

Safeguarding and Child Protection Policy 2021/22

The Midland Academies Trust

Trust Executive



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Safeguarding and Child Protection Policy 2021-22

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Safeguarding and Child Protection Policy 2021/22

Section 1 - Principles, Aims, Roles, Responsibilities and Key Contact Details

1. Introduction

- 1.1 The Midland Academies Trust (the Trust) provides governance and oversight to those academies which are part of the Trust namely: The Nuneaton Academy; George Eliot School; Hartshill School; Heath Lane Academy.
- 1.2 This Policy applies to each of the academies listed above.
- 1.3 This document references the relevant local Safeguarding Board arrangements for the county in which the academy is located. Each academy is required to act in line with the guidelines/procedures contained within the model policy for the county in which the academy is located.
- 1.4 This Policy is available on the Trust's website and also on the individual websites of the academies listed above. All staff and volunteers are required to read it and confirm that they have done so before commencing work with the academy.
- 1.5 There are four main elements to our Safeguarding and Child Protection Policy:
 - i. Prevention (e.g. positive school atmosphere, teaching and pastoral support to pupils, safer recruitment procedures).
 - ii. Protection (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns).
 - iii. Support (to pupils and school staff and to children who may have been harmed or abused).
 - iv. Working with parents (to ensure appropriate communications and actions are undertaken).
- 1.6 This Policy applies to all staff, volunteers, Directors, Raising Achievement Board Members and visitors to the school. We recognise that child protection is the responsibility of all adults in school. We will ensure that all parents and other working partners are aware of this Policy by mentioning it in our school prospectus, displaying appropriate information in our reception and on academy websites and by raising awareness at meetings with parents as appropriate.

2. Definitions

- 2.1 **Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

Safeguarding also encompasses issues such as student health and safety and bullying and a range of other issues, for example, arrangements for meeting the medical needs of children by providing first aid, academy security, drugs and substance misuse and positive behaviour. There may also be other safeguarding issues that are specific to the local area or population.
- 2.2 **Child protection** refers to the processes undertaken to protect the children who have been identified as suffering, or being at risk of suffering significant harm.
- 2.3 **Child/student** is anyone who has not yet reached their 18th birthday or their 19th birthday for those students with disabilities.
- 2.4 **Staff** refers to all those working for or on behalf of the academy, full time or part time, temporary or permanent, in either a paid or voluntary capacity, including Raising Achievement Board Members and Directors.
- 2.5 **Parents** refers to birth parents and other adults who are in a parenting role, for example step parents, foster carers and adoptive parents.

- 2.6 **Designated Safeguarding Lead (DSL)** means the person within an academy with responsibility for the day to day application of the Safeguarding and Child Protection Policy.
- 2.7 **Safeguarding Link Raising Achievement Board Member** means the Raising Achievement Board Member nominated to oversee relevant Academy safeguarding matters.
- 2.8 **Children’s Social Care** means the team within the Local Authority which has a duty to safeguard and promote the welfare of children.
- 2.9 **Local Safeguarding Children Board (LCSB)** means the statutory organisation responsible for the co-ordination of the various agencies responsible for the welfare and well-being of children for example colleges, social services, police, voluntary organisations etc.

3. Related Policies and Documents

- 3.1 This Policy is one of a series in the Trust’s integrated safeguarding portfolio. Other policies related to safeguarding include:
- i. Staff Code of Conduct.
 - ii. Management of Allegations against Staff Policy.
 - iii. Health and Safety Policy.
 - iv. Anti-bullying - Students Policy.
 - v. Behaviour Policy.
 - vi. E-Safety Policy.
 - vii. Complaints Policy and Procedure.
 - viii. Link Raising Achievement Board Member Scheme Guidance
- 3.2 The procedures contained in this Policy apply to all staff, volunteers, Raising Achievement Board Members and Directors.

4. Relevant Legislation

- 4.1 Academies, free schools, independent schools, alternative providers of education - Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are students at the school.
- 4.2 The Teacher Standards 2012 state that teachers, including Principals, must have regard for the need to safeguard children’s wellbeing, in accordance with statutory provisions; and maintain public trust in the teaching profession as part of their professional duties.
- 4.3 The statutory guidance *Working Together to Safeguard Children (DfE2015)* covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for Local Safeguarding Children Boards (LSCBs) to monitor the effectiveness of local services, including safeguarding arrangements in schools.
- 4.4 The statutory guidance *Keeping Children Safe in Education (DfE Updated Annually)* is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) (England) Regulations 2014 and the Education (Non-Maintained Special Schools) (England) Regulations 2015. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children. Unless otherwise stated, ‘school’ in this guidance means all schools, whether maintained, non-maintained or independent, including academies and free schools, alternative provision academies and pupil referral units.

- 4.5 **All staff must read Part One of Keeping Children Safe in Education (Updated Annually). Staff can find copies of this on their Academy website and they are issued a copy when they start at the Academy. In addition, all staff who work directly with children must read Annex A.**
- 4.6 Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (Covid-19).
- 4.7 Each academy's safeguarding arrangements will be inspected by Ofsted under the judgements for behaviour and safety and leadership and management. The model policies in the appendices can be used by the Principal and Designated Safeguarding Lead and the Safeguarding Link Raising Achievement Board Member to ensure that the academy is effective in safeguarding matters.

5. Policy Principles and Aims

- 5.1 The Trust is committed to the following core safeguarding principles:
- i. The Trust's responsibility to safeguard and promote the welfare of children is of paramount importance.
 - ii. All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
 - iii. Children who are safe and feel safe are better equipped to learn.
 - iv. The Trust is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, Raising Achievement Board Members and Directors to share this commitment.
 - v. All staff, volunteers, Raising Achievement Board Members and Directors have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in an Academy.
 - vi. If, at any point, there is a risk of immediate serious harm to a child a referral will be made to Children's Social Care immediately. **Anybody can make a referral.** If the child's situation does not appear to be improving, any staff member with concerns should press for a re-consideration. Concerns should always lead to help for the child at some stage.
 - vii. All staff members will maintain an attitude of 'It could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members are to always act in the interests of the child.
 - viii. Students and staff involved in child protection issues will receive appropriate support.
 - ix. Policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.
- 5.2 The aims of this Policy and associated procedures are to:
- i. provide all staff, volunteers, Raising Achievement Board Members and Directors with the necessary information to enable them to meet their safeguarding and child protection responsibilities;
 - ii. ensure consistent good practice;
 - iii. demonstrate an academy's commitment with regard to safeguarding and child protection to students, parents and other partners.
 - iv. contribute to the academy's safeguarding portfolio.

6. Safeguarding and Child Protection Statement

- 6.1 The Trust recognises the moral and statutory responsibility to safeguard and promote the welfare of all students and endeavours to provide a safe and welcoming environment where children are respected and valued. The Trust is alert to the signs of abuse and neglect and will follow the set procedures to ensure that children receive effective support, protection and justice.

- 6.2 In upholding this statement the Trust expects that all staff will adhere to good practice in relation to safeguarding / child protection, as outlined below:
- i. Treating all students with respect.
 - ii. Setting a good example by conducting themselves appropriately.
 - iii. Involving students in decisions that affect them.
 - iv. Encouraging positive, respectful and safe behaviour among students,
 - v. Being a good listener.
 - vi. Being alert to changes in students' behaviour and to signs of abuse and neglect.
 - vii. Recognising that challenging behaviour may be an indicator of abuse.
 - viii. Reading and understanding the Trust's Safeguarding and Child Protection Policy, safeguarding and child protection procedures, the Staff Code of Conduct and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact and information-sharing.
 - ix. Reading and understanding relevant government guidance regarding additional safeguarding implications of responding to the coronavirus (Covid-19) outbreak
 - x. Asking the student's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid, unless the student's behaviour is in danger of causing harm to themselves or others.
 - xi. Maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language.
 - xii. Being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.
 - xiii. Applying the use of reasonable force and physical intervention only as a last resort and in compliance with academy procedures.
 - xiv. Following the academy's rules with regard to communication with students and use of social media and online networking.
 - xv. Referring all concerns about a student's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Social Care.
- 6.3 All staff, volunteers, Raising Achievement Board Members and Directors are to be aware that the Trust regards that inappropriate behaviour towards students as unacceptable and that their conduct towards students must be beyond reproach.
- 6.4 Staff, volunteers, Raising Achievement Board Members and Directors should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the academy staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

7. Key Personnel and Contact Details

- 7.1 The Trust's Senior Designated Safeguarding Lead (DSL) is Robin Shakespeare, Director of Education. Contact details: email: robin.shakespeare@midlandat.co.uk. tel: 02476243532.
- 7.2 The Trust's deputy Designated Safeguarding Lead is Alex Ward, Academy Vice Principal and DSL (Operational oversight and chair of Trust Academies Senior DSL Team) Contact details: email: Alex.ward@midlandat.co.uk
- 7.3 **DSL Details - George Eliot School:**
Senior DSL: Dee Stanton Dee.Stanton@midlandat.co.uk

Safeguarding Officer: Angela Ruston Angela.Ruston@midlandat.co.uk

7.4 DSL Details - Hartshill School:

Senior DSL: Alexander Ward Alexander.Ward@midlandat.co.uk

Safeguarding Officer: Kathleen Simpson Kathleen.Simpson@MidlandAT.co.uk

7.5 DSL Details - Heath Lane Academy:

Senior DSL: Deborah Smith Deborah.Smith@midlandat.co.uk

Safeguarding Officer: Jamie Wheeler Jamie.Wheeler@midlandat.co.uk

7.6 DSL Details - The Nuneaton Academy:

Senior DSL: Simon Trout Simon.Trout@midlandat.co.uk

Safeguarding Officer: Karen Thompson Karen.Thompson@midlandat.co.uk

7.7 RAB Link Member for Safeguarding:

Tim Render - The George Eliot School and Hartshill School

Ann Melville - Heath Lane Academy and The Nuneaton Academy

Contact should be made through the Company Secretary, Rachel Marshall: Telephone: 0330 058 3000 ext. 3333 / email: rachel.marshall@nwslc.ac.uk

8. Roles and Responsibilities

8.1 The Trust's Board of Directors and the Academy's Raising Achievement Board will ensure that each academy:

- i. Implements the Safeguarding and Child Protection Policy, including a Staff Code of Conduct, which are consistent with the Warwickshire or Leicestershire Safeguarding Children Board's and statutory requirements and national guidance, reviewed annually and made available publicly on the Academy's website and other means.
- ii. Has procedures for dealing with allegations of abuse made against members of staff, supply staff and volunteers including allegations made against the Principal and allegations against other children, that are consistent with Warwickshire or Leicestershire Safeguarding Children Board's and statutory requirements/national guidance.
- iii. Has safer recruitment procedures that include at least one person on any appointment panel who has undertaken safer recruitment training and statutory checks on staffs' and volunteers' suitability to work with children that are consistent with Warwickshire and Leicestershire Safeguarding Children Board's and statutory requirements/national guidance.
- iv. Appoints a Designated Safeguarding Lead (DSL) who is a senior member of staff and who has undertaken training in inter-agency working, in addition to basic child protection training.
- v. Ensures that the DSL role is explicit in the role holder's job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.
- vi. Appoints a Safeguarding Link Raising Achievement Board Member for each Raising Achievement Board. The role of the Safeguarding Link Raising Achievement Board Member is set out in the Link Raising Achievement Board Member Scheme Guidance Document.
- vii. Develops an induction strategy that ensures all staff, including the Principal, receive information about the academy's safeguarding arrangements on induction and appropriate child protection training, staff behaviour policy and the role of the DSL on induction
- viii. Develops a training strategy that ensures that all staff, including the Principal, and volunteers receive appropriate training which is regularly updated in as required (at least annually) The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.

