

# Safeguarding policy



**Approved by:** The Trust Board

**Date:** 15 July 2024

**Last reviewed in:** June 2024

**Next review due by:** July 2025

**DOCUMENT CONTROL**

**Changes History**

Issue No	Date	Amended by	Summary of Changes
2	13 July 2022	Steve Watts	<p>Updated to reflect KCSiE 2022</p> <p>Sentences added about the need for schools to work together with parents and children to keep children safe</p> <p>Added that anyone employed to undertake teaching work will complete UK Feminista’s <a href="#">Tackling sexism in schools: Online teacher training</a> as part of their safeguarding induction</p>
3	5 July 2023	Jemma Lynch	<p>Updated to reflect KCSiE 2023. Sections updated:</p> <p>1 updates to bullet points 2 &amp;4</p> <p>4. Acknowledgement that children may not feel ready or able to disclose abuse / may not be aware of abuse</p> <p>5.1 Bullet point 2: addition of low-level concerns, allegations &amp; whistleblowing reflected in Staff Code Of Conduct</p> <p>5.5 Responsibilities of Local Governing Body</p> <p>7.12 Requirement for effective tracking and monitoring of mental health wellbeing</p> <p>11 NEW: reference to Trust Online Safety Policy  NEW: reference to Trust Online Safety self-assessment tool  NEW: Requirement for DSLs to be aware of filtering and monitoring within school  Importance of communicating new online ‘dangers’ to parents</p> <p>15. Removal of reference to NSPCC and approved Local Safeguarding Partnership providers. Replaced with reference to National College.  Reference to DSL induction pack and where induction packs should be held once completed.  Appendix C: Updates to role of DSL and training, knowledge and skills.</p>
3	25 June/2 July 2024	Jemma Lynch/Steve Watts	<p>Updated distribution list to remove Mary Pritchard and replace with Dave Gooderham.</p> <p>References to KCSiE (Keeping Children Safe in Education) have been updated to reflect the 2024 version.</p> <p>Included reference to the Academy Trust Governance Guide.</p> <p>Section 3 - Updated to reflect the new definition of safeguarding.</p> <p>Section 7.3 – link added to procedural information about the mandatory reporting of FGM</p> <p>Section 12 - Retitled to reflect the EYFS statutory framework.</p> <p>Appendix 2 - Added a bullet point referencing obtaining self-declarations from shortlisted candidates</p> <p>Appendix 3 - Alteration to the Trust DSL email address and names.</p> <p>Appendix 3 - Added contact details for Norfolk LADO.</p> <p>Appendix 4 – Updated the title and content of the section previously entitled, ‘Children missing from education’ to ‘Children who are absent from education.’</p> <p>Appendix 4 – Homelessness section updated to reference the Homelessness Reduction Act 2017</p>

			<p><b>Appendix 4 – more detail about full and free consent added to the section on Forced marriage, and referenced the February 2023 law change about the age at which someone can marry</b></p> <p><b>Appendix 4 – updated the definition of radicalisation in the Preventing radicalisation section</b></p> <p><b>Annex C – added that the DSL's responsibilities include understanding the filtering and monitoring systems and processes in place</b></p> <p><b>Annex C – extended the final bullet point to include recording the rationale for making decisions</b></p>
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**Authorisation (Responsible Owner)**

<b>Name</b>	<b>Role</b>	<b>Approval Date</b>
Jemma Lynch	Trust Safeguarding Lead	June 2024

**Approval (Accountable Owner)**

<b>Name</b>	<b>Role</b>	<b>Approval Date</b>
Ian Jacobs	Named Trustee for Safeguarding	July 2024

**Distribution List – Once authorised (Informed)**

<b>Name</b>	
Headteachers	
DSLs	
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**Review Period (at least annually or whenever statutory guidance changes)**

<b>Date Document Reviewed</b>	<b>By Whom</b>
June 2023	Jemma Lynch, Trust Safeguarding Lead
June 2024 (next review due Summer 2025)	Jemma Lynch, Trust Safeguarding Lead

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## 1. Safeguarding statement and aims

The trust believes in supporting all aspects of children and young people's development and learning and keeping children safe. This is best achieved when parents/carers, children and schools work together. Parents/carers are key to children and young people becoming and remaining resilient. We understand that emotional and social aspects of learning create a foundation for all academic learning. If a child has not been supported to understand, express and resolve their feelings, they may not have the ability to share with other children, resolve the small conflicts that arise in day-to-day classroom life, or concentrate on learning. Their frustrations may cause a range of antisocial, disruptive, overly compliant or withdrawn behaviours. All staff who work at the trust will ensure that:

- Children and young people are listened to, valued and respected
- Staff are aware of indicators of abuse, neglect and exploitation and know how to share their concerns appropriately
- All paid and unpaid staff are subject to rigorous recruitment procedures
- All paid and unpaid staff are given appropriate support and training

Education staff play a crucial role in helping to identify welfare concerns, and indicators of possible abuse, neglect or exploitation, at an early stage. The trust is committed to referring those concerns via the Designated Safeguarding Lead (DSL) to the appropriate local authority children's social care, contributing to the assessment of a child's needs and, where appropriate, to ongoing action to meet those needs.

To ensure children are adequately protected the trust will ensure that:

- All DSLs, Deputy/Alternate DSLs, named safeguarding governors and named governors for children in care attend specialised training appropriate for their positions, which will be updated at least every two years.
- All new staff, teaching and support, paid and volunteers, will receive up to date safeguarding training. A log of staff safeguarding training is kept by the DSL. On their first day, as part of their induction, all new staff will receive a copy of this policy and the trust's staff and persons in a position of trust code of conduct, their school's child protection procedures, behaviour policy, and induction pack. In addition, staff who work directly with children must read at least Part one and Annex B of Keeping Children Safe in Education (KCSiE). Staff who do not work directly with children must read Annex A (a condensed version of Part one). Anyone employed to carry out teaching work will also complete UK Feminista's [Tackling sexism in schools: Online teacher training](#). The new staff member and the DSL will sign to evidence that the induction has been completed. The trust will ensure that mechanisms are

in place to assist staff to understand and discharge their role and responsibilities as set out in Part one (or Annex A if appropriate) of Keeping Children Safe in Education (September 2024). Whenever this policy is reviewed and updated the trust will ensure that all staff receive a copy; each school will retain evidence to confirm that all staff have read and understood the current version. The DSL provides staff with regular updates, which may be via email as well as during staff meetings, PD days and through safeguarding displays. In addition, all staff must complete [Prevent awareness e-learning](#), which should be refreshed at least every three years or whenever the Home Office's e-learning course is updated. Copies of Prevent training certificates, or other evidence of completion, are kept by the DSL. All members of staff will be advised to ensure that their behaviour or actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This is also highlighted in the staff code of conduct; this policy is also applicable to others in a position of trust working within school.

