencies in order to safeguard children.

5.5 As part of meeting a child's needs, it is important for governing bodies to recognise the importance of information sharing between practitioners and local agencies, and KCSIE is very clear that "*The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.*" (However, it must also be noted that, according to KCSIE, the above principle does not prevent schools from withholding education data where the 'serious harm test' under the legislation is met. In other words, it is permissible to withhold such data where, for example, this would be in the interests of a child in a refuge or another form of emergency accommodation.)

6. School responsibilities

6.1 The academy will work closely with local authority social care, police and health services to safeguard and promote the welfare of all pupils by providing a safe and secure environment in which pupils can learn. All pupils are given the best opportunity to talk freely to any member of staff if they have any worries or concerns.

6.2 The academy will support all pupils by:

- ensuring the content of the curriculum includes social and emotional aspects of learning

- ensuring a comprehensive curriculum response to e-safety, enabling children and parents/carers to learn about the risks (as well as the benefits) of new technologies and social media and how to use these responsibly

- ensuring that child protection is included in the curriculum to help children stay safe, recognise when they do not feel safe and identify who they might or can talk to

- ensuring (in relation to staff appointments) that at least one person conducting an interview has completed safer recruitment training

- signposting pupils to (a number of) appropriate adults who may be approached if the pupil is experiencing difficulties

- promoting the child's development in ways that will foster security, confidence and independence

- encouraging development of self-esteem and self-assertiveness whilst not condoning aggression or bullying

- ensuring repeated hate incidents (including racist, homophobic, gender or disability-based bullying) are addressed under child protection procedures

- liaising and working constructively with other support services and agencies involved in the safeguarding of children

- monitoring children who have been identified as having welfare or protection concerns (including those perceived to be at risk of radicalisation) and ensuring that they are provided with appropriate support

- maintaining up-to-date details of numbers on which family members can be contacted in an emergency (and it is now considered good practice for more than one emergency contact number to be held for each child).

6.3 In so doing, the academy will remain conscious at all times of its responsibilities in relation to the Equality Act 2010, and will be mindful of the need not only to ensure that no discriminatory behaviour occurs, but also to make reasonable adjustments by means of positive action where appropriate, for instance by amendment of safeguarding policies and procedures where children with protected characteristics are perceived to be at greater risk of harm.

6.4 The academy will support staff by the provision of regular training to help them to recognise, and act appropriately upon, any signs which might indicate issues relating to safeguarding or child protection, include ensuring that all staff know how to respond to any disclosure from a pupil (or a third party) which might potentially identify a safeguarding or child protection issue.

6.5 Any new member of staff will undergo appropriate induction which will include familiarisation with the overall concepts and practicalities of safeguarding as applicable to their individual role, including the identity and contact details of the DSL. In this way the school will ensure that all members of staff are fully aware of their responsibilities.

6.6 The academy will also ensure, where children are being asked to learn online, that staff are signposted to advice provided by the DfE to support in safeguarding both teachers and pupils).

6.7 Government advice is that school contact with parents and carers during any period when online learning is being promoted can also be used to reinforce the importance of children staying safe online, and in this context it is important for parents and carers to be aware of

what their children are being asked to do, including details of the sites they will be asked to use and the school staff with whom their children will interact.

6.8 Schools should emphasise the importance of a safe online environment and encourage parents and carers to set age-appropriate parental controls on digital devices and use internet filters to block malicious websites. Online content which may be considered harmful and/or inappropriate may be legal or illegal, and could include the following: pornography; promotion of self-harm and/or suicide; misogyny; racism; fake news; extremist views; etc.

6.9 A senior member of staff has been appointed to be the academy's DSL. This person will direct and support other staff in managing safeguarding concerns, including ensuring that all staff working with children are aware of signs which may indicate possible abuse or harm, and will be familiar with the requirement for children to be accompanied by an 'appropriate adult' in the event of a police investigation and related attendance at school.

6.10 The DSL is also responsible for ensuring that school protocols and procedures are followed, including the requirement to ensure that, where children leave the school or college, their child protection file is transferred to the new school or college as soon as possible, and that this file is transferred separately from the main pupil file. The DSL must ensure secure transit of this file **and** must obtain (and record) confirmation of receipt by the new school or college.

6.11 It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the DSL and the role should be explicit in their job description. **Although the DSL may delegate elements of their role to appropriately trained deputies the ultimate responsibility for safeguarding and child protection cannot be delegated and remains with the DSL**.

6.12 The DSL (and any appointed deputies) will undertake refresher child protection training every 2 years and whole school staff training (including that of governors) will also be updated as appropriate. Staff training will include online safety training, and the requirement to ensure children are taught about safeguarding. In relation to teachers such training should take note of Teachers' Standards regarding managing effective student behaviours to ensure a good and safe educational environment.