- ix. Appoints a designated teacher to promote the educational achievement of children who are looked after by the Local Authority and ensures that the designated teacher has appropriate training.
 - x. Teaches students about safeguarding, including how to keep themselves safe at all times including when online as part of a broad and balanced curriculum.
 - xi. Remedies without delay, any deficiencies or weaknesses regarding safeguarding and child protection arrangements.
- 8.2 The Trust's Chief Executive is responsible for liaising with the relevant Local Authority and / or partner agencies in the event of allegations of abuse being made against an academy Principal.
- 8.3 Each academy must appoint a senior member of staff to become the Designated Safeguarding Lead (DSL) and to co-ordinate child protection arrangements and to ensure that there are appropriate cover arrangements. The DSL will have the status and authority within the Academy to carry out the duties of the post, including committing resources and supporting and directing other staff. They will be appropriately trained for the role, with updates every two years.
- 8.4 In addition, each academy must appoint at least one other individual as the Deputy Designated Safeguarding Lead(s) who is/are appropriately trained and, in the absence of the DSL, carries out those functions necessary to ensure the on-going safety and protection of students. In the event of the long-term absence of the DSL, the deputy will assume all of the functions of the DSL.
- 8.5 **The DSL's responsibilities include:**
- 8.5.1 General Responsibilities:
- i. Is a senior member of staff from the academy's leadership team and therefore has the status and authority within the academy to carry out the duties of the post, including committing resources and supporting and directing other staff.
 - ii. Takes the lead responsibility for safeguarding and child protection in the academy which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies
 - iii. Is appropriately trained, receives refresher training at two yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role.
 - iv. Acts as a source of support and expertise to the Academy community on matters of safeguarding and child protection.
 - v. Encourages among all staff, a culture of listening to children and taking account of their wishes and feelings, in any measures the Academy may put in place to protect them.
 - vi. Is alert to the specific needs of children in need, those with special educational needs, looked after children and young carers.
- 8.5.2 Managing Referrals:
- i. Develops effective links with relevant statutory and voluntary agencies including Warwickshire's/Leicestershire's Safeguarding Children Board.
 - ii. Has a working knowledge of Warwickshire's/Leicestershire's Safeguarding Children Board procedures.
 - iii. Has an understanding of and contributes to the Early Help process to ensure effective assessment and understanding of children's additional needs in order to inform appropriate provision of early help and intervention.
 - iv. Keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from, the student's general file.
 - v. Refers cases of suspected abuse to Children's Social Care or the Police.
 - vi. Attends and/or contributes to child protection conferences, strategy meetings and multi-agency sexual exploitation (MASE) meetings.

- vii. Co-ordinates the Academy's contribution to child protection plans as part of core groups, attending and actively participating in core group meetings.
- viii. Notifies Children's Social Care if a child with a child protection plan is absent for more than two days without explanation.
- ix. Ensures that when a student with a child protection plan leaves the school, their information is passed securely to their new school as soon as possible but transferred separately from the main student file and the student's social worker is informed.

8.5.3 Training and Raising Awareness:

- i. Ensures that all staff (including temporary staff and volunteers) sign to indicate that they have read and understood the Safeguarding / Child Protection Policy, the local safeguarding and child protection procedures from the relevant model policy and the Staff Code of Conduct.
- ii. Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in the current version of '*Keeping Children Safe in Education*', ensuring that all staff receive necessary training, information and guidance;
- iii. Keeps a record of staff attendance at child protection training.
- iv. Liaises with the nominated safeguarding link RAB member and the Principal (where the DSL role is not carried out by the Principal) as appropriate.
- v. Ensures that the Safeguarding / Child Protection Policy and Procedures is regularly reviewed and updated annually, working with the whole school community of pupils, parents, volunteers and RAB members and or proprietors regarding this.
- vi. Makes the Safeguarding / Child Protection Policy and Procedures available publicly, i.e. on the Academy's website or by other means.
- vii. Ensures parents are aware of the Academy's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- viii. Ensures that the Principal is aware of their responsibility under *Working Together 2015* to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Local Authority Designated Officer (LADO) within one working day prior to any internal investigation and to the Disclosure and Barring Service (DBS) as appropriate.
- ix. liaises with the Principal to inform them of issues especially on-going enquiries under section 47 of the Children Act 2004 and police investigations.
- x. ensures that the Deputy Designated Safeguarding Lead is appropriately trained to the same level as the DSL in order to carry out the functions of the designated senior person in his/her absence. In the event of a long-term absence the deputy will assume all the actions above.

8.6. The Principal's responsibilities include:

- i. Ensuring that the Safeguarding and Child Protection Policy, the local safeguarding and child protection procedures, the Staff Code of Conduct, procedures for dealing with allegations of abuse made against members of staff and volunteers, and safer recruitment procedures are understood and implemented by all staff and volunteers.
- ii. Allocating sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy/s to carry out their roles effectively, including the assessment of students, inter-agency working and plans and attendance at strategy discussions and other necessary meetings.
- iii. Explicitly defining the DSL's role in the role holder's job description; supporting the designated teacher for looked after children to promote the educational achievement and personal development of any students who are looked after by the Local Authority and to ensure that all staff have the skills, knowledge and understanding necessary to keeping looked after children safe.

- iv. Ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively.
- v. Ensuring that students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe at all times including when online as part of a broad and balanced curriculum.
- vi. Referring all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Local Authority Designated Officer (LADO) **within one working day prior to any internal investigation.**
- vii. Ensuring that anyone who has been dismissed or removed due to safeguarding concerns, would have been had they not resigned or may pose a risk of harm to a child, is referred to the Disclosure and Barring Service, as advised by the LADO.
- viii. Informing the Police where a crime may have been committed, this specifically includes suspected cases of FGM.
- ix. Appointing a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.
- x. Preparing an annual report to be presented to the Raising Achievement Board and then the Board of Directors, outlining how the Academy has fulfilled its duties in relation to safeguarding and child protection.

8.7 All staff (including temporary staff and volunteers) will:

- i. Fully comply with the Trust's Policies, local safeguarding and child protection procedures and Staff Code of Conduct.
- ii. Read , become familiar with, and act in accordance with appendix 1 of this Policy 'Keeping Children Safe in Education (updated annually), part one' and sign the relevant documentation to say that they have done so; ensure they know who the DSL is and their role.
- iii. Attend appropriate training.
- iv. Refer all concerns about a student's safety and welfare to the DSL or Principal or, if necessary, directly to the Police or Children's Social Care. This includes fulfilling mandatory duties as outlined in 'Keeping Children Safe in Education (updated annually)'.

Section 2 - Procedures, Signs And Symptoms And Support For Pupils and Families

1. Recognising Abuse (Signs and Symptoms)

- 1.1 To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.
- 1.2 Abuse and neglect are forms of maltreatment of children. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.
- 1.3 Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by adult men or women or by other children or young people. Staff are trained to understand and recognise indicators of all four categories of abuse as defined below.
- 1.4 There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect:

1.4.1 Physical Abuse

A form of abuse which 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 (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

1.4.2 Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

1.4.3 Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see section 31).

1.4.4 Neglect

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

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

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

Definitions taken from the current version of *Keeping Children Safe in Education*.

1.5 Indicators of Abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- i. have bruises, bleeding, burns, fractures or other injuries;
- ii. show signs of pain or discomfort;
- iii. keep arms and legs covered, even in warm weather;
- iv. be concerned about changing for PE or swimming;
- v. look unkempt and uncared for;
- vi. change their eating habits;
- vii. have difficulty in making or sustaining friendships;
- viii. appear fearful;
- ix. be reckless with regard to their own or other's safety;
- x. self-harm;
- xi. frequently miss school or arrive late;
- xii. show signs of not wanting to go home;
- xiii. display a change in behaviour - from quiet to aggressive, or happy-go-lucky to withdrawn;
- xiv. challenge authority;
- xv. become disinterested in their school work;
- xvi. be constantly tired or preoccupied;
- xvii. be wary of physical contact;
- xviii. be involved in, or particularly knowledgeable about drugs or alcohol;
- xix. display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development; and/or
- xx. acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report all of their concerns, however minor or insignificant they may think they are, they do not need 'absolute proof' that the child is at risk.

1.6 Impact of Abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by one or more of the following: anxiety, depression or other mental health difficulties, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships, unfulfilled potential and long-term physical health difficulties.

1.7 Taking Action

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".

Key points for staff to remember when taking action are:

- i. in an emergency take the action necessary to help the child, for example, call 999;
- ii. report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day;

- iii. do not start your own investigation; share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- iv. complete a record of concern, using CPOMS.
- v. seek support for yourself if you are distressed or need to debrief.

1.8 **If a Member of Staff or Volunteer Is Concerned About a Pupil's Welfare**

There will be occasions when staff may suspect that a pupil may be at risk without unequivocal evidence. The pupil's behaviour may have changed, their artwork could be unusual or bizarre, they may write stories or poetry that reveal confusion or distress or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. Staff are encouraged and supported to ask pupils if they are OK, if there is anything the child would like to talk to them about and if they can help in any way. Staff are trained to do this by asking appropriate open questions which do not lead the child in any particular direction but invite the child to talk about anything if they wish to.

If the pupil does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help process as in section 8 of this policy.