- All children, young people and their families have access to their school's child protection procedures via the school's website
- The trust safeguarding policy is reviewed on an annual basis by the trust. Schools will also review their individual school's child protection procedures on an annual basis.
- Where school premises are used for non-school activities, safeguarding requirements are included in lease/hire agreements, as a condition of use/occupation of the premises, and that failure to comply will lead to termination of the agreement

The trust aims to ensure that:

- Our schools take a whole school approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at heart
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare, as soon as problems emerge
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- Where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide
- Well promoted, easily understood and easily accessible systems are in place for children to confidently report abuse, neglect and exploitation knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- Pupils are taught about safeguarding, including online safety. This may include covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which became compulsory from September 2020. The following resources may help:
- The Department for Education's non-statutory guidance: [Teaching online safety in schools](#).
- Annex D of the Department for Education's statutory guidance, Keeping Children Safe in Education (September 2024) includes additional information to support schools and parents/carers to keep children safe online.
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#)
- UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- The UKCIS guidance on [using external visitors](#) helps schools to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: [Thinkuknow](#)
- Public Health England: [Every Mind Matters](#)
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
- London Grid for Learning's '[Undressed](#)' provides advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

- Appropriate filters and monitoring systems are in place

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education \(September 2024\)](#) and [Working Together to Safeguard Children 2023](#), and the [Academy Trust Governance Guide](#). We comply with this guidance and the procedures set out by our local safeguarding partners.

This policy is also based on the following legislation, guidance and advice:

- Part 3 of the schedule to the [Education \(Independent Trust Standards\) Regulations 2014](#), which places a duty on academies to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Multi-agency statutory guidance on female genital mutilation](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteachers should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our schools to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#)
- [What to do if you're worried a child is being abused](#)
- [Guidance for safer working practice](#)
- [Sharing nudes and semi-nudes](#)

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

This policy also complies with our funding agreement and articles of association.

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- 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

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

**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.

**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.

**Children** includes everyone under the age of 18.

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse, neglect or exploitation 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.

**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. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We also recognise that children may not feel ready or know how to tell someone they are being abused. 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.

We give special consideration to children who:

- Have special educational needs or disabilities (see section 9)
- 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

### 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the trust and is consistent with the procedures of the local safeguarding partners where we have schools. Our policy and procedures also apply to extended school and off-site activities.

We contribute to multi-agency working in line with statutory guidance Working together to safeguard children. We work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. We allow access for children's social care from the host local authority and,

where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, statutory assessments.

### **5.1 The trust**

In addition to this policy, the trust will:

- monitor the effectiveness of safeguarding through annual safeguarding reviews in every trust school and have at least one of these externally reviewed each year
- provide a staff and persons in a position of trust code of conduct, which includes reporting of low-level concerns, allegations against staff and whistleblowing
- provide a whistleblowing policy
- provide recruitment and selection policy and guidance to ensure safer recruitment
- provide every DSL with an annual safeguarding/child protection update (prior to the autumn term), reflecting changes in statutory requirements and current issues
- keep a log of all referrals made to the local authority designated officer (LADO) by trust schools
- liaise with local authority lead professionals for safeguarding, the local safeguarding partners, Ofsted, the ESFA and other agencies as required

### **5.2 All staff**

All staff will sign to confirm they have read and understood Part one (or Annex A if appropriate) of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education \(September 2024\)](#), and review this guidance at least annually. They will also sign to confirm they have read and understood their school's current child protection procedures.

All staff will be aware of:

- Our systems which support safeguarding, including the staff and persons in a position of trust code of conduct, their school's child protection procedures and the role of the designated safeguarding lead (DSL)
- The early help 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, neglected or exploited 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, neglect and exploitation as well as specific safeguarding issues, such as child sexual exploitation (CSE), children missing from education, child criminal exploitation (CCE), FGM, radicalisation and child on child abuse

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

### **5.3 The designated safeguarding lead (DSL)**

All our schools have a named DSL whose details are in the school's child protection procedures. The DSL is a senior member of staff with the authority to take lead responsibility for child protection and wider safeguarding. Annex C provides a job description for the DSL.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL is absent, named deputies will act as cover. Their details are in the school's child protection procedures.

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
- Ensure that cover is provided for the role when they are absent from the school
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- 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



- Cooperate with any requests for information from the local authority, such as training returns or annual safeguarding self-reviews, in compliance with Section 11 of the Children Act 2004
- Ensure that staff, volunteers (including governors), pupils and their parents are aware of the school's child protection procedures
- Ensure that all staff receive appropriate safeguarding/child protection training and maintain training records
- Ensure that pupils' child protection records are transferred securely and separately from the main pupil file whenever pupils transfer to a new school. In addition to the child protection file, consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL, and named deputy DSLs, are set out in their job descriptions (see annex C, below).

#### **5.4 The designated teacher**

All our schools have a designated teacher whose details are in the school's child protection procedures. They must have appropriate training and the relevant skills and experience to work with local authorities to promote the educational achievement of registered pupils who are looked after. Under section 6 of the Children and Social Work Act 2017, they will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

A previously looked after child remains potentially vulnerable and all staff should have the skills, knowledge and understanding to keep them safe.

#### **5.5 The local governing body**

The local governing body will hold the headteacher to account for the implementation of this policy and the implementation of the school's child protection procedures.

The relevant trust director of education will act as the 'case manager' if an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

The local governing body will appoint a named safeguarding governor to monitor the effectiveness of this policy. This is always a different person from the DSL. In discharging their duties, they will undertake termly safeguarding reviews in their school and their report will be shared with the local governing body and the Trust Safeguarding Lead.

The local governing body are responsible for providing constructive challenge to the headteacher, DSL and named safeguarding governor. Local governing bodies should also ensure that all governors receive appropriate safeguarding and child protection training (including online safety) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at school are effective and support the delivery of a robust whole school approach to safeguarding.