6.13 The academy has additionally nominated a (named) governor to be responsible for child protection issues.

6.14 The academy will ensure that all members of staff (including agency and supply staff as well as governors, trustees and members) will undergo such prohibition and DBS (enhanced and standalone children's barred list) checks as are appropriate to their specific roles in accordance with legislation (full details, including how and where such information should be recorded, are provided within the academy's Recruitment Policy).

6.15 In relation to volunteers, the extent of such checks is dependent upon the degree of supervision in place and it is not appropriate for all such individuals to be subject to a blanket obligation to submit to a DBS check. It is, however, appropriate for a risk assessment to be undertaken by the school to determine the need for such a check and a record should be kept of both the date of this assessment and the outcome.

6.16 In accordance with KCSIE, the academy will give consideration to online searches on shortlisted candidates for employment (as well as individuals under serious consideration for

volunteer roles) as part of their due diligence checks (outlined in detail within the academy's Recruitment Policy – and it is good practice to inform shortlisted candidates, as suggested in that policy, that online searches will be carried out).

6.17 In relation to governance, it is a statutory requirement for academies, independent and free schools (and is now strongly recommended for all schools) that all governors appointed after 3 September 2018 are subject to both a DBS check (enhanced and barred list) **and** a section 128 (prohibition) check to ensure they are not barred from teaching (persons who are barred from teaching are also prohibited from taking part in the management of educational establishments).

6.18 KCSIE also requires any new governor to receive appropriate safeguarding and child protection training as part of their induction, not least to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective. It also specifies that all governors should receive regular updates on their safeguarding training.

6.19 Within our academy, a culture will be promoted which enables all staff members to raise, without fear of repercussion, any concerns they may have about the management of safeguarding and/or child protection in the school. This may include raising concerns about decisions taken by colleagues or their actions (or inactions) in relation to individual children. If concerned, staff members should raise such matters with the DSL and/or the headteacher.

6.20 All staff should know how to recognise and act upon indicators of abuse or potential abuse involving children, should know how to address concerns about a child's welfare and should be clear as to the identity of the academy's DSL and any appointed deputy or deputies.

6.21 In relation to child-on-child abuse, the academy will take positive steps to reduce incidences and minimise risk by investigating, dealing with and fully documenting all allegations as and when they arise and by ensuring that all staff are aware that there will be zero tolerance of abuse of this (or indeed any other) nature.

6.22 All staff will be advised how to access up to date child protection training.

6.23 The academy's induction programme for new members of staff (including agency staff) will include basic safeguarding information relating to:

- signs and symptoms of abuse (including child-on-child abuse)
- how to manage a disclosure from a child
- how to record concerns
- the identity of those persons to whom relevant information should be passed.

6.24 The induction programme will also ensure both that all staff (again including agency staff) are familiar with the following academy documents:

- child protection policy;
- behaviour policy;
- staff code of conduct; and
- safeguarding policy (including reference to the response to children who go missing from education)

and that they are familiar with the identity of the DSL and of any deputies.

6.25 It will also ensure that they are familiar with the role of the DSL and that they have read and understood (as a bare minimum) part one of KCSIE (a copy of which should be provided to staff at induction, along with copies of the policies mentioned in the preceding clause) although those staff who do not work directly with children may instead be advised to read and understand (as a minimum) the condensed version of part one (Annex A of KCSIE).

6.26 If individuals are engaged from an agency or third-party organisation to work within the academy, written notification will be obtained from that agency or organisation to confirm that the relevant checks have been carried out, and the identity of the person presenting themselves for work will be verified to ensure that this is the individual on whom those checks have been made.

6.27 The academy will ensure volunteers and governors (in addition to all members of staff) will know how to respond to a pupil who discloses abuse (or what to do when such concerns are raised by a third party).

6.28 The academy will ensure that all members of staff, including volunteers and governors, will similarly know what action to take in the event of being alerted to concerns in relation to potential radicalisation and will be familiar with recommended procedures to be followed.

6.29 The academy will ensure that staff feel able to raise concerns about poor or unsafe practice and potential failures in the academy's safeguarding practices. In this context, the academy recognises that where a staff member feels, having raised the issue with senior management, that their genuine concerns are not being addressed, they may wish to consider whether it is appropriate to raise their concerns under whistleblowing procedures.

6.30 The academy will maintain up-to-date details of numbers on which family members can be contacted in an emergency (and it is now considered good practice for more than one such emergency contact number to be held for each child).

6.31 In the event of a school placing a pupil with an alternative provider, the school remains responsible for the safeguarding of that pupil and should satisfy themselves that all necessary safeguarding checks have been carried out on those working in that establishment.

6.32 Where the academy hires out their facilities it should ensure that robust arrangements are in place to keep children safe, and where the academy uses other premises for use by their children, senior staff should seek assurance that relevant safeguarding and child protection policies and procedures are in place.

6.33 Similarly, in the event of sending pupils on work experience, the school is responsible for ensuring that the provider of such experience has appropriate safeguarding policies and procedures in place.