1.9 **If a Pupil Discloses to a Member of Staff or Volunteer**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep unsafe secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen but if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

If pupils have been completing the Taking Care curriculum they will have been taught about confidentiality and will generally understand the concept of safe and unsafe secrets. They should have a good knowledge and understanding of why staff cannot keep some information confidential but also know that information is passed on to specific people on a 'need to know' basis only.

During their conversations with pupils, staff will:

- i. Allow the child to speak freely.
- ii. Remain calm and not overreact; the pupil may stop talking if they feel they are upsetting their listener.
- iii. Give reassuring nods or words of comfort: **'I'm glad you told me'; 'Thank you for telling me'; 'You're doing very well'; 'I believe you'; 'What happened to you is not your fault'; 'This isn't your fault'; 'I'm going to do what I can to help you'**.
- iv. Not be afraid of silences; staff must remember how hard this must be for the pupil.
- v. **Under no circumstances** ask investigative questions such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about it. **However**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. 'when did this happen', 'where did this happen?'
- vi. At an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on.

- vii. Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- viii. Avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong.
- ix. Tell the pupil what will happen next.
- x. Let the pupil know that someone (either the member of staff or another named person, e.g. the DSL) will come to see them before the end of the day.
- xi. Report verbally to the DSL (or to a Principal if the child has made an allegation against a member of staff).
- xii. Write up their conversation as soon as possible on the **record of concern form** Form C (Green form) (*Delete and insert alternative recording system as appropriate*) and hand it to the DSL (or headteacher if the child has made an allegation against a member of staff).
- xiii. Seek support if they feel distressed or need to debrief.

1.10 Notifying Parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Social Care.

1.11 Making a Referral to Children's Social Care

The current version of Keeping Children Safe in Education emphasises that the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL will make a referral to Children's Social Care (and if appropriate the Police) if it is believed that a pupil is suffering or is likely to suffer significant harm.

The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay. The current version of *Keeping Children Safe in Education* also emphasises that **all** staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

1.12 Statutory Assessments Children In Need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. 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.

1.13 Children Suffering Or Likely To Suffer Significant Harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

1.14 Referrals to Children's Social Care

Where a child has been harmed, is at risk of harm, or is in immediate danger, the school will make a referral to Children's Social Care. All instances of sexual activity between pupils/pupils on the school premises will be referred to Children's Social Care. All instances of sexual violence perpetrated by a child under ten years of age will be referred to Children's Social Care. This will facilitate a consultation about the role of the Police. Whilst the age of criminal responsibility is 10 years, the starting principle of reporting to the Police remains (this will usually be done through Local Authority Social Care). The Police will take a welfare, rather than a criminal justice, approach.

The school will generally inform parents or carers unless there are compelling reasons not to (i.e. if informing a parent or carer is going to put the child at additional risk or create undue delay). Any such decision should be made with the support of Children's Social Care.

Collaborative working will help ensure that the best possible package of co-ordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support. However, the school will not wait for the outcome (or even the start) of a Children's Social Care investigation before protecting the victim and other children in the school. The DSL (or a deputy) will work closely with Children's Social Care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment as above will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, any other children directly involved in the safeguarding report and all children at the school should be **immediate**.

In some cases, Children's Social Care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the DSL or a deputy) will refer again if we believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.

1.15 Reporting to the Police

Any report to the Police will generally be in parallel with a referral to Children's Social Care (as above).

Where the school receives a report of rape, assault by penetration or sexual assault, the starting point is this should be passed on to the Police. It is the prerogative of victims and their parents/carers to make direct complaints to the Police. However, the school should also be very clear with victims and parents/carers that the school has a duty to ensure the Police are informed when an alleged crime has been committed in order to safeguard other young people.

Where a serious crime is reported, the school can report directly to the local Police station. However, in most circumstances, the school will consult with the Local Authority Social Care in the first instance in order to ensure that both the Police and Children's Social Care are informed.

Where a report has been made to the Police, the school should consult the Police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

In some cases, it may become clear very quickly, that the Police (for whatever reason) will not take further action. In such circumstances, it is important that the school continue to engage with specialist support for the victim as required.

The school will also be informed by the Police or Children's Social Care about referrals made directly to those agencies from other sources (e.g. family members, family friends, parents of other children) in relation to alleged sexual offences or harmful sexual behaviours displayed by pupils inside and/or outside school.

In all such circumstances, the school may be required to attend a strategy meeting under WS inter-agency child protection procedures in order to facilitate risk management and planning with other agencies.

The school is committed to participating in plans both to provide pupils who are at risk from other children and those pupils who may present a risk to other children with appropriate services to address any concerns and, wherever possible, to facilitate ongoing access to education in school for all children concerned, subject to appropriate risk assessments and risk management plans.

1.16 Subsequent Considerations

The needs and wishes of the victim should continue to be paramount (along with protecting the child) as the case progresses. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.

Similarly, the alleged perpetrator/s has an ongoing right to an education and should be able to continue in their normal routine subject to the ongoing risk assessment and the needs of the victim.

Where a pupil is subject of bail conditions, the school will work with Children's Social Care and the Police to manage any implications and safeguard all pupils/pupils concerned without jeopardising the Police investigation.

If a pupil is convicted or receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all pupils and consider any suitable action in light of the behaviour policy. If the perpetrator remains at the school along with the victim, the school will meet with the pupil and her/his parents/carers to revisit and reiterate in writing expectations of the perpetrator in terms of future behaviour and complying with any restrictions and arrangements put in place to safeguard the victim and other pupils.

In the light of possible publicity, speculation and interest within the pupil and parent body, the school will consider any other measures necessary to safeguard both the victim and perpetrator, especially from any bullying or harassment (including online).

In respect of a not guilty verdict or a decision not to progress with a criminal prosecution, the school recognises that this will likely be traumatic for the victim and will continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Support will be tailored on a case-by-case basis. Support can include emotional and practical support for victims from Children and Young People's Independent Sexual Violence Advisors in the specialist sexual violence sector; and/or provision of a designated trusted adult in the school of the pupil's choice to talk to about their needs. Every effort will be made to avoid isolating the victim, in particular from supportive peer groups, but it is recognised that there may be times when a victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. The school will provide a physical space for the victim to withdraw.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will consider any suitable sanctions in light of the behaviour policy, including consideration of permanent exclusion. In all but the most exceptional of circumstances, the rape or assault will constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the school would seriously harm the education or welfare of the victim (and potentially other pupils).

Where the perpetrator is going to remain at the school, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The school will have a difficult balancing act to consider. On one hand it needs to safeguard the victim (and the wider pupil body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice will be taken, as appropriate, from Children's Social Care, specialist sexual violence services and the Police.

If a perpetrator (alleged or convicted) does move to another educational institution (for any reason), the school will make the new educational institution aware of any ongoing support needs and, where appropriate, potential risks to other children and staff. The DSL will take responsibility to ensure this happens as well as transferring the child protection file.

2. Children Who May be Particularly Vulnerable

- 2.1 The Trust recognises that some children are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability such as societal attitudes and assumptions including prejudice and discrimination; child protection procedures that are inadequately responsive to children's diverse circumstances; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; as well as an individual child's personality, behaviour, disability and family circumstances.
- 2.2 To ensure that all of students receive equal protection, the Trust will give special consideration to children who are:
- i. in need of a social worker (Child in Need and Child Protection Plans)
 - ii. disabled, have special educational needs or have mental health needs;
 - iii. young carers;
 - iv. living in a domestic abuse or violent situation;
 - v. affected by parental substance misuse;
 - vi. asylum seekers;
 - vii. looked after, or previously looked after (care leavers), by the Local Authority;
 - viii. otherwise living away from home;
 - ix. vulnerable to being bullied, or engaging in bullying behaviours;
 - x. living in temporary accommodation;
 - xi. living transient lifestyles;
 - xii. living in chaotic and unsupportive home situations;
 - xiii. vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
 - xiv. involved directly or indirectly in child sexual exploitation (CSE);
 - xv. do not have English as a first language;
 - xvi. at risk of female genital mutilation (FGM) or forced marriage;
 - xvii. at risk of becoming radicalised, involved in gangs and/or violent extremism.
 - xviii. at risk of honour-based abuse

This list provides examples of additionally vulnerable groups and is not exhaustive.

3. Attendance

- 3.1 It is recognised by the Trust that full attendance at school is important to the well-being of all students and enables them to access the opportunities made available to them at school. Attendance is monitored closely, and each Academy works closely in partnership with the relevant local authority attendance compliance and enforcement service when the patterns of absence give rise to concern.
- 3.2 The Trust is aware that a child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unauthorised absence, particularly where children go missing on repeated occasions and will follow the Department for Education's legal requirements for schools in respect of recording and reporting of children who leave school without any known destination.
- 3.3 The Academy Attendance Policy is set out in a separate document and is reviewed regularly by the Raising Achievement Board and the Board of Directors,

4. Helping Students to Keep Themselves Safe

- 4.1 *Keeping Children safe in Education* requires governing bodies to ensure that children are taught about safeguarding, including keeping safe online, through teaching and learning opportunities, as part of providing a “broad and balanced curriculum”.
- 4.2 The Trust is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe.
- 4.3 Students are taught to understand and manage risk through the Personal, Social, Health and Economic (PSHE) education lessons and through all aspects of Academy life.
- 4.4 All students are aware of who the senior member of staff with responsibility for child protection is, but that they can also talk to any member of staff regarding being at risk of harm or abuse.
- 4.5 Students are informed as to who they might talk to, both in and out of the Academy, their right to be listened to and heard and what steps can be taken to protect them from harm.
- 4.6 The Academy’s arrangements for consulting with and listening to students are through the Academy Council System, House Council, LGBT Plus, Form Tutors, Pastoral Leaders, Progress Coaches and other external agencies contracted by the Academy.
- 4.7 Discussions about risk will include talking to children about the risks and issues associated with young people sending, receiving and/or disseminating indecent images of themselves and other young people, which is widely referred to as ‘sexting’.
- 4.8 When concerns are identified, staff will always speak to children and will inform parents about their concerns unless there is good reason to believe that doing so would place the child at increased risk of significant harm.
- 4.9 The DSL will also need to consider the Fraser guidelines in making a judgement about whether or not to respect a young person’s request not to inform his/her parents/carers.
- 4.10 Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity by under 13 year olds will therefore be referred to the Police.

5. Partnership with Parents

- 5.1 The Trust is committed to working with parents positively, openly and honestly. The Academy will ensure that all parents are treated with respect, dignity and courtesy. Parents’ rights to privacy and confidentiality are respected and the Academy will not share sensitive information unless it has permission, or it is necessary to do so in order to protect a child.
- 5.2 The Academy will share with parents any concerns it may have about their child, unless to do so may place a child at risk of harm.
- 5.3 The Academy will encourage parents to discuss any concerns they may have with their child’s Pastoral Leader.
- 5.4 The Academy will make parents aware of this Policy through the Academy website and Prospectus.