#### **5.6 The headteacher**

The headteacher is responsible for the implementation of this policy and the implementation of the school's child protection procedures, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of the school's child protection procedures as part of their induction
- Communicating the school's child protection procedures to parents when their child joins the school and via the school 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 and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff, including supply staff, volunteers and contractors, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable

- Making sure each child in the Early Years Foundation Stage is assigned a key person

## 6. Confidentiality

- 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 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
- Under Schedule 3, Part 4, Paragraph 19 of the DPA 2018 schools are exempt from providing pupils' personal data where the serious harm test is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met. Where in doubt we may seek independent legal advice.
- Staff should never promise a child that they will not tell anyone about a report of abuse, neglect or exploitation as this may not be in the child's best interests
- 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 designated safeguarding lead (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. Recognising abuse, neglect and exploitation and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Staff must also recognise that children may not feel ready or know how to tell someone they are being abused, neglected or exploited.

### 7.1 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.** The NPCC's [When to call the police](#) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

Tell the DSL (see section 5.2) immediately if you make a referral directly.

Local procedures for making a referral, as agreed with the local safeguarding partners, are set out in each school's child protection procedures.

The following link to the GOV.UK webpage for reporting child abuse to your local council, allows you to enter your postcode and provides contact details for your local authority:

<https://www.gov.uk/report-child-abuse-to-local-council>

### 7.2 If a child makes a disclosure to you

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
- Reassure them that they are being taken seriously and that they will be supported and kept safe. Never give the impression that they are creating a problem by reporting abuse, neglect, exploitation, sexual violence or sexual harassment. Children and young people should never be made to feel ashamed for making a report.

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Record your conversation in CPOMS as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. If you do not have access to CPOMS, the school's child protection procedures will say what you need to do.
- If a referral to children's social care and/or the police is required, this will usually be made by the DSL. If, in an exceptional circumstance where a child is in immediate danger, you make a referral to children's social care and/or the police directly (see 7.1), tell the DSL immediately that you have done so

### 7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education (September 2024) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

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'.

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.

All staff should speak to the DSL and follow local safeguarding procedures with regard to any concerns about FGM. There is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

The duty 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.

### 7.4 If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, neglected or exploited, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or be being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below). Sources of advice before making a referral to the local authority are in each school's child protection procedures.

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

#### Early help

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate. Local safeguarding partners should publish a threshold document which

includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document.

The DSL will keep the case under constant review and 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.

### **Referral**

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.

If you make a referral directly (see section 7.1), you must tell the DSL immediately.

The DSL may seek external advice before making a referral (each school's child protection procedures include details of local sources of advice). However, this should not delay the referral. The DSL makes the referral according to the locally agreed timescales and procedures (details are in each school's child protection procedures). The referral will note all previous intervention by the school with the child, any relevant history relating to the child, their siblings or the family. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The DSL shares information with other relevant professionals, recording reasons for sharing information and ensuring that they are aware of what action the other professionals will take as a result of information shared. The DSL informs parents that they have made a referral, if the parent does not already know, and if there is no reason not to let them know. The local authority may suggest delaying informing the parent in cases of suspected physical or sexual abuse, or where informing the parent might put the child at further risk, to prevent the child being harmed or intimidated (and retracting their disclosure) or in cases of suspected Fabricated or Induced Illness.

The DSL remains in close communication with other professionals around the child/family, in order to share any updates. If a child protection investigation is pursued, the DSL and other key school staff will:

- Work closely and collaboratively with all professionals involved in the investigation, to keep the child safe
- Attend a child protection conference when invited and provide updated information about the child
- Attend any subsequent child protection review conferences.
- Attend core group meetings and take an active role in the implementation of the protection plan

The local authority will make a decision within one 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.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

## **7.5 If you have concerns about extremism**

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

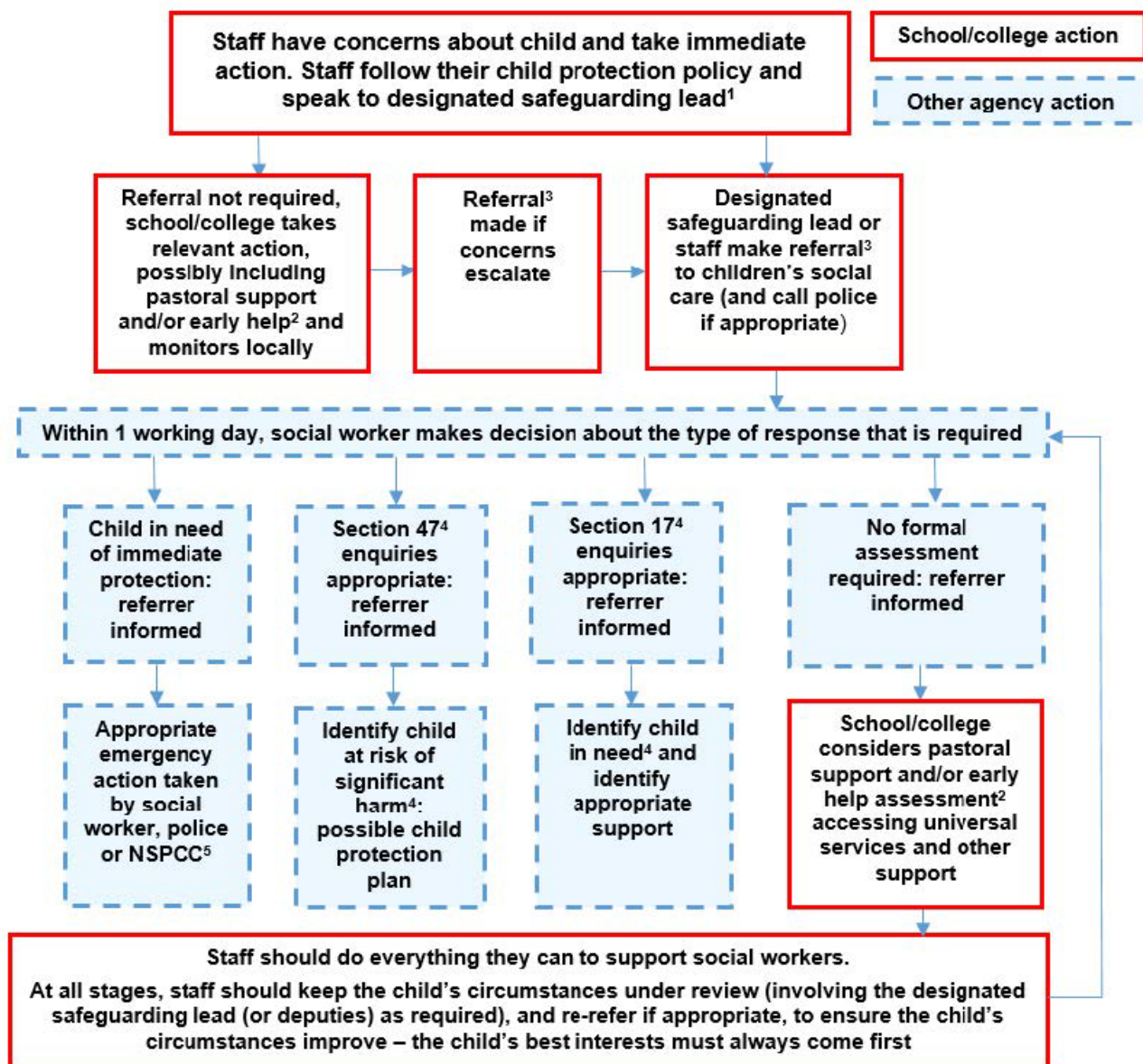
Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that 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](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