7. Staff responsibilities

7.1 All staff are advised to maintain an attitude that '**it could happen here**' where safeguarding is concerned and in particular to remain alert to the fact that sexual violence and sexual harassment can occur between two children of any age.

7.2 Where staff fail to recognise or even downplay some behaviours related to abuse this can lead to a culture of unacceptable practice and an unsafe environment. It is incumbent upon all staff to follow appropriate procedures in dealing with these safeguarding concerns.

7.3 All adults working in the academy (not only employees but also governors, trainees and volunteers) require to be alert to the potential abuse of children, both within the child's own family and by other perpetrators, including the possibility of abuse by school staff.

7.4 The academy will create a culture which is transparent where staff who have concerns about colleagues (including low-level concerns, defined as any concern that an adult working in the academy may have acted in a way that is inconsistent with the staff code of conduct – including actions outside of work – but does not meet the harm threshold or is otherwise not sufficiently serious to warrant referral to the LADO) are comfortable in disclosing their concerns to the appropriate person so that these can be dealt with appropriately.

7.5 All staff should know how to recognise and act upon indicators of abuse or potential abuse involving children (including child-on-child abuse) and should know how to address concerns about a child's welfare. There is a responsibility for all staff members to respond to any suspected or actual abuse of a child in accordance with school procedures (and in line with government legislation).

7.6 It is therefore important that staff are aware that how they (or the school) respond to a child reporting concerns of this nature can affect the confidence of future victims of sexual violence and sexual harassment in coming forward to reporting their concerns. Accordingly, KCSIE states that a victim should be reassured that they are being taken seriously (regardless of the length of time taken to come forward) and that they will be supported and kept safe.

7.7 Additionally, KCSIE emphasises the importance of explaining to children that the law is in place to protect rather than criminalise them, and the requirement to understand intra-familial harms, and provide any necessary support for siblings following incidents, as well as being part of discussions with statutory safeguarding partners.

7.8 All staff must (as a bare minimum) read (and understand) part one of KCSIE although those staff who do not work directly with children may instead be advised to read (and understand) the condensed version of part one (Annex A of KCSIE). It should additionally be common knowledge that **all** staff members must share in responsibility for ensuring that school buildings and grounds are kept secure and that any concerns that may come to light must be reported promptly to the appropriate person.

7.9 All staff must be aware that abuse of any sort is never to be tolerated or attributed to 'banter' (particularly between children). All abuse (including child-on-child abuse) is to be addressed seriously and in accordance with the academy's protocols and procedures, which include full documentation of any identified episodes and measures of appropriate support to victims and perpetrators alike.

7.10 Additionally, staff should have 'due regard' to the need to prevent children and young people from being drawn into terrorism under the Prevent duty (July 2015) and should always act in the best interests of the child in these circumstances.

7.11 Both management and staff should be aware that disqualification 'by association' is now only applicable in domestic premises, rather than educational establishments, and it is no longer

appropriate (or justified) to ask staff about convictions or cautions of persons who live or work in the same household as them.

7.12   Nonetheless, staff in schools who are working in what is technically childcare (as opposed to education) may still be disqualified on their own account. This can be not only due to DfE sanctions or disqualifications related to offences committed by themselves but also as a result of having had formal proceedings taken against them in respect of (their own) children being taken into care or being subject to a court order or having their own registration for childcare or fostering cancelled (other than for non-payment of fees) or refused.

7.13   In terms of childcare, relevant members of staff include those working with children of reception age or younger as well as those working with children between five and eight years old in an out-of-school setting (such as breakfast clubs or afterschool care). An appropriate form for completion by such staff will be found within the academy's Recruitment Policy. (Technically it is not necessary for staff members to complete a form: asking them to self-declare any issues of relevance is deemed sufficient but schools may prefer to document the process.)

7.14   Similarly, all educational establishments should be aware of government guidance to the effect that schools should remind **all** staff (not just those working with children under the age of eight) that their 'relationships and associations' (including those online) may have an implication for the safeguarding of pupils, and that if there are concerns that such contacts may be of relevance then the school should be made aware.

7.15   Schools should ensure that staff understand their duty in this regard and should include guidance to this effect in relevant policies (to which purpose this wording is reinforced within the academy's Recruitment Policy).

7.16   Governing bodies should ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum. For example, this may include covering relevant issues through (in primary schools) Relationships Education and (in secondary schools) Relationships and Sex Education (formerly known as Sex and Relationship Education) and Health Education (in all state-funded schools) which was made compulsory in September 2020.

8.   Identifying concerns

8.1   Schools will promote their safeguarding aims by:
   - ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
   - empowering staff to share (with the DSL) any low-level safeguarding concerns (see below)
   - addressing unprofessional behaviour and supporting the individual to correct it at an early stage
   - handling and responding to such concerns sensitively and proportionately when they are raised
   - helping identify any weakness in the school or colleges safeguarding system.