6. Partnerships with Others

- 6.1 The Trust recognises that it is essential to establish positive and effective working relationships with other agencies who are partners in the Warwickshire/Leicestershire Local Safeguarding Children Boards.
- 6.2. There is a joint responsibility on all these agencies to share information to ensure the safeguarding of all children.

7. Support for Students, Families and Staff Involved in a Child Protection Issue

- 7.1 It is recognised that a student's welfare is paramount, however good child protection practice and outcome relies on a positive, open and honest working partnership with parents.
- 7.2 Whilst the Academy may, on occasion, need to make referrals without consultation with parents, every effort will be made to maintain a positive working relationship with parents whilst fulfilling the Academy's duties to protect the student.
- 7.3 The Trust recognises that staff dealing with disclosures of information may need support themselves and in such circumstances each Academy will provide appropriate in-house support or access to external services.
- 7.4 The Academy will support students, their families and staff by:
- i. taking all suspicions and disclosures seriously;
 - ii. nominating a link person who will keep all parties informed and be the central point of contact;
 - iii. where a member of staff is the subject of an allegation made by a student, separate link people will be nominated to avoid any conflict of interest;
 - iv. providing proper explanations (appropriate to age and understanding), as to what action is being taken on their behalf and why;
 - v. responding sympathetically to any request from students or staff for time out to deal with distress or anxiety;
 - vi. maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
 - vii. storing records securely;
 - viii. offering details of helplines, counselling or other avenues of external support;
 - ix. when appropriate, following the procedures laid down in the Trust's whistleblowing, complaints and disciplinary procedures;
 - x. co-operating fully with relevant statutory agencies.

8. Site Security

- 8.1 Visitors to the Academy, including contractors, are to sign in at reception and are given an identity badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in.
- 8.2 All visitors are expected to observe the Academy's safeguarding and health and safety regulations to ensure students are kept safe.
- 8.3 The Principal will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site in line with the requirements of the current version of *Keeping Children Safe in Education*.

9. Extended School and Off-Site Arrangements

- 9.1 Where extended school activities are provided by and managed by the Academy, the Academy's Safeguarding and Child Protection Policy and Procedures apply. If other organisations provide services or activities on the Academy site, the Academy will check that those organisations have appropriate procedures in place, including safer recruitment procedures.
- 9.2 When Academy students attend off-site activities, including day and residential visits and work related activities, the Academy will check that effective child protection and whistleblowing arrangements are in place.

10. Work Experience

- 10.1 The Academy has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervising students on work experience which are in accordance with the guidance in the current version of *'Keeping Children Safe in Education'*.
- 10.2 The Student Support Manager holds responsibility for work experience, line managed by the Assistant Principal Support and Progress.

11. Alternative Provision

- 11.1 KCSiE states that "Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. Schools 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 the school would otherwise perform in respect of its own staff." The school will act in accordance with that guidance.
- 11.2 The DSL will maintain an overview of all pupils accessing any part of their learning from an alternative provider or via delivery online or offsite provided by any organisation or individual not employed by the school. The DSL will ensure that robust arrangements are in place for timely and effective two-way sharing of safeguarding information - including records of all safeguarding concerns - between the school and alternative/external providers.
- 11.3 The DSL will also take responsibility for ensuring that robust procedures are in place to confirm attendance and to enable the swift reporting of non-attendance and children going missing from alternative/ external providers at any time when they should be with that provider. The DSL will also ensure that effective quality assurance arrangements are in place in order to monitor the ongoing effectiveness of all safeguarding arrangements that alternative/external providers have in place.

12. Children Staying with Host Families

- 12.1 The school may make arrangements for students to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the Academy will follow the guidance in the current version of *'Keeping Children Safe in Education, Annex E'* to ensure that hosting arrangements are as safe as possible.
- 12.2 Some overseas students may reside with host families during school terms and the Academy will work with the Local Authority to check that such arrangements are safe and suitable.

13. Photography and Images

- 13.1 In order to protect students the Academy will:
 - i. seek their consent and parental consent for photographs or video images to be taken/published;
 - ii. ensure students are appropriately dressed;
 - iii. encourage students to tell a member of staff if they are worried about any photographs that are taken of them;
 - iv. only use school owned equipment to record and store images or video taken by staff or volunteers on the school site or during offsite school activities including residential visits.
- 13.2 When using images for publicity purposes, the Academy will:
 - i. avoid naming students where possible;
 - ii. if it is necessary to name students, use first names only;
 - iii. where children are named, avoid using their image;

- iv. establish whether the image will be retained for further use, where and for how long;
 - v. ensure that images are stored securely and used only by those authorised to do so.
- 13.3 Visiting professionals who work directly with children are subject to the same restrictions as school staff and volunteers in respect of recording and storing images of children.
- 13.4 However, some visiting professionals are permitted to record images of the premises only specifically for professional purposes and in order to support the school, e.g. professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

14. E-Safety

- 14.1 The Academy's E-Safety Policy explains how students are kept safe in school when using technology.
- 14.2 Children and young people commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, MSN, Tumblr, Snapchat and Instagram.
- 14.3 Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children and the use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm through child criminal and sexual exploitation; county lines activity; radicalisation; sexual predation and cyber bullying.
- 14.4 The breadth of issues within online safety is considerable, but can be categorised into three areas of risk:
- i. **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
 - ii. **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
 - iii. **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- 14.5 Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites in school. Many pupils own or have access to handheld devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community
- 14.6 Cyber bullying and sexting by students, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through the Trust's Anti-Bullying Procedures.
- 14.7 Staff also receive advice regarding personal online activity, use of social networking and electronic communication with pupils, about which there are strict rules. Staff found to be in breach of these rules may be the subject of a referral to the Designated Officer in the Local Authority and may be subject to disciplinary action.
- 14.8 The school is unable to filter activity on devices not owned by the school. Parents may find it useful to refer to <https://www.internetmatters.org/blog/parental-controls/broadband-mobile/> for guidance on putting some restrictions in place to keep children safe online. Nonetheless, all staff receive online safety training and are trained to be vigilant about and to report any concerns about risk to children online in the same way that they notice and report offline concerns. The school's online safety policy explains how we try to keep pupils safe in school and protect and educate pupils in the safe use of technology. The school has appropriate filters and monitoring systems in place to protect children from potentially harmful online material.
- 14.9 Staff will always respond if informed that children have been involved in sharing indecent images. The DfE guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (Dec 2020) will be used to guide the school's response on a case by case basis.

The key points for staff being:-

- i. Report immediately to the DSL
- ii. Never view, copy, print, share, store or save the imagery, or ask a child to share or download – this is illegal.
- iii. If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- iv. Do not delete the imagery or ask the young person to delete it.
- v. Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- vi. Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- vii. Do not say or do anything to blame or shame any young people involved.
- viii. Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

15. Online Lessons and Communication Between Staff and Pupils

- 15.1 Where school staff are delivering lessons online or virtually (e.g. to children unable to attend school due to COVID-19 or ill health), all such lessons will be delivered in accordance with the school's safeguarding and child protection, staff behaviour (code of conduct) and acceptable use of ICT policies. This will ensure that the school's filtering and monitoring software is enabled.
- 15.2 The school will take account of guidance from DfE in relation to the planning and delivery of online learning when it is issued; as well as nationally recognised guidance including [guidance from the UK Safer Internet Centre on safe remote learning](#) and [London Grid for Learning on the use of videos and livestreaming](#).
- 15.3 Staff will always use school owned devices and accounts for the delivery of online/virtual lessons. Where possible, applications that facilitate the recording of lessons will be used subject to data protection and retention/storage guidelines. School leaders will randomly sample recorded lessons in order to safeguard pupils and staff and to ensure that policies are being followed.
- 15.4 When delivering online/virtual lessons on a one-to-one basis or communicating with vulnerable children who are not attending school via video chat, staff will speak to parents/carers before lessons/conversations commence and when they finish before logging off.
- 15.5 The school will request and obtain written consent from parents/carers including consent to record lessons and video conversations before staff communicate with children online.
- 15.6 It is important that all staff who interact with children online continue to look out for signs that a child may be at risk, distressed for some reason or vulnerable in some other way; and report and record any concerns to the DSL in the normal way. The DSL will respond to any such concern as they would any other safeguarding concern.
- 15.7 The school will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.
- 15.8 Online/virtual lessons should be timetabled, and the Principals or DSL will be able to drop into any virtual lesson at any time – the online version of entering a classroom for pupil welfare and safeguarding purposes. Staff delivering online/virtual teaching will be expected to display the same standards of dress and conduct that they would when working face to face in school, modelling appropriate behaviour and presentation to pupils and parents.
- 15.9 Below are other issues that staff need to take into account when delivering online/virtual lessons or communicating with children online, particularly where webcams are used:
 - i. Staff and children must be fully dressed and wear suitable clothing, as should anyone else in the household.

- ii. Any computers used should be in appropriate areas, for example not in bedrooms; and the background should be blurred. If it is not possible to blur the background, staff must consider what children can see in the background and whether it would be appropriate in a classroom. This includes photographs, artwork, identifying features, mirrors etc.
 - iii. Staff will ensure that resources and videos used are age appropriate. The child may not have support immediately to hand at home if they feel distressed or anxious about content.
 - iv. Live classes should be recorded so that if any issues were to arise, the video can be reviewed.
 - v. Live classes will be kept to a reasonable length of time so that children do not have too much screen time and in order to minimise disruption for the family.
 - vi. Language must be professional and appropriate, including that used by any family members in the background.
 - vii. Staff must only use platforms specified by senior managers and approved by the school's ICT manager/co-ordinator for communication with pupils
 - viii. Staff should record the length, time, date and attendance of any sessions held.
- 15.10 Staff members delivering lessons or communicating with children online/virtually will raise any issues in respect of inappropriate dress, setting, behaviour etc with the child and/or parent immediately and will end the online interaction if necessary. Any such incident will be recorded and reported to the DSL.
- 15.11 If a staff member believes that a child or parent is recording a lesson or conversation without prior consent, the lesson will be brought to an end or the child will be logged out immediately.
- 15.12 In **rare and exceptional circumstances** where staff urgently need to contact a pupil or parent by telephone and do not have access to a school-owned device, they will discuss this with a senior member of staff. If it is agreed there is no alternative to using a personally owned device, staff members will always use 'caller withheld' to ensure the pupil and/or parent is not able to identify the staff member's personal contact details.