**Figure 1: actions where there are concerns about a child**



- (1) In cases which also involve a concern or an allegation of abuse against a staff member, see appendix 3
- (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process
- (3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. See chapter one of [Working together to safeguard children](#)
- (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in chapter one of [Working together to safeguard children](#)
- (5) This could include applying for an Emergency Protection Order (EPO)

## 7.6 Concerns about a staff member, including supply staff, volunteers and contractors

If you have concerns about a member of staff, including supply staff, volunteers and contractors at a school, speak to the headteacher. If you have concerns about the headteacher (or a relative of the headteacher working at the school), speak to the relevant trust director of education. Details of the headteacher and director of education will be in the school's child protection procedures.

The headteacher/director of education will then follow the procedures set out in appendix 3.

Where appropriate, schools with Early Years provision will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

If you have concerns about a member of the trust's central team, speak to the chief executive officer. If you have concerns about the chief executive officer, speak to the chair of the board of trustees. They will then follow the procedures set out in appendix 3.

## 7.7 Child on child abuse, including sexual violence and sexual harassment

All staff should be aware that children can abuse other children (often referred to as child on child abuse) and that it can happen both inside and outside of school, and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying) (see the DfE (Department for Education) guidance for schools on [preventing and responding to bullying](#));
- Abuse in intimate personal relationships between peers;
- 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) (see appendix 4 and [Part five of KCSiE](#));
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse (see appendix 4 and [Part five of KCSiE](#));
- 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 (not necessarily a skirt) without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim; and
- 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).

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. We will respond to all reports or concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school premises or online.

Some groups are potentially more at risk of child on child abuse. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Even if there are no reports of child on child abuse in a school, it does not mean it is not happening, it may be the case that it is just not being reported. If staff have any concerns regarding child on child abuse they should speak to the DSL.

Schools' behaviour policies will be clear about their zero-tolerance approach to sexual harassment and online sexual abuse, including sanctions when appropriate.

If a pupil makes an allegation of abuse against another pupil (see also section 7.2 above, entitled, 'If a child makes a disclosure to you'):

- You must tell the DSL immediately and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team, as appropriate, and follow its advice, as well as the police if the allegation involves a potential criminal offence
- Whenever sexual violence has occurred or is disclosed the DSL will ensure that both the "victim(s)" and the "perpetrator(s)" are formally referred to children's social care. This will be in addition to reporting the matter to the police. Sexual violence includes rape, assault by penetration and sexual assault. Children under 10 are below the age of criminal responsibility. Therefore, if they engage in

child on child abuse it is referred to as harmful sexualised behaviour rather than sexual assault. However, this should not deter schools from taking it seriously and formally referring both the “victim(s)” and the “perpetrator(s)” to children’s social care.

- The DSL will refer to the trust’s Harmful Sexual Behaviour guidance and record a risk assessment and risk management (support and protection) plan for all children involved – the victim(s), the child(ren) against whom the allegation has been made and any other child affected – with a named adult they can talk to if needed (the choice of any such adult should be the child’s). Schools should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school.
- The DSL will consider any intra familial harms and any necessary support for siblings following incidents
- The DSL will make referrals to sources of support as appropriate (see [Part five of Keeping children safe in education](#) (September 2024) for examples)
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child’s own behaviour might indicate that something is wrong. If staff have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told.

We will minimise the risk of child on child abuse by:

- challenging inappropriate behaviours, including any form of derogatory or sexualised language;
- making clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and are not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- 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;
- ensuring our schools’ Relationships Education, Relationships and Sex Education (RSE) and Health Education curricula are based on the [DfE statutory guidance](#) and that the staff delivering them receive sufficient training to enable them to feel confident delivering them. The DfE has produced a one-stop page for teachers: [Teaching about relationships, sex and health](#);
- ensuring systems are in place – which are well promoted, easily understood and easily accessible – for children to confidently report abuse, knowing their concerns will be treated seriously;
- recording all incidents of child on child abuse, including sexual violence and sexual harassment; and
- ensuring staff are trained to understand 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

### **7.8 The use of ‘reasonable force’**

There are circumstances where it is appropriate for staff in schools to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed.’ The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom.

### **7.9 Contextual safeguarding**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially

the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

### **7.10 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or 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. CSE and CCE can affect both male and female children and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. More information including definitions and indicators are included in [Annex B of Keeping Children Safe in Education](#) (September 2024).

Children can become trapped by criminal exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Professionals should be aware that girls (as well as boys) are at risk of criminal exploitation. Both boys and girls at risk of criminal exploitation may be at higher risk of sexual exploitation.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

### **7.11 Serious violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see section 7.10, above).

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

Violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#). The [Youth Endowment Fund \(YEF\) Toolkit](#) sets out the evidence for what works in preventing young people from becoming involved in violence.

The DSL will ensure that formal referrals are made to children's social care for any pupils about whom there are CCE concerns or who are at risk from or involved with serious violent crime.

### **7.12 Mental health**

Schools have an important role to play in supporting the mental health and wellbeing of their pupils. All staff should be aware 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. Schools should have effective processes in place to track and monitor pupil wellbeing and the impact of any interventions.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.



Where children have suffered abuse, neglect or exploitation, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the school's child protection procedures and speaking to the designated safeguarding lead or a deputy.

Schools can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools](#) guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Every Mind Matters](#) for links to all materials and lesson plans.