8.2   There are various circumstances in which a staff member might be alerted to the increased possibility of abuse.

8.3   These include (but are by no means limited to) the following indicators – the child may:

- be showing early physical signs of abuse or neglect

- be privately fostered

- appear frightened of their parent(s)/carer(s) or other adults

- act in a way that is inappropriate to their age and development (although full account needs to be taken of different patterns of development and different ethnic groups)

- have one or more inexplicable absences from school

- show signs of being drawn in to anti-social or criminal behaviour, including gang involvement.

8.4   Although by no means conclusive, one or more of the above factors may indicate that the child is at greater risk of being abused and/or may be more likely to be vulnerable to modern slavery, trafficking, exploitation or radicalisation.

8.5   An additional factor of relevance may be the child's mental health, as such problems can, in some cases, be an indicator that a child has suffered or is at greater risk of suffering abuse, neglect or exploitation. Only trained professionals should attempt to make a diagnosis, but staff are well placed to observe children on a day-to-day basis and thus identify behaviour that might suggest a child is experiencing a mental health problem or is at risk of developing one, and should staff have any concerns of this nature they should notify the DSL who will decide on appropriate action.

8.6   The parent or carer of the child may:

- persistently avoid child health services and treatment of the child's illnesses

- have unrealistic expectations of the child

- frequently complain about or to the child and fail to provide attention or praise

- persistently refuse to allow access on home visits by professionals

- be involved in domestic violence and abuse

- be socially isolated

- be misusing substances.

8.7   Additional factors affecting the family unit may include a family member being in prison, and homelessness, both of which represent a meaningful risk to the welfare of children, and accordingly should be brought to the attention of the DSL.

8.8   Additionally, (in the case of an abusive relationship unrelated to the family unit) the school may be made aware by a parent/carer that they have significant concerns regarding the welfare of a child or young person.

8.9   Looked after children (LAC) (and, to a lesser extent, those who have previously been accorded LAC status) are potentially vulnerable and are statistically at higher risk of abuse.

All staff require to be aware of these facts and should be encouraged to maintain a proactive attitude towards children thus identified.

8.10   The academy recognises that the allocation of a social worker (to a child) represents an indicator that the child may be at more risk than most pupils, in that they are vulnerable to further harm and potentially may suffer from poor mental health.

8.11   Those children who have special educational needs and disabilities (SEND) can pose additional difficulties in the identification of safeguarding issues and concerns. Such children are three times more likely to be abused than their peers.

8.12   Relevant factors can include:

- the assumption (without further consideration or exploration) that indicators of possible abuse (such as behaviour and mood or even physical injury) are related to the child's disability

- the observation that children with special educational needs and disabilities can be affected to a disproportionate degree by issues such as bullying without necessarily showing any overt signs of this

- commensurate barriers to communication.

8.13   Accordingly, all schools and academies should ensure that their protocols and procedures acknowledge that additional barriers to recognition of abuse and neglect can exist in relation to this group of children and that close liaison between the school's DSL and SENCO will be required in dealing with any issues of abuse.

8.14   Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Accordingly, schools and academies should endeavour to reduce the additional barriers faced, and not only provide a safe space for them to speak out or share their concerns with members of staff but also should make this explicit.

8.15   Serious case reviews have found that where parental substance misuse, domestic abuse and mental health problems (sometimes referred to as the 'toxic trio') co-exist in a family this could represent a significant risk to children. Problems can also be compounded by poverty or by frequent house moves or eviction, and a holistic approach should be taken in considering the parameters of any individual case where safeguarding issues are a cause for concern.

9.   Low-level concerns

9.1   Examples of behaviour which could constitute low-level concerns include, but are not limited to, the following:

- being over friendly with children

- having favourites

- taking photographs of children on their mobile phone, contrary to school policy

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door

- humiliating pupils.

9.2 All low-level concerns will be shared initially with the DSL. All low-level concerns should be recorded in writing and held securely in accordance with their confidential and sensitive nature.

9.3 If the DSL is in any doubt as to whether information shared about a member of staff as a low-level concern in fact meets the harm threshold, the DSL should consult with the LADO to obtain further guidance.

9.4 The DSL will use their professional judgement in informing the headteacher of all low-level concerns in a timely fashion according to the nature of the concern.

10.   Acting on concerns (including low-level concerns)

10.1 It is not the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All members of staff do, however, have a duty to recognise concerns and maintain an open mind whilst bringing such matters to the attention of the DSL at the earliest opportunity.

10.2 All members of staff should be aware 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. This should not prevent staff from speaking to the DSL if they have concerns.

10.3 Accordingly, all concerns regarding the welfare of pupils should be recorded and discussed with the DSL prior to any discussion with parents or carers (and any concerns which are raised in relation to supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified).

10.4 The DSL will review records on a regular basis to identify any potential patterns of inappropriate, problematic or concerning behaviour, and will take appropriate action should any such issue be identified.