16. Peer on Peer Abuse, Sexual Violence And Sexual Harassment

- 16.1 This Trust believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other pupils in the school.
- 16.2 Children may be harmed by other children or young people. All staff recognise that children can abuse their peers and are trained to understand and implement the school's policy and procedures regarding peer on peer abuse. All peer on peer abuse is unacceptable and will be taken seriously. It is most likely to include, but is not limited to:
- i. bullying (including cyber bullying);
 - ii. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - iii. sexual violence, such as rape, assault by penetration and sexual assault;
 - iv. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
 - v. sexting including pressuring another person to send a sexual image or video content (also known as youth produced sexual imagery);
 - vi. upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (upskirting is a criminal offence and may constitute sexual harassment). Anyone of any gender can be a victim;
 - vii. teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;

- viii. initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them; and
 - ix. prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.
- 16.3 Bullying is a very serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people.
- 16.4 All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the school's anti-bullying procedures. All pupils and parents receive a copy of the procedures on joining the school and the subject of bullying is addressed at regular intervals in PSHE education. All members of staff receive a copy of the school's behaviour policy, which contains the anti-bullying procedures, as part of their induction and are trained to be aware of the harm caused by bullying and to respond to all incidents of bullying and peer on peer abuse proactively.
- 16.5 Abuse is abuse and will not be tolerated, minimised or dismissed as 'banter'; 'just having a laugh'; 'part of growing up'; 'boys being boys'; or 'girls being girls'. Different gender issues can be prevalent when dealing with peer on peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Whilst mindful of the particular vulnerability of women and girls to violence, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group.
- 16.6 We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's behaviour policy. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.
- 16.7 Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Members of staff to whom such allegations are made and/or who become concerned about a pupil's sexualised behaviour, including any known online sexualised behaviour, should record their concerns in the usual way on CPOMS and report them to the DSL as soon as possible, as with any other safeguarding concern.
- 16.8 It is likely that for an allegation or concern to be addressed under child protection procedures, some of the following features will be found. The allegation or concern:
- i. is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil;
 - ii. is of a serious nature, possibly including a criminal offence;
 - iii. raises risk factors for other pupils in the school;
 - iv. indicates that other pupils may have been affected by this pupil;
 - v. indicates that young people outside the school may be affected by this pupil.
- 16.9 It is important for the school to consider the wider environmental factors and context within which peer on peer abuse occurs (please also see *Contextual Safeguarding* below). Such factors may include the potential for bullying and peer on peer abuse to take place across a number of social media platforms and services; and for things to move from platform to platform online. The school will also consider the potential for the impact of the incident to extend further than the school's local community (e.g. for images or content to be shared around neighbouring schools) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from

The UK Safer Internet Centre at 0344 381 4772 and helpline@saferinternet.org.uk and the Internet Watch Foundation at <https://www.iwf.org.uk/>.

- 16.10 Sexual violence and sexual harassment can occur between two children of any age and gender and between children of the opposite or the same gender. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 16.11 Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. While it is important that **all** victims are taken seriously and offered appropriate support, staff are trained to be aware that 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.
- 16.12 This Policy largely refers to sexual violence and sexual harassment between pupils at the school. However, there may be occasions when pupils report sexual violence and/or harassment perpetrated by other young people who attend a different educational provision. In that situation, the DSL will liaise with the DSL at the alleged perpetrator's school as well as the victim's parents, the Police and Children's Social Care. Support for the victim will be provided as described below, irrespective of which educational provision the alleged perpetrator attends.

16.13 What is sexual violence and sexual harassment?

When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

- i. **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.
 - ii. **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
 - iii. **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
 - iv. **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 s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:
 - i. a child under the age of 13 can never consent to any sexual activity;
 - ii. the age of consent is 16;
 - iii. sexual intercourse without consent is rape.
- 16.14 **Sexual harassment** in the context of peer on peer behaviour is unwanted conduct of a sexual nature that can occur online and offline and may include sexual name-calling, taunting or "jokes" and physical behaviour, for example, deliberately brushing against someone or interfering with clothes. 'Upskirting' is also a criminal offence (under the Voyeurism (Offences) Act 2019) and typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, in order to obtain sexual gratification or to cause humiliation, distress or alarm (anyone of any gender can be a victim). Evidence shows that girls, children with SEND and LGBT children are more likely to be the victims of sexual violence and harassment and boys are more likely to be the perpetrators. However, sexual violence and sexual harassment can occur between children of any gender.

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.

Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment

and/or sexual violence.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. The school therefore recognises the importance of recognising the nature of, identifying and challenging sexual violence and sexual harassment in its wider approach to safeguarding and promoting the welfare of children; through policies and through the curriculum.

16.15 Minimising the risk of sexual violence and sexual harassment at the school/college through a planned curriculum

Planned PHSE and Relationships, Sex and Health Education will include personal privacy, respect and consent so that children will have a better understanding of how to behave towards their peers including online. This will be taught alongside other safeguarding issues as set out in the DfE statutory guidance "Relationships Education, Relationships and Sex Education (RSE) and Health Education". This will be appropriate to pupils' age and stage of development. It will also be underpinned by the school's behaviour policy and pastoral support system.

16.16 How the school will respond to reports of sexual violence and sexual harassment

The school will respond to reports in accordance with Part 5 of the current version of *Keeping Children Safe in Education*. Schools may also find it useful to refer to the peer on peer abuse toolkit available at <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/farrer--co-safeguarding-peer-on-peer-abuse-toolkit-2019.pdf>.

It is not possible to anticipate every particular set of circumstances and therefore what the school's response will be to every case. This policy sets out a set of principles which the school will consider in responding on a case by case basis.

All responses to reports of sexual violence will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using her/his professional judgement and supported by other agencies, such as Children's Social Care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

Support will be offered to both the alleged victim(s) and child(ren) accused. Parents will be included in discussions about the format that this support will take.

16.17 Risk assessment

The risk and needs assessment will consider:

- i. the victim, especially their protection and support;
- ii. the alleged perpetrator/s (if she/he/they attend the same school); and
- iii. all the other children (and, if appropriate, adult pupils and staff) at the school, especially any actions that are appropriate to protect them.

The DSL (or a deputy) should ensure they are engaging with Children's Social Care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The school's risk assessment should not replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's approach to supporting and protecting pupils and updating our own risk assessment.

16.18 Action following a report of sexual violence and/or sexual harassment - what to consider

The DSL (or deputy) is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead the school's initial response. Important considerations will include:

- i. the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. However, if the victim asks the school not to tell anyone about the sexual violence or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g. to

- protect the victim and other young people from harm and to promote the welfare of children;
- ii. the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- iii. the ages of the children involved;
- iv. the developmental stages of the children involved;
- v. any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- vi. if the alleged incident is a one-off or a sustained pattern of abuse;
- vii. whether there are ongoing risks to the victim, other children, adult pupils or school staff;
- viii. informing parents/carers (unless this would put the victim at greater risk);
- ix. only sharing information with those staff who need to know in order to support the children involved and/or be involved in any investigation. For instance, teachers may be asked to monitor the victim's welfare without needing to know that they are a victim of sexual violence or harassment.

16.19 Children sharing a classroom - initial considerations following a report of sexual violence

Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult for the victim and close proximity with the alleged perpetrator is likely to be especially distressing. Whilst the school establishes the facts of the case and starts the process of liaising with Children's Social Care and the Police, the alleged perpetrator will usually be removed from any classes they share with the victim. Consideration will also be given to how best to keep the victim and alleged perpetrator a reasonable distance apart on school premises and on transport to and from the school, where appropriate. These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and transport, will be considered immediately.

In all cases, the wishes of the victim, the nature of the allegations and the protection of all children in the school or will be especially important when considering any immediate actions.

16.20 Responding to the report

If an offence has been committed, the Police will be informed. It is the prerogative of parents and victims to make complaints to the Police directly but the school will also speak to the Police in order to ensure effective action is taken to safeguard other young people as well as the victim.

If a child has suffered significant harm, a referral will be made to Children's Social Care via the Local Authority Social Care Team in order to ensure that the needs of both the victim and perpetrator are the subject of professional risk assessments by social workers. Similarly, any instance of sexual activity between pupils on the school site will always be referred to Children's Social Care.

Responses to **all** incidents of both sexual violence and sexual harassment will be underpinned by the principles of:

- i. zero tolerance of sexual violence and sexual harassment;
- ii. support for both the victim and alleged perpetrator/s, particularly pending the outcome of investigations
- iii. all parties have an ongoing right to an education and are safest if they remain in school subject to appropriate risk assessments and risk management.
- iv. exclusion will be avoided unless that is the only realistic option to keep one or more parties safe.

In principle, there are four possible responses to an allegation or concern about sexual violence or harassment on the part of a pupil/pupil:

1. Manage internally

In some cases of sexual harassment, e.g. one-off incidents, the school may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour policy and anti-bullying procedures, speaking to the child and her/his parents, making expectations of future behaviour clear (in writing where appropriate) and by providing pastoral support. Careful consideration will be given to the need to separate the victim and alleged perpetrator/s in lessons (as with sexual assaults) pending investigation.

2. Early Help

The school may decide that the child/ren involved do not require statutory interventions but may benefit from early help, which can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

A safeguarding record will be maintained of all concerns, discussions, decisions and reasons for decisions for all responses as in 1. and 2.

17. Domestic Abuse

17.1 Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- i. psychological;
- ii. physical;
- iii. sexual;
- iv. financial; and
- v. emotional abuse.

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.

17.2 Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

17.3 All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

18. Homelessness

18.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) refer any concerns to 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.

18.2 In most cases school and college 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 that 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 (or a deputy) will ensure appropriate referrals are made based on the child's circumstances.