### **7.13 Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **7.14 Elective Home Education (EHE)**

If a parent/carer expresses their intention to remove a child from school with a view to educating them at home, our schools will work together with the local authority and other key professionals to coordinate a meeting with the parent/carer where possible. Ideally, this will be before a final decision has been made, to ensure the parent/carer has considered what is in the best interests of the child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

Whether or not it proves possible to arrange such a meeting, the headteacher will write to the parent/carer making clear the school's preference to retain children in school.

## **8. Notifying parents**

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

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## **9. Pupils with special educational needs and disabilities**

We recognise that pupils with special educational needs and disabilities (SEND) 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 disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

## 10. Children who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm.

However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavor to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

## 11. Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our schools will adopt whole school approaches to online safety to protect and educate pupils, students and staff in their use of technology and establish mechanisms to identify, intervene and escalate concerns as appropriate. Online safety will be considered when planning the curriculum (see section 1, above) and teacher training.

Staff will reinforce the importance of online safety when communicating with parents/carers. 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). Communication with parents / carers should also be used to reinforce the importance of children being safe online and parents / carers are likely to find it helpful to understand what systems schools use to filter and monitor online use. It is also helpful to communicate with parents/carers any new apps etc that children may access to enable them to continue supporting their child in staying safe online at home.

Each school's approach to online safety will be reflected in its child protection procedures which may refer to a separate online safety policy or the trust's Online Safety Policy. Schools' approaches will reflect the four areas of risk, categorised in KCSiE:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny/misandry, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: 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; for example, 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.

DSLs will have a good understanding of the filtering and monitoring processes in place. The trust use Smoothwall for filtering and monitoring all online activity. DSLs will ensure that Smoothwall is on all devices within school and any devices that are sent home with children.

Schools will carry out an annual review of their approach to online safety using the Trust's online safety self-review toolkit.

Schools will carefully consider the risks associated with mobile and smart technology and set out clearly how these will be managed on their premises.

Remote learning is covered in the trust's acceptable use of ICT policy.

## 12. Electronic devices with imaging and sharing capabilities

Staff will not use personal electronic devices with imaging and sharing capabilities, e.g. mobile phones and laptops/tablets, or school equipment for personal use, in front of pupils, except in case of emergency.

Whenever possible, images of pupils will be recorded on equipment provided by the trust (e.g. a school camera or iPad). However, if, in exceptional circumstances, personal equipment is used to record these images, staff will be mindful that they must be able to justify images of pupils in their possession. Staff will take care when recording images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the trust into disrepute. Staff will delete such images, from both the device

and any cloud storage, as soon as they have been downloaded to the school's network. Any personal devices used must not be set to automatically upload images to any shared platforms, e.g. Family Sharing. Images of pupils must be downloaded from designated school devices as soon as possible and the images deleted from the device.

We will follow the Data Protection Act 2018 when taking and storing photos and recordings for use in the trust. Please also refer to the trust's combined data protection and freedom of information policy.

## **13. Complaints and concerns about safeguarding practices**

### **13.1 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 (see appendix 3).

### **13.2 Other complaints**

Please refer to our complaints policy.

### **13.3 Whistleblowing**

Please refer to our whistleblowing policy.

## **14. Record-keeping**

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential, stored securely and only available to those who have a right or professional need to see it. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- A clear and comprehensive summary of the concern;
- Details of how the concern was followed up and resolved, and
- A note of any action taken, decisions reached and the outcome

If in any doubt about recording requirements, staff should discuss it with the DSL and / or the Trust Safeguarding Lead.

Where children leave the school (including in-year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within five days for an in-year transfer or within the first five days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

If the name of the receiving institution is not known, the DSL will notify the child's social worker as a matter of urgency as soon as the child leaves or appears to be missing. In these circumstances, the child protection records will remain at the school until the child is known to have registered elsewhere. In addition, the school will follow the local authority's procedure for Children Missing from Education (CME).

If a child leaves one of our schools to be electively home educated (EHE), their child protection records will remain at the school until the child is known to have registered elsewhere. If a child joins one of our schools following a period of EHE, the DSL will contact the DSL at their last known school to establish whether there are any child protection records and request that they be sent to the new school without delay. CPOMS will alert the new school if any previous record exists. However, the previous school has to release the record. When a child joins one of our schools and records from the previous institution indicate they have a child protection plan, the DSL will notify the local authority children's social care service immediately.

When a child who is known to have child protection records joins one of our schools and no child protection records have been received from the previous school, the DSL will contact the DSL at that institution to request the records be sent immediately. This request will be confirmed in writing and repeated if necessary. If they remain unavailable, the school will inform the Education Welfare Service.

In addition:

- Please refer to our records retention policy
- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 15. Training

The trusts safeguarding/child protection training framework is set out in the following table:

<b>Recruitment:</b>  <b>New staff/ volunteers/supply</b>	<b>Induction:</b>  <b>New staff/volunteers/supply/governors</b>	<b>Contractors</b>	<b>Safeguarding/child protection training for existing staff/volunteers</b>	<b>Governors</b>	<b>DSLs and deputies/alternates</b>
<p>As part of recruitment all staff and volunteers MUST have safeguarding/child protection training.</p> <p>This MUST be completed before their start date.</p> <p>Accepted training:</p> <p>National College safeguarding training for staff in schools [within the last academic year]</p> <p>Staff/volunteers must submit their certificate as evidence of completed training. These details will be recorded by the school or centrally for trust staff.</p> <p>Staff and volunteers cannot start until they</p>	<p>Safeguarding induction packs containing:</p> <ul style="list-style-type: none"> <li>• KCSIE (September 2024) Part one and Annex B for staff who work directly with children or Annex A only for staff who do not work directly with children [and Part two for SLT and governors]</li> <li>• Code of conduct</li> <li>• Child protection procedures</li> <li>• Behaviour policy</li> <li>• Safeguarding policy</li> </ul> <p>will be provided to all new staff and volunteers on their first day.</p> <p>The DSL will explain the child protection procedures within the school and Part one (or Annex A if appropriate) of Keeping Children Safe in Education (September 2024).</p> <p>Anyone employed to carry out teaching work will also complete UK Feminista's</p>	<p>Contractors arriving in school will all receive the school's child protection procedures.</p> <p>This will be signed for by the individual contractor.</p> <p>Before commissioning contractors, written confirmation must be received confirming all relevant checks have been fully completed (the trust has templates to assist contractors with this), with dates, and the</p>	<p>Staff <b>MUST</b> have safeguarding/child protection training, which includes online safety, at least every three years.</p> <p>Acceptable safeguarding/child protection training:</p> <p>National College or CPD accredited training with agreement from the Trust Safeguarding Lead.</p> <p>The trust will monitor all staff have been trained on a three-year cycle from their start date.</p> <p>All staff must also complete Prevent awareness e-learning, which should be refreshed at least every three years or whenever the Home Office's e-learning course is updated</p> <p>In addition, before the end of the summer term, the trust will provide each DSL with annual safeguarding/child protection updates in preparation for the</p>	<p>As part of their induction, all governors <b>must</b> watch the trust's safeguarding induction video for governors. In addition, all governors <b>must</b> access safeguarding/child protection training, that includes online safety, specifically for governors, within the first year of their term of office and every three years after that. A record of this must be kept within the school. This will be monitored by the trust.</p>	<p>On taking up the role, DSLs and deputies/alternates will be provided with the trust's DSL &amp; ADSL induction pack.</p> <p>DSLs and deputies/alternates will complete DSL training every two years, via National College or another provider in agreement with the Trust Safeguarding Lead</p> <p>DSLs within Suffolk may attend annual training for trainers, should they wish to deliver Schools' Choice training to staff.</p> <p>All DSLs and deputies/alternates will keep themselves up to date with</p>