10.5 In relation to children requiring support with mental health issues, schools should approach external agencies and further information can be obtained from the government document 'Mental Health and Behaviour in Schools' (website mental-health-and-behaviour-in-schools)

10.6 If a child chooses to tell a member of staff about alleged abuse, there are several actions that staff should undertake to initially support the child:

- staff will actively listen with the utmost care to what the child is saying
- staff will stay calm and be available to listen
- the key facts will be established in language that the child is capable of understanding and the child's own words will be used in clarifying/expanding what has been said
- no promises will be made to the child (such as to 'keep secrets')
- staff will question normally without pressurising and only using open questions
- leading questions should be avoided
- questioning should not be extensive
- staff will not put words in the child's mouth but will note the main points carefully

- a full written record will be kept by the staff duly signed and dated, including the time the conversation with the child took place, an outline of what was said, comment on the child's body language etc (see Appendices 3 and 4 for further information on record keeping)

- it is not appropriate for staff to make children write statements about abuse that may have happened to them

- staff will reassure the child and let them know that they were right to inform them and will advise the child that this information will now have to be passed on.

10.7 Most crucially, the DSL (unless of course the disclosure has already been made directly to that individual) will be informed immediately by the member of staff concerned.

10.8 As well as ensuring their protection, the needs and wishes of the child should be paramount in any response, and as far as is practicable the child should be allowed to continue in their normal routine whilst being enabled to feel safe in the school environment. It is important that they feel in as much control of the process as is reasonably possible, and they should never be made to feel ashamed, or that they are the problem, for making (or being the subject of) a report of this nature.

10.9 Consideration should be given to the child being at potential risk of further abuse, and staff should also be aware that sexual assault can result in a range of health needs, including physical, mental and sexual health problems. Specialist help can be accessed from an NHS Sexual Assault Referral Centre (SARC), and other support, such as Children and Young People's Independent Sexual Violence Advisors, can be signposted by the police and local authority social care agencies.

11. Child absent from education

11.1 The above definition includes all children who are missing orthodox education (including those who are not on any school roll but may be being educated elsewhere) as well as those who are on the school roll but are not attending on a regular basis. Either of these instances can be viewed as representing potential vital warning signs of safeguarding risks to a child.

11.2 A child absent from (or missing) education is a potential indicator of abuse. Staff should be alert to signs and look for individual triggers which could imply the imminence of travel to conflict zones, FGM or forced marriage, or potential involvement in criminal (often drug-related) activity.

11.3 Staff should follow the academy's policy and procedures for children who go missing, particularly when this occurs repeatedly.

11.4 The academy must inform the local authority of any pupil who fails to attend school regularly, or who has been absent without permission for a continuous period of ten (school) days or more. The academy will also notify the local authority when a pupil is to be deleted (under the above circumstances) from its admission register.

12. Making a referral

12.1 Knowing what to look for is vital to the early identification of abuse, neglect, and radicalisation. Where staff or others need to raise concerns, these can be directed to the DSL who will coordinate a response. Concerns can be raised directly with local authority children's social care but contact with the DSL is advocated in the first instance.

12.2 The DSL will record concerns and report these, where indicated, to the relevant agencies. A referral involves giving children's social care, or the police, as much information as possible about concerns relating to an individual or family in order that enquiries can be undertaken by the appropriate agency, followed by any necessary action.

12.3 If there is concern at any point regarding an imminent risk of serious harm to a child a referral should be made to children's social care (and if appropriate the police) immediately. **Anybody can make a referral in these circumstances.**

12.4 A child protection conference will be convened by the local authority if a referral has been made and the subsequent investigation findings have confirmed the child to be at risk of harm.

12.5 Alternatively, where the child is already subject to a Child Protection Plan, a review conference may be held to monitor the safety of the child and take appropriate action to reduce the risk.

12.6 Staff may be required to attend child protection conferences or core group meetings as key professionals in working with the child and as a representative of the academy.

13. Consent

13.1 Professionals should seek to discuss any concerns with the family (including the child where appropriate) and where possible seek their agreement to making referrals to the Local Authority Assessment Team.

13.2 The parents' consent to make a referral is not required if it is considered that the child is in need of protection, and/or it is felt that to seek consent might be likely to place the child at an increased risk of significant harm. It should, however, be noted that parents will ultimately be made aware of which organisation initiated the referral.

13.3 Parents, carers, or the child who is involved may not agree to information being shared, but this should not prevent referrals where child protection concerns persist. The reasons for dispensing with obtaining consent from the parents, carer or child (when this is felt to be appropriate) should be clearly recorded and communicated to the relevant representative of the local authority.

14. Supporting staff

14.1 Safer recruitment processes will be followed in accordance with the academy's Recruitment Policy which incorporates guidance from KCSIE.

14.2 Staff will be given regular advice and guidance on the boundaries of appropriate behaviour. The policy document Code of Conduct and Practice should assist in limiting allegations and/or complaints against staff in relation to abuse of trust.