19. Youth Produced Sexual Imagery ('Sexting')

- 19.1 The school will act in accordance with advice endorsed by DfE '*Sexting in schools and colleges: responding to incidents and safeguarding young people*' (UK Council for Child Internet Safety 2017): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf
- 19.2 All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved.
- 19.3 Young people who share sexual imagery of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily. The school will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.
- 19.4 All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to YPSI is serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.
- 19.5 If staff become concerned about a YPSI issue in relation to a device in the possession of a pupil (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (i.e. it should be confiscated). This is consistent with DfE advice *Searching, Screening and Confiscation - Advice for headteachers, school staff and governing bodies (DfE 2018)*, page 11 'After the search'.
- 19.6 Staff will not look at or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).
- 19.7 The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- 19.8 If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Children's Social Care and/or the Police immediately.
- 19.9 The Police will always be informed when there is reason to believe that indecent images involve sexual acts and/or any child in the imagery is under 13 years of age.
- 19.10 The DSL will make a judgement about whether a reported YPSI incident is 'experimental' as in section 12 above or 'aggravated'.
- 19.11 Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement; criminal or abusive behaviour by young people such as sexual abuse, extortion or threats; malicious conduct arising from personal conflicts; coercion; an imbalance of power, e.g. an older pupil pressurising a younger or vulnerable pupil to create and share an indecent image; or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured.
- 19.12 Aggravated incidents of sexting will usually be referred to Local Authority Social Care (MASH in Warwickshire) for advice about whether or not a response by the Police and/or Children's Social Care is required. This will facilitate consideration of whether:
 - i. there are any offences that warrant a Police investigation
 - ii. child protection procedures need to be invoked
 - iii. parents/carers require support in order to safeguard their children

- iv. a Multi-Agency Child Exploitation (MACE) meeting is required
- v. any of the perpetrators and/or victims require additional support. This may require the initiation of a CAF and the offer of early help services

19.13 Examples of aggravated incidents include:

- i. evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim)
- ii. evidence of coercing, intimidating, bullying, threatening and/or extortion of pupils by one or more other pupils to create and share indecent images of themselves
- iii. pressure applied to several pupils (e.g. all female pupils in a class or year group) to create and share indecent images of themselves
- iv. pressurising a pupil who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves
- v. dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)
- vi. what is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
- vii. sharing of indecent images places a young person is at immediate risk of harm, for example the young person is presenting as suicidal or self-harming

19.14 The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident; or whether the school is able to contain the situation in partnership with all parents of the pupils involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will usually consult with the Police and/or Children's Social Care to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

19.15 **Viewing the imagery** - adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil. If a decision is made to view potentially indecent images, the DSL will be satisfied that viewing:

- i. Is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved).
- ii. Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report.
- iii. Is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

If it is necessary to view the imagery, then the DSL will:

- i. Discuss and agree the decision to do so beforehand with the Principals or Children's Social Care.
- ii. Ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the Principals .
- iii. Ensure viewing takes place with another member of staff present in the room, ideally the Principals, another DSL or a member of the senior leadership team. The other staff member

does not need to view the images.

- iv. wherever possible ensure viewing takes place on school premises, ideally in the Principals or DSL's office.
- v. Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- vi. Record the viewing of the imagery in the pupil's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

19.16 **Deletion of images** - if the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

20. Serious Violence

- 20.1 All staff are made aware of indicators that children are at risk from or are involved with serious violent crime; and are trained to record and report any concern about children at risk of or involved in perpetrating serious violence as with any other safeguarding concern.
- 20.2 Indicators may include increased absence, 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 could also indicate that children have been approached by or are involved with individuals associated with criminal gangs and/or criminal exploitation.
- 20.3 **Staff will be made aware of these and of the other risk factors which increase the likelihood of involvement in serious violence, including, 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.**
- 20.4 **Staff training will raise awareness to these risks and any concerns will be passed to the Designated Safeguarding Lead to co-ordinate a safeguarding response.**

21. Contextual Safeguarding

- 21.1 Safeguarding incidents and/or behaviours can be associated with factors both outside children's home environments and outside school; and/or can occur between children outside the school. The DSL, deputy DSLs and all staff will consider the context within which such incidents and/or behaviours occur.
- 21.2 Contextual safeguarding means that assessments of children should consider wider environmental factors present in a child's life that are a threat to their safety and/or welfare. Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and will share intelligence with the Police in order to prevent children suffering harm.
- 21.3 The school will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Social Care, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse.

22. Child Sexual Exploitation and Child Criminal Exploitation

- 22.1 **Child sexual exploitation (CSE)** is a form of child sexual abuse. **Child criminal exploitation (CCE)** is a form of child abuse. Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity:
 - i. in exchange for something the victim needs or wants; and/or

- ii. for the financial advantage or increased status of the perpetrator or facilitator; and/or
 - iii. through violence or the threat of violence.
- 22.2 The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur through the use of technology.
- 22.3 CSE and CCE can affect any child or young person, female or male, under the age of 18 years, including 16 and 17-year olds who can legally give consent to have sex.
- 22.4 Sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they may have created and posted on social media).
- 22.5 CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health.
- 22.6 It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.
- 22.7 Criminal exploitation of children can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.
- 22.8 Children and young people are often unwittingly drawn into sexual and/or criminal exploitation through the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation.
- 22.9 Child criminal exploitation may include activities such as:
- i. a child travelling outside the area in which she/he lives in order to transport, distribute or sell drugs or money for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as **county lines** (see below);
 - ii. a child committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived or manipulated;
 - iii. a child being forced to shoplift or pickpocket;
 - iv. a child being forced to threaten other young people;
 - v. a child being forced to work in a cannabis factory;
 - vi. a child being forced to commit crime in order to settle actual or fabricated debts;
 - vii. gang membership, which may lead to the child being exploited to do something illegal or dangerous in return for kudos/status in the gang;
 - viii. a child being encouraged or manipulated to commit crime via social media;
 - ix. a child receiving food, money, kudos or status in return for storing a weapon or drugs for others.
- 22.10 All staff are trained to be vigilant about and report indicators of CSE and CCE including:
- i. children appearing with money, clothes, mobile phones, etc. without plausible explanation;
 - ii. children who associate with other young people involved in exploitation;
 - iii. children in relationships with controlling or significantly older individuals or groups;
 - iv. children frequenting areas known for sex work and/or criminal activity;
 - v. children who associate with gangs and/or become isolated from their peers/social networks;
 - vi. children receiving excessive texts/phone calls;
 - vii. multiple callers (unknown adults or peers) to children;

- viii. concerning use of internet or other social media by children;
 - ix. increasing secretiveness around children's behaviours;
 - x. children presenting inappropriate sexualised behaviour for their age and/or with sexually transmitted infections and/or becoming pregnant;
 - xi. children self-harming or presenting with significant changes in their emotional well-being;
 - xii. children who misuse drugs and alcohol;
 - xiii. children who go missing for periods of time or regularly come home late;
 - xiv. children who regularly miss school or education, have unexplained absences or do not take part in education;
 - xv. children being exposed to or perpetrating serious levels of violence; and/or being manipulated or forced into excessive violence towards others by somebody who is exploiting them (for further information see :
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf);
 - xvi. evidence of/suspicions of children suffering physical or sexual assault.
- 22.11 Although the following vulnerabilities increase the risk of child sexual and/or criminal exploitation, not all children with these indicators will be exploited and child sexual and criminal exploitation can occur without any of these issues:
- i. having a prior experience of neglect, physical and/or sexual abuse;
 - ii. lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
 - iii. recent bereavement or loss;
 - iv. social isolation or social difficulties;
 - v. absence of a safe environment to explore sexuality;
 - vi. economic vulnerability;
 - vii. homelessness or insecure accommodation status;
 - viii. connections with other children and young people who are being sexually and/or criminally exploited;
 - ix. family members or other connections involved in adult sex work and/or other criminal activity;
 - x. having a physical or learning disability;
 - xi. being looked after (particularly those in residential care and those with interrupted care histories);
 - xii. issues/anxieties about sexual identity.
- 22.12 The school teaches children about consent and the risks of sexual and criminal exploitation in the PSHE and SRE curriculum. A common feature of sexual and criminal exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.
- 22.13 All staff are trained to report all concerns about CSE and CCE to the DSL immediately. The DSL will consider the need to make a referral to Children's Social Care
- 22.14 Following a referral to Children's Social Care, a Multi-Agency Child Exploitation (MACE) meeting may be convened. The school will attend and share information at MACE meetings as required. Parents and young people will be invited to attend MACE meetings by Children's Social Care as appropriate.

23. County Lines

- 23.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of “deal line”.
- 23.2 Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- 23.3 Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

For further information see:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf.

24. So-Called ‘Honour Based’ Abuse

- 24.1 So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include 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.
- 24.2 Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA.

All forms of so-called HBA are abuse (regardless of the motivation) and staff will record and report any concerns about a child who might be at risk of HBA to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police and/or Children’s Social Care as with any other child protection concern; and may also contact the Forced Marriage Unit on 020 7008 0151 or via email at fm@fco.gov.uk for advice as necessary.

24.3 Female Genital Mutilation

Female genital mutilation (FGM) is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress with long-lasting harmful consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff will be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both. (See <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines> for further information).

If staff have a concern that a girl may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern. The DSL will discuss the concern with Children’s Social Care with a view to making a referral and will inform the Police as appropriate.

Indications that FGM may already have taken place may include a child:

- i. having difficulty or looking uncomfortable when walking, sitting or standing;

- ii. spending longer than normal in the bathroom or toilet due to difficulties urinating;
- iii. spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- iv. having frequent urinary, menstrual or stomach problems;
- v. having prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- vi. being reluctant to undergo normal medical examinations;
- vii. confiding in a member of staff without being explicit about the problem due to embarrassment or fear;
- viii. talking about pain or discomfort between her legs.

Teachers are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g. by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. Information on when and how to make a report can be found at: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>.

Teachers in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police. A referral will also be made to Children's Social Care.

24.4. **Forced Marriage**

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

In a forced marriage situation, children may be married at a very young age, and well below the age of consent in England. School staff will be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under s.121 of the Anti-Social Behaviour, Crime and Policing Act 2014 – see <https://www.gov.uk/forced-marriage> for further information).

24.5 **Modern Slavery and Human Trafficking**

This can take on many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Children may be trafficked into the UK from abroad or moved around the country. Staff need to be aware of indicators which include, but not limited to, neglect, isolation, poor living conditions, having few personal belongings and a lack of trust and reluctance to seek help. Staff will refer any concerns to the DSL without delay who will take action and also refer victims to the National Referral Mechanism (www.gov.uk).

25. Protecting Children from Radicalisation and Extremism

- 25.1 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**.
- 25.2 Some children are vulnerable to extremist ideology and radicalisation. Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As such, the Designated Safeguarding Lead is responsible for the school's strategy for protecting children from those risks.