<p>can evidence they have completed safeguarding/child protection training.</p>	<p><a href="#">Tackling sexism in schools: Online teacher training.</a></p> <p>Schools will record the induction has been completed and signed off by the DSL and new staff/volunteer. A copy of which will be held within the staff file</p>	<p>company must provide its safeguarding policy (where applicable).</p> <p>This will be held on file at the school and recorded on the SCR. Details of individuals will be provided by the company and these will be checked on arrival against the information provided.</p>	<p>September PD days. The updates will reflect changes within statutory requirements, locally agreed protocols and current issues.</p> <p>DSLs <b>MUST</b> deliver the updates to all staff/volunteers at their school and keep a register of who attended within the school. The trust will monitor this through schools annual Safeguarding and Welfare Reviews.</p> <p>DSLs will provide opportunities for discussion and in-house safeguarding training within their school. A record of all training/updates and meetings must be kept. The trust will monitor through schools annual Safeguarding and Welfare Reviews.</p>	<p>Trust employees who sit on local governing bodies are not required to undertake further safeguarding training in addition to that received in their work role.</p> <p>It is good practice for governors to complete the Home Office's <a href="#">Prevent awareness e-learning.</a></p> <p>Named governors for safeguarding and named governors for children in care should complete training specific to the role at least every two years.</p>	<p>emerging safeguarding issues.</p> <p>Evidence of this will be monitored by the trust through schools annual Safeguarding and Welfare Reviews.</p>
<p><b>Quality assurance and monitoring by the trust.</b></p> <ul style="list-style-type: none"> <li>Safeguarding/child protection training will be included as part of the recruitment and selection process.</li> <li>Annual safeguarding/child protection updates will be provided to all DSLs – details of the update will be recorded centrally.</li> </ul> <p>Annual quality assurance processes will include checks that:</p> <ul style="list-style-type: none"> <li>New staff have completed safeguarding/child protection training</li> <li>Induction packs have been issued and receipted for all new appointments</li> <li>DSL training is in line with current guidelines, including evidence of updates</li> <li>Governors are trained and kept up to date</li> </ul>			<p><b>Quality assurance and monitoring by the school.</b></p> <ul style="list-style-type: none"> <li>Record all new staff on the Single Central Record and check that a safeguarding/child protection training certificate has been provided</li> <li>Record that all new staff have signed to accept the induction information</li> <li>Keep a record of all those who attended the annual safeguarding/child protection update – with evidence of how the information was disseminated to those who could not access the update.</li> <li>Record details of all internal safeguarding/child protection updates, safeguarding/child protection discussions in team meetings and</li> </ul>		

- Every interview panel, where possible, should consist of three people, at least one person must have completed safer recruitment training within the last three years

inhouse training. These records will be sampled as part of the trust's quality assurance

- Produce termly safeguarding reports for the local governing body, including details of safeguarding/child protection training

## **16. Monitoring arrangements**

This policy will be reviewed **annually** by the Trust Safeguarding Lead. At every review, it will be approved by the Board.

## **17. Links with other policies**

This policy links to the following trust policies, procedures and guidelines:

- Safer recruitment and selection
- Staff and person in a position of trust code of conduct
- Complaints
- Whistleblowing
- Data Protection and Freedom of Information
- Health and safety
- Acceptable use of ICT
- Harmful sexual behaviour
- Online Safety

It also links to the following school policies and procedures:

- Child protection
- Behaviour
- Attendance
- Relationships Education (primary)/Relationships and Sex Education (secondary)
- Health Education
- First aid
- Curriculum
- Supporting pupils with medical conditions
- Special educational needs and disabilities
- Educational visits



These appendices are based on the Department for Education's statutory guidance, **Keeping Children Safe in Education (September 2024)**.

## Appendix 1: types of abuse

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.

**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 cyberbullying), 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.

[The Centre of Expertise on Child Sexual Abuse](#) has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

**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.

## Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in a single central record (SCR). Schools maintain an SCR of their staff and the trust maintains an SCR of central staff. Copies of the checks/evidence provided, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks/the evidence provided, as set out below.

### Appointing new staff

When appointing new staff, we will:

- Verify their identity. It is important to ensure the person is who they claim to be, this includes being aware of the potential for individuals to change their name. Best practice is to check the name on their birth certificate, where it is available.
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below).
- 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 two years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to undertake teaching work
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK.
- 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
- Require a full, written employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
- Require shortlisted candidates to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children
- Seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. References should always be obtained from the candidate's current employer. Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving should be obtained from the organisation at which they were employed. If a candidate is not currently working with children but has done so previously, secure a reference from the relevant employer from the last time they worked with children. References should be completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of disciplinary investigations).
- Ensure that appropriate checks are carried out to ensure that relevant individuals are not disqualified under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and Childcare Act 2006.
- Carry out an online search as part of our due diligence on shortlisted candidates (see our recruitment and selection policy and guidance for more details). This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- 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

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If 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 a trust school has had the appropriate level of DBS check. 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.

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.

#### **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.

In both cases, this includes checks to ensure that relevant individuals are not disqualified under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) Regulations 2018 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 working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Record a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that relevant individuals are not disqualified under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and Childcare Act 2006.

