



# Safeguarding and Child Protection Policy

## Endeavour Learning Trust

September 2023



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## Contents

<b>DEFINITIONS .....</b>	<b>7</b>
<b>1. LEGAL FRAMEWORK.....</b>	<b>8</b>
<b>2. ROLES AND RESPONSIBILITIES .....</b>	<b>10</b>
<b>3. SEXUAL HARASSMENT AND CHILD-ON-CHILD ABUSE .....</b>	<b>15</b>
<b>4. MULTI-AGENCY WORKING.....</b>	<b>17</b>
<b>5. EARLY HELP .....</b>	<b>17</b>
<b>6. ABUSE AND NEGLECT .....</b>	<b>19</b>
<b>7. DOMESTIC ABUSE.....</b>	<b>20</b>
<b>8. HOMELESSNESS.....</b>	<b>21</b>
<b>9. CHILDREN ABSENT FROM SCHOOL .....</b>	<b>21</b>
<b>10. CHILDREN ATTENDING AN APPROVED EDUCATIONAL ACTIVITY .....</b>	<b>21</b>
<b>11. CHILD EXPLOITATION (CE) .....</b>	<b>22</b>
<b>12. CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS .....</b>	<b>24</b>
<b>13. MODERN SLAVERY .....</b>	<b>24</b>
<b>14. FGM .....</b>	<b>24</b>
<b>15. FORCED MARRIAGE.....</b>	<b>25</b>
<b>16. RADICALISATION .....</b>	<b>25</b>
<b>17. MENTAL HEALTH .....</b>	<b>26</b>
<b>18. PRIVATE FOSTERING.....</b>	<b>27</b>
<b>19. PUPILS WITH FAMILY MEMBERS IN PRISON .....</b>	<b>27</b>
<b>20. SERIOUS VIOLENCE.....</b>	<b>27</b>
<b>21. CONSENSUAL AND NON-CONSENSUAL SHARING OF INDECENT IMAGES AND VIDEOS .....</b>	<b>28</b>
<b>22. CONTEXT OF SAFEGUARDING INCIDENTS .....</b>	<b>28</b>
<b>23. ALTERNATIVE PROVISION.....</b>	<b>29</b>
<b>24. WORK EXPERIENCE.....</b>	<b>29</b>
<b>25. PUPILS POTENTIALLY AT GREATER RISK OF HARM .....</b>	<b>29</b>
<b>26. ADVERSE CHILDHOOD EXPERIENCES AND TRAUMA .....</b>	<b>31</b>
<b>27. USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES.....</b>	<b>31</b>
<b>28. CONCERNS ABOUT PUPILS .....</b>	<b>32</b>
<b>29. MANAGING REFERRALS.....</b>	<b>32</b>
<b>30. ONLINE SAFETY .....</b>	<b>33</b>
<b>31. CONCERNS ABOUT STAFF AND SAFEGUARDING PRACTICES .....</b>	<b>34</b>
<b>32. ALLEGATIONS OF ABUSE AGAINST STAFF .....</b>	<b>34</b>
<b>33. COMMUNICATION AND CONFIDENTIALITY .....</b>	<b>36</b>
<b>34. SAFER RECRUITMENT .....</b>	<b>37</b>

# Whole School Safeguarding and Child Protection Policy

<b>35.</b>	<b>MONITORING AND REVIEW .....</b>	<b>38</b>
	<b>KEY CONTACTS AND TRAINING .....</b>	<b>38</b>

# Whole School Safeguarding and Child Protection Policy

## **Endeavour Learning Trust - Statement of intent**

Endeavour Learning Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of our schools' premises. We implement a trust-wide preventative approach to safeguarding, ensuring that the wellbeing of pupils is at the forefront of all action taken.

Where schools have pupils attending a sixth form provision who are over the age of 18, the trust acknowledges that adult safeguarding procedures apply and will act in the best interest of the pupil, in line with their wishes and along with local safeguarding adult procedures.