14.3 In the event of any complaint or allegation against a member of staff, the headteacher (or the DSL if the headteacher is not present) should be notified immediately. If the complaint or allegation relates to the headteacher, the Chair of Governors should additionally be informed without delay.

14.4 Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and should act to anticipate, manage and minimise the stress inherent in the process.

14.5 Accordingly, it is essential that any allegation of abuse made against a member of staff is dealt with not just speedily (although this is important) but also in a fair and consistent manner which provides effective protection for the child whilst, at the same time, supporting the individual who is the subject of the allegation.

14.6 The procedures for dealing with allegations should be applied with common sense and judgement. Some cases may not meet the criteria set out in the following clause and these may, where deemed appropriate, be addressed without instigating formal action.

15. Reporting concerns or allegations of abuse against staff (including volunteers)

15.1 If any member of staff or volunteer has concerns about the behaviour or conduct of another individual working within our establishment which include perceptions that the individual has:

- behaved in a way that has harmed a child, or may have harmed a child;

- possibly committed a criminal offence against or related to a child; or

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children

then the nature of the allegation or concern should be reported immediately to the headteacher.

15.2 It is important that the matter be dealt with by the headteacher without delay and in accordance with the procedures set out in the next section of this policy. In such instances, it is vital that no member of staff (other than the headteacher) to whom an allegation or concern has been reported should make any attempt to question the child or to investigate the matter further but should instead ensure that it is brought to the attention of the relevant person or agency as soon as possible.

16. Dealing with allegations of abuse made against staff (including volunteers)

16.1 In the event of the academy being made aware of any allegations of child abuse against a member of staff (whether initially reported internally or externally) advice should be sought directly (in line with KCSIE) from the DSL who may in turn contact the LADO and/or the police.

16.2 The LADO and/or the police may deem it necessary to arrange for a multi-agency strategy meeting to be held (or at the very least a discussion with, if applicable, the child's case manager) before an investigation is undertaken or disciplinary process (if indicated in relation to a member of staff) is initiated. The LADO's role is not to investigate the allegation, but to

ensure that an appropriate investigation is carried out, whether that is by the academy itself (in straightforward cases, this should normally be undertaken by a senior member of academy staff) or by police, local authority children's social care, or a combination of these.

16.3 Such a meeting (or discussion) will determine the precise nature, content and context of the allegation and the appropriate course of management. Sharing information in this way is vital to ensure that the correct action is taken.

16.4 Further investigation may be necessary, in which event the academy may (depending upon available resources) wish to appoint an external investigator to undertake this task.

16.5 If (in the event of an allegation being made against an individual) suspension of a member of staff is deemed appropriate, the staff member involved will be afforded support and will be provided with a named contact within the school. In all cases the matter should be dealt with as quickly as possible in accordance with disciplinary process.

16.6 When determining the outcome of investigations into such allegations the following definitions should be used:

- 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

- false – there is sufficient evidence to disprove the allegation

- unsubstantiated – there is insufficient evidence to either prove or disprove the allegation: the term therefore implies neither guilt nor innocence

- unfounded – to reflect cases where there is no evidence or proper basis which supports the allegation being made.

16.7 On completion of an investigation, schools and academies should always consider the facts and determine whether any lessons can be learned and improvements made, and this should be done irrespective of whether the allegation has been substantiated.

16.8 Further details relating to the handling of suspension and the management of allegations are outlined in the academy's Disciplinary Policy.

16.9 Any allegations made against an employee who is no longer employed by the academy should be referred directly to the police by the DSL or headteacher.

17. Informing parents/carers

17.1 Parents/carers of a child or children involved should be informed about an allegation if they are not already aware of it. However, where a strategy discussion is indicated, or children's services need to be involved, the parents/carers should not be contacted until those agencies have been consulted and have agreed what information it is acceptable to disclose.

17.2 The deliberations of a disciplinary hearing of any staff member against whom an allegation of abuse has been made, and the information taken into account in reaching a decision. should only be disclosed to the parents or carers of the child after careful consideration of:

- the Human Rights Act 1998 (relating to the duty of confidence)

- the Data Protection Act 2018
- the General Data Protection Regulation (GDPR).

17.3 It may, in certain circumstances, be appropriate to make parents and carers aware of the prohibition on reporting or publishing allegations about teachers under section 141F of the Education Act 2002. Reporting restrictions prevent the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school or college. These restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation.

18. Exit arrangements

18.1 If a member of staff who is the subject of safeguarding allegations resigns or ceases to provide their services, this will not prevent an allegation being followed up.

18.2 The Disciplinary Policy details guidance on referrals to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA) in relation to safeguarding issues where a member of staff is dismissed (or resigns before the completion of a disciplinary process).

18.3 A referral to DBS (and, in the case of a teacher, to TRA in addition) must be made if any individual has harmed, or poses a risk of harm to, a child or if there is reason to believe the staff member has committed the allegations presented and has been removed from working (whether paid or unpaid) in regulated activity (or would likely have been so removed had they not left). If the accused refuses to co-operate with an investigation and/or participate in any disciplinary proceedings, such process should continue until it reaches a conclusion.