- 25.3 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to fundamental values, including 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. Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.
- 25.4 As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas. Young people who feel isolated or disaffected in some way are particularly vulnerable to radicalisation as they are other forms of abuse and exploitation.
- 25.5 The Trust has defined responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in school.
- 25.6 During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. The school is committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. The school promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within school.
- 25.7 School staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area; and a specific understanding of how to identify individual children who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern, identifying early indicators of possible radicalisation including changes in behaviour and attitudes to learning; and expressions of interest in extremist ideas along with a tolerance towards potential violence to certain members of society.
- 25.8 The school recognises the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. However, the DSL (or deputy) will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support.
- 25.9 Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.
- 25.10 As a Channel partner, the school may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support.
- 25.11 The school will discuss any concerns about possible radicalisation identified in school with a child's parents/carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk; and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation. Subject to consultation with the Police PREVENT team and in the interests of making proportionate responses, the school may offer support to children and their families through the provision of early help as appropriate.
- 25.12 The school expects all staff, volunteers, RAB Members, visiting practitioners, contractors and individuals or agencies that hire school premises to behave in accordance with the school's Staff Behaviour Policy (code of conduct), will challenge the expression and/or promotion of extremist views and ideas by any adult on school premises or at school events and, when necessary, will make appropriate referrals in respect of any such adult.

- 25.13 Parents and staff may find the website www.educateagainsthate.com informative and useful. The website is designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people and how best to support them. The website provides information on training resources for teachers, staff and school leaders.
- 25.14 As part of the school's overall safeguarding arrangements and ongoing action plan for improvement, the DSL will consider identified local issues; intelligence from pupils, parents, staff and partner agencies; and new information from national issues and learning to review practice and procedures in order to keep pupils safe.

26. Children Who Are Looked After, Were Previously Looked After Or Who Have A Social Worker

26.1 The most common reason for children becoming looked after is as a result of abuse or neglect. Children who were previously looked after potentially remain vulnerable. The school ensures that staff have the necessary skills and understanding to keep children who are looked after and children who were previously looked after safe and ensures that appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for children who are looked after and previously looked after and the DSL hold details of the social workers for all children who are looked after or were previously looked after; and the name and contact details of the Local Authority's virtual head for children who are looked after.

26.2 Children with a social worker

The school recognises that when a child has a social worker, that is an indicator that she/he may be more vulnerable to harm than other children as well as facing barriers to educational attainment in relation to attendance, learning, behaviour and poor mental health issues.

The school will take those issues and needs into account when making plans to support children who have a social worker.

26.3 Care leavers

Local authorities have ongoing responsibilities to young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. The DSL will have details of the local authority Personal Advisor appointed to guide and support all care leavers; and should liaise with them as necessary regarding any issues of concern affecting a care leaver.

27. Private Fostering Arrangements

27.1 A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (*under 18 if the child has a disability*) by someone **other than** a parent or close relative*, in their own home, with the intention that it should last for 28 days or more. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

*A close relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

27.2 On admission to the school, we will take steps to verify who has parental responsibility for the child and the relationship of the adults accompanying the child who is being registered.

27.3 Private fostering occurs in all cultures including British culture and a private fostering arrangement may start at any age.

- 27.4 Whilst most privately fostered children are appropriately supported, looked after and remain safe and well, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect; have been trafficked; are sexually or criminally exploited; or suffer modern-day slavery.
- 27.5 Parents and private foster carers both have a legal duty to inform Children's Social Care in the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.
- 27.4 Schools have a mandatory duty to report to Children's Social Care in the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. School staff should notify the designated safeguarding lead when they become aware of or suspect private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school will also fulfil its duty to inform the local authority of the private fostering arrangement.

Section 3 - Recruitment and Staff Training

1. Safer Recruitment

- 1.1 The Academy will have regard for '*Keeping Children Safe in Education (updated annually), Part three: Safer recruitment*' and ensure that all appropriate measures are applied in relation to everyone who works in the Academy, who is likely to be perceived by a student as a safe and trustworthy adult including temporary staff, volunteers, RAB Members and Directors and staff employed by contractors.
- 1.2 To comply with safer recruitment practice all applicants will:
- i. complete an application form which includes their employment history;
 - ii. provide two referees, including at least one who can comment on the applicant's suitability to work with children;
 - iii. provide evidence of identity and qualifications;
 - iv. be checked in accordance with the Disclosure and Barring Service (DBS) regulations, as appropriate to their role;
 - v. provide evidence of their right to work in the UK, including relevant overseas checks;
 - vi. be interviewed by a panel of at least two school leaders/ RAB members;
 - vii. allow the Academy to verify the candidate's mental and physical fitness to carry out their work responsibilities.
- 1.3 The Academy will ensure that:
- i. at least one member of staff of each recruitment panel (or volunteer appointment process) will have attended safer recruitment training.
 - ii. all new members of staff and volunteers will undergo an induction that includes familiarisation with the Academy's Safeguarding / Child Protection Policy, Staff Code of Conduct, other issues as in section 16 of this Policy and identification of their child protection training needs.
 - iii. written confirmation is obtained from supply agencies, stating that they have satisfactorily undertaken all appropriate checks that the school would have undertaken if they were employing the individual directly.
 - iv. a single central record of completed recruitment checks, is maintained in accordance with section 3 of *Keeping Children Safe in Education*
 - v. Academies will check that an applicant for a management position is not the subject of a section 128 direction made by the secretary of state prohibiting or restricting her/him from taking part in the management of an independent school, Academy or free school.
 - vi. All RAB Members will be the subject of Enhanced DBS checks as defined in the current version

of Keeping Children Safe in Education.

- 1.4 In addition to obtaining the DBS certificate described, anyone who is appointed to carry out teaching work will require an additional check, carried out using the Employer Access Online Service, to ensure they are not prohibited from teaching.
- 1.5 For staff who work in childcare provision or who are directly concerned with the management of such provision, the Academy will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009.
- 1.6 Volunteers will undergo checks commensurate with their work in the school and contact with students. All RAB members and Directors will undertake DBS checks and other appropriate checks in line with all other adults.
- 1.7 Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safer recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance.
- 1.8 The Academy will check the identity of all contractors working on site and request DBS checks where appropriate.

2. Staff Training

- 2.1 The DSL will attend training for newly appointed DSLs and refresher training every two years delivered by the relevant County Council's Education Safeguarding Service. The DSL will also be supported to access inter-agency training as part of their continuing professional development.
- 2.2 The Principal, Vice Principal, Assistant Principal Workforce Development, Business Manager and at least one RAB member will attend safer recruitment training.
- 2.3 All staff (including temporary staff, volunteers, RAB members who will have direct contact with students) will receive an explanation during their induction which will include:
 - i. the Safeguarding and Child Protection Policy, including county-specific procedures as outlined in the model policy;
 - ii. signs and symptoms of abuse and neglect;
 - iii. responding to disclosure of abuse or neglect by a child;
 - iv. reporting and recording arrangements;
 - v. the staff Code of Conduct;
 - vi. details of the DSL.
- 2.4 The induction will take place **before** a new member of staff, RAB Member or volunteer has direct contact with students in the Academy.
- 2.5 The Academy's Safeguarding and Child Protection Policy and Staff Code of Conduct will be sent with the letter confirming an appointment with a written requirement that the individual has read the two documents in advance of starting work at the Academy. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them.
- 2.6 All staff, including the Principal, volunteers and Safeguarding Link RAB Member will receive appropriate and regularly updated safeguarding and child protection training and thematic updates as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance and any requirements of the relevant local safeguarding board
- 2.7 In addition, the principal (and/or other school leaders as appropriate) and at least one RAB member (usually the chair) will attend safer recruitment training and the school will ensure that there are at least two school leaders and/or RAB members that have attended safer recruitment training within the past three years.

- 2.8 Staff should be trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff, as they do with any other safeguarding concern.
- 2.9 All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, extremism, female genital mutilation and forced marriage.

Section 4 - Partnership Working, Record Keeping and Information Sharing

1. Record Keeping

- 1.1 In relation to maintaining safeguarding (including early help) and child protection records, the Academy will:
 - i. keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately;
 - ii. keep records in a folder in a meticulous chronological order;
 - iii. ensure all records are kept securely and independently from the student's school records in locked locations;
 - iv. when a student moves, ensure all relevant child protection records are sent separate from the general student files and directly to the Designated Safeguarding Lead of the receiving school, college or other education establishment.
- 1.2 Child protection information will be stored and handled in line with General Data Protection regulation principles.
- 1.3 The General Data Protection Regulations do not prevent Academy staff from sharing information with relevant agencies, where that information may help to protect a child.

2. Confidentiality and Information Sharing

- 2.1 All staff will ensure that child protection issues retain a high level of confidentiality, not only out of respect for the student family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.
- 2.2 Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, another SLT member or outside agency, as required.
- 2.3 It is reasonable for staff to discuss day-to-day concerns about students with colleagues in order to ensure that children's general needs are met in school. However, staff should only refer child protection concerns to the DSL or the Principal or – in the case of concerns about the Principal – to the CEO of the MAT Board. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. **However, the statutory guidance in the current version of 'Keeping Children Safe in Education' emphasises that any member of staff can contact and/or make a referral to Children's Social Care if they are concerned about the safety of a child.**
- 2.4 Staff have a professional responsibility to share information with other agencies in order to safeguard children.
- 2.5 Staff, parents, RAB members and Directors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation of abuse is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

3. Student / Parental Access to Child Protection Information

- 3.1 Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that students and parents do not have an automatic right to see them.
- 3.2 Any student or parent wanting to see child protection records, will need to make the request to the Principal, who will advise them to submit a Subject Access to Information request for consideration.

4. Complaints Procedure

- 4.1 The Trust's complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying or belittling a student or discriminating against them in some way. Complaints are managed by the Principal, other members of the Senior Leadership Team and RAB Members.
- 4.2 Complaints from staff are dealt with under the Academy's Complaints and Disciplinary and Grievance Procedures.