The trust does not tolerate any form of bullying, including sexual harassment and violence.

This policy has been created to outline a clear framework relating to any aspects of safeguarding within the trust and should be followed by:

- All members of staff.
- Any volunteers or trainee members of staff.
- All schools within the trust.
- All Local Academy Councillors, Governors and Trustees.
- The trust as a whole, including Executive and Central staff.
- Any associate members of the board of trustees and/or its committees.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that Trustees/Governors and Local Academy Councillors, Central Team staff, Headteachers and all staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to an appropriately trained person, e.g. the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) within their school and to escalate concerns in the best interest of children, if needed.
- Ensuring pupils are taught how to keep safe and recognise behaviour that is unacceptable and feel confident in knowing how to report concerns, where able.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, exploitation and radicalisation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that headteachers and any new staff and volunteers within the trust are only appointed when all the appropriate checks have been satisfactorily completed.

Should you wish to raise a complaint in regards to safeguarding practice of any Endeavour Learning Trust School or member of staff, please access [Endeavour Learning Trust Complaints Procedure](#).

# Whole School Safeguarding and Child Protection Policy

Endeavour Learning Trust ensures that safeguarding is prioritised through the strategic oversight of the Central Team, providing ongoing regular input into all aspects of safeguarding, strengthening practice in schools across the Trust to maintain safe environments where children can learn and thrive.

**Endeavour Learning Trust Designated Safeguarding Lead is:**

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# Whole School Safeguarding and Child Protection Policy

## **School Context and rationale:**

Burscough Priory Academy is a Secondary School school based in the area of Lancashire. Whereas we recognise that any safeguarding issue can occur in a child's life, there are some safeguarding concerns that are more prevalent than others within our setting. These are domestic abuse, alcohol/drug misuse, the impact of parental mental health and children's mental health. Burscough Priory Academy recognises that experiencing these issues can mean children could be more vulnerable to experiencing abuse and neglect and contextual risks such as child exploitation.

Burscough Priory Academy recognises the benefit of Early Help and providing support for children and families as soon as a problem emerges at any stage in a child's life. We offer this support in line with Lancashire's Continuum of Need. Our single agency response includes support through our pastoral structures and trained Designated Safeguarding Leads. Where more complex needs arise the process for joint agency support will be followed through referral to the Local Authority Early Help Service as well as other relevant local and national agencies providing support.

Where there is reasonable cause to suspect a child is at risk of or has experienced significant harm, the school will follow the procedures set out by our local Safeguarding Children Partnership arrangements and statutory guidance.

Lancashire Child Safeguarding Assurance Partnership: [www.safeguardingpartnership.org.uk](http://www.safeguardingpartnership.org.uk)

Burscough Priory Academy ensures that all staff and volunteers receive annual training on safeguarding as well as regular updates as part of an annual plan for the ongoing development of staff expertise around specific safeguarding issues.

Children are taught about safeguarding through the PSHE curriculum regularly as part of our responsibility to equip them with skills to recognise abuse, remain safe online and know how to report their concerns. We recognise this is vitally important in our preventative approach to keeping all children in school safe.

# Whole School Safeguarding and Child Protection Policy

## Definitions

The terms **“children”** and **“child”** refer to anyone under the age of 18.

For the purposes of this policy, **“safeguarding and protecting the welfare of children”** is defined as:

- Protecting pupils from maltreatment.
- Preventing the impairment of pupils’ mental and physical health or development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to have the best outcomes.