#### **Governors**

All trustees and local governors 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.

The chair of the board of trustees will have their DBS check countersigned by the secretary of state.

All trustees and local governors will have the following checks:

- Section 128 direction
- Other checks deemed necessary if they have lived or worked outside the UK

### **Alternative Provision**

Where a trust school places a pupil with an alternative provider, the school continues to be responsible for the safeguarding of that pupil, and will satisfy itself that the provider meets the needs of the pupil. The school should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform in respect of our own staff.

### **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 (homestay)**

Where a trust school 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.

Pupils should understand who to contact during a homestay should an emergency occur or a situation arise which makes them feel uncomfortable.

Where a period of UK homestay lasts 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to private fostering (see below).

Where a trust school 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.

### **Private fostering**

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative, in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. School staff should notify the DSL as soon as they become aware of private fostering arrangements. The school will then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. A link to comprehensive guidance on the circumstances in which private fostering may arise can be found at Annex B of Keeping Children Safe in Education (September 2024).

## **Appendix 3: Safeguarding concerns and allegations made about staff, including supply staff, volunteers and contractors**

This appendix is divided into two parts: the first covers allegations that may meet the harms threshold, whilst the second covers allegations/concerns that do not meet the harms threshold (referred to in Part four of KCSiE as 'low level concerns').

### **Part one: allegations that meet the harms threshold**

This section of the policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- 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.

It applies regardless of whether the alleged abuse took place in a school. Where an allegation might meet the harms threshold, above, we will follow the guidance in Part four of Keeping Children Safe in Education. Where an adult makes an allegation to a school that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children's social care and the police. Abuse can be reported no matter how long ago it happened.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

#### **Supply teachers and contracted staff**

In some circumstances schools will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers or contracted staff provided by an employment agency or business.

Whilst schools are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. We will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst an investigation is carried out.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under their supervision, direction and control when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support.

The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, schools should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about policies.

#### **Suspension**

Suspension 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 it 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 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 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 have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the trust

### Definitions for outcomes of allegation investigations

- **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 (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 headteacher/chief executive officer (or relevant trust director of education/chair of the board of trustees where the headteacher/chief executive officer is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority (contact information is provided in a table at the end of this appendix). 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 LADO – 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 LADO 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 LADO (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 is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children’s social care services, as appropriate. The advice of the trust’s Head of HR (or in their absence an HR Business Partner) and the Trust Safeguarding Lead (or in their absence the trust’s linked director of education) must also be sought. Before an employee is suspended, the Headteacher must discuss it with the CEO, Deputy CEO and Chair of the local governing body, without delay.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. 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/trust 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 LADO 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 LADO to initiate the appropriate action in school 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 consider what other support is appropriate. The individual facing the allegation may wish to call the Education Support Partnership, free on 08000 562 561 or visit their website at [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- 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 and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- 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
- Inform the trust safeguarding leads, Jemma Lynch and Steve Watts ([TrustDSL@unitysp.co.uk](mailto:TrustDSL@unitysp.co.uk)) and the Director of HR ([abull@unitysp.co.uk](mailto:abull@unitysp.co.uk)) that you have made a referral to the designated officer at the local authority, providing the following information:
  - Date of referral
  - First name (of the person referred)
  - Surname (of the person referred)
  - Post (of the person referred)
  - School
  - Name of the person making the referral
  - Role of the person making the referral (this should be the Head or Director of Education if the allegation is about the Head)
  - Reason(s) for the referral

Registered Early Years providers must 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 trust 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 (TRA).

Where the police are involved, wherever possible the trust 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 trust's disciplinary process, should this be required at a later point.

## **Timescales**

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will instigate appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

## **Specific actions**

### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer (LADO) 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 trust ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the trust's Head of HR will discuss with the LADO whether to 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 case manager and the trust's Director of HR will discuss with the LADO whether to refer the matter to the Teaching Regulation Agency (TRA) 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.

### **Malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

### **Confidentiality**

The trust 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 local authority's designated officer (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. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the trust will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these 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.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated, malicious or unfounded, or any history of allegations where all such allegations have been proven to be false, unsubstantiated, malicious or unfounded.

### **Learning lessons**

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer (LADO) to determine whether there are any improvements that we can make to the trust'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

### **LADO contact information**

<b>Local Authority</b>	<b>LADO telephone number</b>	<b>LADO email</b>
Cambridgeshire	01223 727 967 (Monday to Friday during office opening hours) 01733 234 724 (Emergency Duty Team - out of hours queries)	<a href="mailto:lado@cambridgeshire.gov.uk">lado@cambridgeshire.gov.uk</a>
Essex	0333 013 9797	<a href="mailto:lado@essex.gov.uk">lado@essex.gov.uk</a>



Havering	01708 431 653	<a href="mailto:lado@havering.gov.uk">lado@havering.gov.uk</a>
Suffolk	0300 123 2044	<a href="mailto:lado@suffolk.gov.uk">lado@suffolk.gov.uk</a>
Norfolk	01603 223 473	<a href="mailto:Lado@norfolk.gov.uk">Lado@norfolk.gov.uk</a>

## Part two: concerns that do not meet the harms threshold

As part of their whole school approach to safeguarding, our schools will ensure that they promote an open and transparent culture in which all concerns about all adults working in, or on behalf of the school (including supply staff, volunteers and contractors), are dealt with promptly and appropriately.

### Low level concerns

The term 'low level' concern does not mean that it is insignificant, it means that the behaviour does not meet the harms threshold set out above. A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a nagging doubt – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff (and persons in a position of trust) code of conduct, including inappropriate conduct outside of work, but that does not meet the harms threshold for referral to the LADO. Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that might look inappropriate but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Sharing, recording and dealing with low level concerns appropriately not only keeps children safe but also protects those working in or on behalf of schools.

### Reporting low level concerns

Low level concerns should be reported as per section 7.6, above.

Staff are encouraged and should feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or, on reflection, believe they have behaved in a way they consider falls below the expected professional standards.

Where a low level concern relates to a person employed by a supply agency or a contractor, the concern should still be reported as above, and recorded as set out below. In addition, their employer should be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

### Recording low level concerns

All low level concerns will be recorded in writing. The record should include details of the concern, the context in which the concern arose, action taken and the rationale for decisions. The name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous that should be respected as far as reasonably possible. The records must be kept confidential and held securely. They must be retained at least until the individual leaves the school's/trust's employment.