Appendix 1

Statutory Organisation Contact Details

Children's Social Care Referrals / Emergency Contacts / Referral Forms:

- **Warwickshire**

<https://www.warwickshire.gov.uk/childprotection>

Multi Agency Safeguarding Hub referral form

<http://apps.warwickshire.gov.uk/api/documents/WCCC-1167-5>

- **Leicestershire**

<http://lrsb.org.uk/childreport>

Police Child Protection Referrals:

- Warwickshire / Leicestershire - 101

Local Authority Designated Officer (LADO):

- Warwickshire 01926 742 526 lado@warwickshire.gov.uk
- Leicestershire 0116 305 7597 / 0116 305 8161

Children Missing in Education Service (CME):

- Warwickshire 01926 736 323
- Leicestershire 0116 305 2071

Local authority safeguarding / child protection procedures:

- Warwickshire <https://www.safeguardingwarwickshire.co.uk/>
- Leicestershire <http://lrsb.proceduresonline.com/index.htm>



Safeguarding Team

				
Mrs H Zakary Principal Staff Safeguarding	Mrs D Stanton Vice Principal Lead DSL	Miss A Ruston Safeguarding Officer	Mrs S Sharkey School Counsellor	Miss L Hayward Assistant Principal
				
Tim Render Link Safeguarding Governor	Miss L Taylor Vice Principal	Mr R Stevenson SENCD	Mr C Bonny- Meekings Assistant Principal	Mrs M Adams Business Manager
				
Mrs C Bagshaw Pastoral Lead	Miss H Key Pastoral Lead	Mrs J Glendinning Pastoral Lead		

The George Eliot School is committed to the safeguarding of all students. Talk to a member of the safeguarding team immediately if you have any concerns or worries about the safety or welfare of a young person. Safeguarding is everyone's responsibility.
Safeguarding is the responsibility of ALL staff. Students can speak to any member of staff. Staff have a duty to inform a DSL of any potential safeguarding issues.
June 2021



SAFEGUARDING

Reporting an Incident

If you have concerns about a possible risk of harm to a child, please inform one of the members of staff below and/or record on CPOMS.

Dr L Newman
Principal



Mr A Ward
Vice Principal
Designated Safeguarding
Lead



Mrs K Simpson
Safeguarding Officer
Deputy Designated
Safeguarding Lead



Mr P Nealon
Vice Principal
Deputy Designated
Safeguarding Lead



Mr A Hussain
Vice
Principal



Mrs S Behan
Assistant
Principal



Mrs C Smith
Assistant
Principal



Mrs N Hepburn
Attendance
Officer



Mr Innes
Year 7



Miss Robinson
Year 8



Miss Merrigan
Year 9



Mrs Gittings
Year 10



Mr Whetton
Year 11



Miss Somers



Mrs Hartman



Miss A Sheikh



Mrs S Sheikh



**Get help - don't keep it a secret
talk to someone that can help
pleasehelpHHS@midlandat.co.uk**

Teen Dating Violence Occurs Different Ways

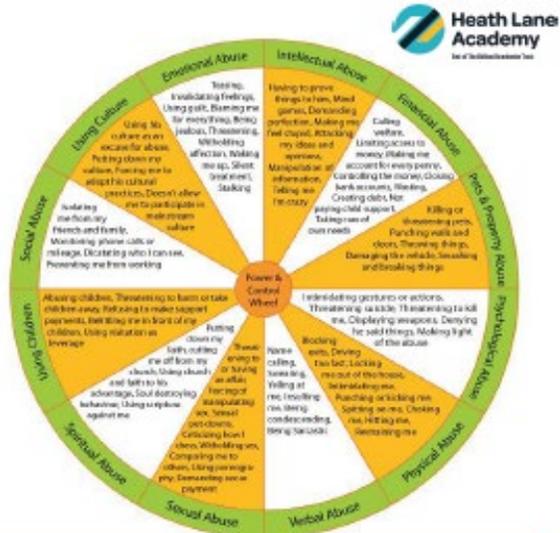
- 1 Physical**
Pinching, hitting, shoving, or kicking.
- 2 Emotional**
Threatening, name calling, or harming a partner's self-worth.
- 3 Sexual**
Forcing a partner in a sex act when he or she does not or cannot consent.
- 4 Stalking**
Pattern of unwanted harassing or threatening tactics that cause fear.

Adolescence is ideal for promoting healthy relationships and preventing patterns of dating violence that can last into adulthood.

HOW MUCH DO YOU KNOW ABOUT ...

- HOW TO HAVE FUN
- HOW TO STAY IN CONTROL
- HOW TO REPORT

THINK UP KNOW
www.thinkupknow.org



Heath Lane Academy SAFEGUARDING TEAM

Part of The Midland Academies Trust



Mrs D Smith
Assistant Principal
Designated Senior Leader for Safeguarding



Ms J Wheeler
Safeguarding Officer
Deputy Designated Safeguarding Lead



Ms K Dorman
Pastoral Leader



Ms M Parkin
Pastoral Leader



Miss A Buff
Pastoral Leader

If you have any worries or concerns, speak to one of the Designated Safeguarding Team in school.



Don't get over worried to what to do when...
Don't sleep on the sofa...
I should be happier...
What if he says...
Don't talk yourself out of it. Talk to us.

NSPCC HELPLINE
0800 080 5000
www.nspcc.org.uk

ChildLine
0800 1111

CLICK CEOP
Internet Safety

Safeguarding against **EXTREMISM** is NOT saying!

H

We need YOUR help!

If you have concerns about someone that you feel may be exposed to violent extremism, speak to your safeguarding coordinator.

Reporting concerns is not spying...

Dealing with BULLYING!

- Report to...
- Stay calm and to control.
- Don't show emotions like anger, fear and being upset.
- Be assertive — speak clearly and firmly.
- Talk to trusted friends and ask them for help.
- Show confidence — use positive body language.
- Try a strategy that may work for you:
- Tell the bully you can't live what he or she is doing.
- Ask the bully to stop what he or she is doing.
- Try to make more friends by getting involved in other activities.
- Try to avoid the bully.
- Try to ignore the bully.

STAY SAFE @



Help us to keep you safe! If you see someone not wearing a lanyard/Visitor Badge please report it to the nearest member of staff immediately.



If you have any concerns about the safety of anyone at the Nuneaton Academy, in their home or anywhere else in the community, then please speak to any member of staff. The people shown below are trained Safeguarding Leads. **NOTICE THINGS - BE VIGILANT**

 Mrs L Hall Principal	 Mr S Trout Acting Assistant Principal (DSL)	 Mrs K Thompson Safeguarding Officer (Deputy DSL)	 Ms H Robinson Vice Principal
 Mr P Kruse Vice Principal	 Mr J Newton Assistant Principal	 Mrs C Barnes Assistant Principal	 Miss C Alexander SENCO
 Miss S Miller Student Support Manager	 Mrs A Ferris Pastoral	 Mrs L Blackburn Pastoral	 Miss M Finnegan Pastoral
 Miss A Green Pastoral	 Mr J Harpin Pastoral	 Mr A Brown Pastoral	 Miss D Hemmings Progress Coach
 Mrs A Bagum Attendance Officer	 Mrs N Baskett Family Engagement Officer		

Safeguarding Administrators

 Mrs J Hancock	 Mrs A Hoar
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Updated: 26th April 2021

The Nuneaton Academy is committed to ensuring that students reach their full potential and enjoy the learning experience. As part of this commitment we offer the following services:

- Chaplaincy - Support for young people and staff through Stephen Blyth, Academy Chaplain
- Counselling Service
- Careers Advice - Appointments available
- Pastoral Leaders for each house, who can signpost young people to a range of support services.
- Other services such as breakfast/lunch clubs, LGBTQ+ club will return in full capacity when allowed to following government advice

If you know someone in the Academy who needs some support, advice or guidance please do not hesitate to speak to any member of staff or go to one of the people pictured on this poster. Also, if someone says something to you that concerns you, make sure you tell an adult immediately and definitely before you leave school.

Help us to keep you safe!

STAYING SAFE ON THE INTERNET

Use Social Media Wisely

Always think of your personal safety first when using ICT or your mobile phone. Remember it is easy for anyone to lie about who they are online, so you can never really be sure about who you are talking to.

Anything you post or upload to the internet is there forever so be very careful what you put online.

The online world also exists in the real world!

Stay safe - be happy

IF YOU ARE BEING BULLIED

What can you do?

- Get help - don't keep it secret
- Avoid the bully
- Be with other people
- Violence is not the answer

SOMEONE IS BEING BULLIED

How can you help?

- Be a friend
- Listen
- Be a mediator
- Talk to someone who can help
- email the anti-bullying helpdesk

STAND UP SPEAK OUT

pleasehelpTNA@midlandat.co.uk

Appendix 6

Signs and Symptoms

Physical Abuse - Physical Observations

- Bruising on trunk
- Bruising on face, upper arms, shoulders consistent with gripping
- Fingertip bruising/finger marks
- Burns and scalds especially cigarette burns or burning from excessive exposure to heat
- Human bite marks
- Fractures especially spinal
- Swelling and a lack of normal use of limbs
- Any serious injury with no explanation or conflicting explanations/inconsistent accounts
- Untreated injuries

Physical Abuse - Behavioural Observations

- Unusually fearful with adults
- Unnaturally compliant to parents/carers
- Refusal to discuss injuries/fear of medical help
- Withdrawal from physical contact
- Aggression towards others
- Wears cover up clothing
- Any behaviours that you would not expect to see in a child, at their age or stage of development

Neglect - Physical Observation

- Poor personal hygiene
- Poor state of clothing
- Poor growth pattern
- Emacipation, pot belly, short stature Poor skin and hair tones
- Untreated medical problems Non-organic failure to thrive

Neglect - Behavioural Observation

- Constant hunger
- Constant tiredness
- Frequent lateness or non-attendance at school Arrive early/leave late from school
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging
- Destructive tendencies

Sexual Abuse - Behavioural Observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour in young children
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity, and about secrets they cannot tell
- Inexplicable falling off in school performance
- Sudden changes to personality
- Lack of concentration, restlessness, aimlessness
- Socially withdrawn
- Overly compliant
- Acting out, aggressive behaviour
- Poor trust in significant adults
- Regressive behaviour, onset of wetting, by day or night

Appendix 6

- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, erratic school attendance Running away
- Substance, alcohol misuse
- Suicide attempts, self-mutilation, self-disgust
- Eating disorders, hysteria attacks in adolescents
- Severe sleep disturbance
- Low self-esteem, self-image

Sexual Abuse - Observations Specific to Sexual Exploitation

- Changes in peer group
- Unexplained wealth/goods
- Drug habit without any obvious ways of sustaining it
- Those who return from being missing, but looking well cared for
- Repeatedly associating with unknown men who are outside the family's contact. This could be by mobile phone, e-mail or post
- Dressing in an unexpected manner
- Mixing with others you suspect are being sexually exploited
- Reports that children have been seen in places to be used for prostitution
- Having keys to a property without any plausible explanation

Potential Causes of Emotional Abuse

- Abuse from community
- Individual from carers
- Witnessing domestic violence
- Racism
- Bullying
- From being subjected to one of the other three forms of abuse

Emotional Abuse - Indicators

- Inappropriate emotional responses to painful situations
- Neurotic behaviour (hair twisting, thumb sucking, rocking) Fear of new situations
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Being the scapegoat in the family
- Coldness/hostility

Appendix

Appendix 7 CPOMS User Guide

Internal Document - available to staff only.