18.4 In the event of a settlement agreement being proposed it is **not** appropriate to reach an agreement with any staff member which would prevent the school from making a referral to DBS and/or TRA where the criteria are met. This would result in a criminal offence being committed as the school would be failing to comply with its legal duty to make such referral.

19. Children staying with host families ('private fostering')

19.1 Under both the Children Act 1989 and the Safeguarding Vulnerable Groups Act 2006, where a child is provided with care and accommodation by a host family to which they are not related this arrangement could amount to 'private fostering' (as defined by the aforesaid legislation).

19.2 Where the child is under 18 years of age and the person providing the care and accommodation is paid to provide that arrangement, or the arrangement is not made by the child's family, the private fostering could amount to 'regulated activity' under the current legislation (regardless of the duration).

19.3 If the school is responsible for making the arrangement and has the power to terminate the arrangement, then the school could be regarded as a regulated activity provider. As a regulated activity provider must not knowingly allow a person to carry out a regulated activity whilst barred it is therefore appropriate that where the school is acting in this capacity it should request a DBS certificate with barred list check.

19.4 Where the school has not been involved in making the arrangement but a staff member or volunteer becomes aware that a pupil may be in a private fostering arrangement whereby a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, they should raise this in the first instance with the DSL for child protection. The school should notify the local authority of the circumstances and the local authority should check that the arrangement is suitable.

19.5 In relation to children staying with families overseas, DBS checks cannot access criminal records held overseas. In such circumstances the school will aim to work with partner schools abroad to ensure that similar assurances are undertaken prior to a visit and will, where necessary, contact the relevant foreign embassy or high commission of the country in question to establish if similar checks can be carried out in that country.

20. Elective home education

20.1 In line with the Education (Pupil Registration) (England) Regulations 2006 (as amended in 2016) schools must inform their local authority of all deletions from their admissions register when a child is taken off roll.

20.2 When a parent or carer has expressed their intention to remove a child from the establishment, and before a final decision is made regarding the removal from the school roll, key professionals should coordinate a meeting with the parents or carers to consider what is in the best interests of the child. This is particularly important where a child has SEND or is vulnerable and/or has a social worker.

21. Partnerships with others, including resources and support

21.1 The academy recognises that it is essential to establish positive and effective working relationships with other agencies such as the following: the local authority; police; health services (including CAMHS); Childline in Partnership with Schools; NSPCC; National Youth Advocacy Service; Surestart; Children's Fund etc.

21.2 The academy will cooperate with local authority social care as and when child protection enquiries are ongoing and will endeavour to be represented in appropriate multi-agency meetings and reviews and to provide written reports as required in such circumstances, and it is appreciated that attendance and contribution to these meetings and reviews may require key members of staff to be available to be contacted as necessary during school holidays.

21.3 To further support schools the Department for Education (DfE) has published advice and guidance on relevant topics which can be found online, as well as providing additional support including funding to support costs of a training programme for senior mental health leads who (although this role is not mandatory) it is expected, as set out in KCSIE, will be a member of, or supported by, the senior leadership team and could be the pastoral lead, SENCO, or designated safeguarding lead.

21.4 In addition, the DfE has set out relevant advice and guidance (September 2021) entitled 'Sexual violence and sexual harassment between children in schools and colleges' and Public Health England has produced a range of resources to support secondary schools to promote positive health, wellbeing and resilience among children.

21.5 Further to these resources, a full range of support contacts for victims can be found within Annex B of KCSIE.

22.   Other policies and procedures

22.1 This policy, together with the following, should be interpreted alongside and in conjunction with other policies regarding the safety and welfare of children, which may include, some or all of the following:

- Accessibility Plan
- Anti-Bullying Policy
- Attendance Policy
- Behaviour Policy
- Staff Code of Conduct
- Complaints Policy
- Disciplinary Policy
- Equality Policy
- E-safety Policy
- Grievance Policy
- Home School Agreement
- Recruitment Policy
- Social Media Policy
- Special Educational Needs Policy
- Whistleblowing Policy

Appendix 1: Roles and responsibilities

Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) for child protection is a member of the leadership team who has received (and continues to receive) regular updates on appropriate training and support for this role.

The DSL should ensure that they are aware of the circumstances in which pupils may have been allocated a social worker, and should also ensure that they promote educational outcomes by sharing (non-confidential) information about welfare, safeguarding and child protection issues with teachers and the school leadership team.

One or more additional members of staff may be appointed as Deputy DSL to provide further support to ensure that the responsibilities for child protection and safeguarding children are fully embedded within the school ethos and that specific duties are discharged. They will assist the DSL to discharge their duties and will act as cover in their absence. The training of a Deputy DSL will be to the same standards as the DSL and the role will be explicit in their job description.

The DSL will ensure there is a structured procedure within the school to be followed by all members of the school community in cases of suspected abuse.