### Responding to low level concerns

The headteacher (or the relevant trust director of education if the low level concern is about the headteacher or a relative of the headteacher working at the school) should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved; and,
- to any witnesses.

The headteacher should be the ultimate decision maker in respect of all low level concerns, although it is recognised that depending on the nature of some low level concerns and/or the role of the DSL in some schools, the headteacher may wish to consult with the DSL and take a more collaborative decision making approach.

If schools are in any doubt as to whether the information which has been shared about a member of staff as a low level concern in fact meets the harms threshold, they should consult with their LADO.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, it must be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school/trust that enabled the behaviour to occur and,

where appropriate, policies should be revised or extra training delivered to minimise the risk of it happening again.

### **References**

Low level concerns should not be included in references unless they relate to issues which would normally be included, for example, misconduct or poor performance. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO, and been found to be substantiated, it should be referred to in a reference.

## Appendix 4: specific safeguarding issues

### Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) schools should give them practical advice on how to keep themselves safe. Lessons should focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### Children who are absent from education

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's unauthorised absence procedures and children missing education procedures.

Where reasonably possible, our schools will hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give us additional options to make contact with a responsible adult when a child who is absent from education is also identified as a welfare and/or safeguarding concern.

We will follow our procedures for unauthorised absence and for children missing education, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school 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.

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 being missing.

If a staff member suspects that a child is suffering from abuse, neglect or exploitation 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 the child is in immediate danger or at risk of harm.

### Children with family members in prison

Children with family members in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders ([NICCO](#)) provides information designed to support professionals working with offenders and their children, to help mitigate the negative consequences for those children.

Staff will inform the DSL if they know a pupil has a family member in prison so that the DSL can ensure appropriate support is in place.

### Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse alcohol and other drugs;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

We will provide children who have been exploited with additional support to help keep them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE, as detailed above, may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'traphouse or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#). The Children's Society also provide a [toolkit](#).

### **Modern slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM (National Referral Mechanism) is available in the Modern Slavery Statutory Guidance: [Modern slavery: how to identify and support victims](#).

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organisation or in any of our supply chains under the Modern Slavery Act 2015.

### **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). 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 change grades awarded;
- denial of Service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences, including those above.

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 DSL will 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. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

Additional advice can be found at: [Cyber Choices](#), [NPCC- When to call the Police](#) and [National Cyber Security Centre](#).

### **Domestic abuse**

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### **Operation Encompass**

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when 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) in school before the child or children arrive at school the following day. This ensures that the school 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. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the [Operation Encompass](#) website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC - UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [SafeLives: young people and domestic abuse](#)
- [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

If a member of staff suspects that a pupil is experiencing or being exposed to domestic abuse, 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.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: [here](#).

### **So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage)**

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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL. As appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

### **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 7.3 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 school, 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 a 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 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 school
  - 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 one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning

disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

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 children's social care service
- Seek advice from the Forced Marriage Unit (FMU) on 020 7008 0151 or [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk) The FMU has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/the-right-to-choose-government-guidance-on-forced-marriage)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a school's safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat 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.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism. There are [factors that may indicate concern](#).

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately (see section 7.5 above) which may include the designated safeguarding lead (or deputy) making a Prevent referral. The school's designated safeguarding lead (and any deputies) should be aware of local procedures for [making a Prevent referral](#).

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty is part of schools' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in education settings should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 141-210, which are specifically concerned with education (and also cover childcare).

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

Statutory guidance on Channel is available at: [Channel guidance](#). There is also [Home Office Channel training](#) (select Course 3).



The Department for Education has published further advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support. The Home Office has developed three e-learning modules:

- All our staff complete [Prevent awareness e-learning](#), which offers an introduction to the Prevent duty
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are robust, informed and with good intention. Each school's Prevent Lead should complete this.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation. London Grid for Learning has also produced useful resources on Prevent ([Online Safety Resource Centre - London Grid for Learning \(lgfl.net\)](#)).

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff.

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 and wear a visitor's badge.

Visiting speakers, will be accompanied by a member of staff. We will not invite into a trust school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using trust facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### **Sexual violence and sexual harassment between children**

(See section 7.7 above, the trust's Harmful Sexual Behaviour guidance and Part five of KCSiE).

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can also occur online. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All our staff working with children are advised to maintain an attitude of 'it could happen here'.

Children who are victims of sexual violence and sexual harassment wherever it happens, 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. Safeguarding incidents and/or behaviours can be associated with factors outside the school, including intimate personal relationships (see also the sections above on child sexual exploitation and child criminal exploitation).

### **Sexual violence**

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. Sexual assault covers a very wide range of sexual behaviour, so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and have the freedom and capacity to make that choice. Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

### **Health needs resulting from sexual assault**

Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

### **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim;
- displaying pictures, photos or drawings of a sexual nature;
- upskirting (this is a criminal offence); and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of under 18s is a criminal offence. [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides detailed advice for schools and colleges;
  - sharing of unwanted explicit content;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media;
  - sexual exploitation; coercion and threats; and
  - coercing others into sharing images of themselves or performing acts they're not comfortable with online

### **Responding to reports of sexual violence and sexual harassment**

The initial response to a report from a child is incredibly important. How a school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims, regardless of how long it has taken them to come forward, 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

If staff have a concern about a child or a child makes a report to them, they should speak to the DSL. As is always the case, if staff are in any doubt as to what to do, they should speak to the DSL.

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per their behaviour policy.

## Annex C: Role of the Designated Safeguarding Lead

An appropriate senior member of staff, from the school leadership team, will be appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

This person should have the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

### Deputy designated safeguarding leads

Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

### Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the police as required. [NPCC – When to call the police](#) should help staff understand when to consider calling the police and what to expect when working with them.

### Work with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).
- as required, liaise with the "case manager" (as per Part four of KCSiE) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEND in a college) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at school or college. This includes:

- ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

### **Information sharing and managing the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should 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.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSiE.

Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within five days for an in-year transfer or within the first five days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare, and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Raising Awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the trust's safeguarding policy and the school's child protection procedures, especially new and part-time staff.
- ensure the school's child protection procedures are reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the local governing body regarding this.
- ensure the trust's safeguarding policy and the school's child protection procedures are available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

### **Training, knowledge and skills**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as the specific harms that can put children at risk, and the processes, procedures, and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children's social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Providing support to staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### **Understanding the views of children**

It is important that all children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSiE, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.