Headteacher

The headteacher of the school will ensure that:

- the policies and procedures adopted by the governing body are fully implemented and are followed by all staff; and that all staff have read (as a minimum) part one (or, if not directly in contact with children, Annex A) of 'Keeping Children Safe in Education 2023' as part of their induction programme

- sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and inter-agency meetings, and contributing to the assessment of children

- all staff and volunteers feel able to raise concerns about poor or unsafe practice in relation to children, and that such concerns are addressed sensitively and effectively in a timely manner.

Governing Body

The governing body is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and that these are reflected in day to day safeguarding practices by establishing that the school has effective policies and procedures in place in accordance with this policy and by monitoring compliance with them.

Appendix 2: Records and monitoring

Any concerns about a child (including low-level concerns) will be recorded in writing as soon as possible. All records will provide a factual and evidence-based account and there will be accurate recording of any action taken. Records will be signed, dated and, when felt appropriate, annotated as witnessed. Any concerns should be both documented (following school protocol) and reported without delay to the appropriate safeguarding services, or to the child's social worker if already appointed. If a staff member has any doubt about the recording of information they should discuss their concerns with the designated safeguarding lead (or deputy).

Staff should, at all times, exercise extreme caution in regard to performing any sort of physical examination or assessment of a child or young person given the potential for misinterpretation by others. Similarly, at no time should any individual teacher/member of school staff take (or be asked to take) photographic evidence of any injuries or marks to a child's person (as this type of behaviour could lead to the staff member's actions being criticised as inappropriate).

Staff, particularly pastoral staff, will record any minor concerns on a Record of Concern form and will take responsibility for alerting the designated lead should the number of concerns rise or, in their professional judgement, become significant.

Safeguarding, child protection and welfare concerns will be recorded on CPOMs – it should be clear where there are concerns and where there have been referrals relating to a child. These electronic files will be available for external scrutiny by, for example, a regulatory agency or in the event of a serious case review or audit.

Why recording is important

All staff are encouraged to understand why it is important that recording is comprehensive and accurate. Records will be kept up to date and reviewed regularly by the Designated Safeguarding Lead (DSL) to evidence and support actions taken by staff in discharging their safeguarding responsibilities. Original notes will be retained (and clearly identified as such) as they represent a contemporaneous account. Such records may be important in any criminal proceedings arising from current or historical allegations of abuse or neglect.

Records (including those of low-level concerns) should be reviewed to highlight any potential patterns of concerning, problematic or inappropriate behaviour which can be identified and addressed.

The CPOMs file can be active or non-active in terms of monitoring (for instance if a child ceases to be a 'looked after child', or subject to a child protection plan) and the appropriate level of activity can be recorded. If future concerns arise it can be reactivated and indicated as such on the chronology as new information is added.

If the child moves to another school, the CPOMs records will be transferred, as part of the admission/transition arrangements, to the DSL at the new establishment/school. There will be a timely liaison between each school's DSL to ensure a smooth and safe transition for the child.

Recording practice

Timely, clear, comprehensive and accurate recording will take place when there are any issues regarding a child.

A record of each and every episode/incident/concern/activity relating to that child, including telephone calls to other professionals, needs to be maintained on a CPOMs chronology for that child. This will include any contact from other agencies who may wish to discuss concerns relating to a child. Actions will be agreed between parties and roles and responsibility of each agency will be clarified and outcomes recorded.

More detailed recording on the record of concern will be signed, dated and uploaded onto CPOMS, and may include an analysis, taking account of the holistic needs of the child, and any historical information held on the child's file. Support and advice will be sought from local authority social care as appropriate. In this way a picture will emerge which can be of assistance in promoting an evidence-based assessment and in determining any action that may need to be taken.

Such robust practice across child protection and in safeguarding and promoting the welfare of children will assist the school in the early identification of any concerns and may thus prevent future harm.

The DSL will have a systematic means of monitoring children known or thought to be at risk of harm (through CPOMs and through an ongoing dialogue with pastoral staff). They will ensure that staff contribute to assessments of need and will support multi-agency plans for those children.

Recording injuries

When staff notice an injury to a child, they should record the following information in respect of each mark identified (such as red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns):

- exact site of injury on the body (for instance upper outer arm, left cheek etc)
- size of injury - in appropriate centimetres or inches
- approximate shape of injury (for instance round, square or linear etc)
- colour of injury - if more than one colour, say so
- is the skin broken?
- is there any swelling at the site of the injury, or elsewhere?
- is there a scab/any blistering/any bleeding?
- is the injury clean or is there grit/fluff etc?
- is mobility restricted as a result of the injury?
- does the site of the injury feel hot?
- does the child feel hot?
- does the child feel pain?
- has the child's body shape changed/are they holding themselves differently?

It is essential that the date and time of the recording are stated as well as the name and designation of the person making the record. Any further (objective) comments may be added as required. Ensure appropriate first aid is provided where required (and that this is recorded).