For the purposes of this policy, **“consent”** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **“sexual violence”** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **“sexual harassment”** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:



# Whole School Safeguarding and Child Protection Policy

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
  - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
  - Sharing unwanted explicit content.
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **“upskirting”** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

## 1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

### Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers’ Appraisal) (England) Regulations 2012 (as amended)

# Whole School Safeguarding and Child Protection Policy

- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

## **Statutory guidance**

- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2022) 'Keeping children safe in education 2023'
- DfE (2018) 'Working Together to Safeguard Children'
- Home Office (2022) 'Domestic Abuse guidance'
- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2021) 'Academy trust handbook 2023'

## **Non-statutory guidance**

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Governance handbook'
- DfE (2017) 'Child sexual exploitation'
- DfE (2022) 'Recruit teachers from overseas'
- DfE (2022) 'Behaviour in schools'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'

# Whole School Safeguarding and Child Protection Policy

- DfE (2022) 'Working together to improve school attendance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'

## Policies and documents

This policy operates in conjunction with the following school-level and trust-wide policies:

- Anti-bullying Policy
- Data Protection Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Behaviour Policy
- Freedom of Information Policy
- Complaints Policy

## 2. Roles and responsibilities

The board of trustees is responsible for:

- Take **strategic leadership responsibility** for the school's safeguarding arrangements
- Ensure that the school **complies with its duties** under the above child protection and safeguarding legislation
- Ensure that all Governors/Trustees/Local Academy Councillors receive **appropriate safeguarding and child protection training** upon their induction and that this training is updated regularly
- Ensure that staff **read, understand and follow** relevant parts of KCSIE September 2023, and **at least**, part one and Annex B
- Ensure a **named Trustee takes leadership responsibility for safeguarding** arrangements and receives appropriate training in the management of safeguarding
- Attend **Prevent training** at least bi-annually
- In each school, appoint an appropriate member of staff from the SLT to the **role of DSL** and one or more deputy DSLs to provide support and ensure that they are trained to the same standard as the DSL ensuring that the roles are explicit in their job description(s).
- Ensure the provision of appropriate support, funding, training, resources, and time for the DSLs to carry out their role
- Support and monitor a **trust wide approach to safeguarding**; this includes ensuring that safeguarding and child protection are at the forefront and **ethos** remains consistently high in every school
- Ensure **systems are in place so that children to confidently report abuse**, knowing that their concerns will be treated seriously, and they can safely express their views

# Whole School Safeguarding and Child Protection Policy

and give feedback; these systems will be well-promoted, easily understood, and easily accessible. Ensure that the **voice of the child** is heard and acted upon.

- Ensure **effective and appropriate policies** and procedures are in place
- Make sure that **pupils are taught about safeguarding**, that **safeguarding is embedded within the curriculum**, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- Adhere to statutory responsibilities by conducting **pre-employment checks on staff** who work with children
- Ensure every school has **clear systems and processes in place for identifying possible mental health problems in pupils**, including clear routes to escalate concerns and clear referral and accountability systems
- Ensure that at least one person on any recruitment panel has undertaken **safer recruitment training**
- Ensure that **all staff receive relevant safeguarding and child protection training** updates, including online safety and expectations and responsibilities relating to filtering and monitoring systems e.g. emails, as required, but at least annually, including a thorough induction
- Ensure there are procedures in place to report low level concerns over any member of staff working in the Trust
- Ensure there are procedures in place to handle **allegations against staff**, supply staff, volunteers and contractors
- Confirm that there are **procedures in place to make a referral to the DBS** and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned
- Ensure that appropriate disciplinary procedures are in place, as well as **policies pertaining to the behaviour of pupils and staff**
- Ensure that **procedures are in place to eliminate unlawful discrimination**, harassment and victimisation, including those in relation to child-on-child abuse.
- In every school, appoint a **designated teacher to promote the educational achievement of CLA** and ensure that this person has undergone appropriate training
- Ensure that the **appropriate level of check** is completed on Governors/Trustees and Local Academy Councillors
- Create a culture where **staff are confident to challenge** senior leaders over any safeguarding concerns
- Ensure that online safety is an interrelated and running theme through all aspects of safeguarding and that **children are safe online** by ensuring that appropriate filters and monitoring systems are in place and regularly checked.

# Whole School Safeguarding and Child Protection Policy

- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future
- Ensure staff in school are aware of, and policies are personalised to reflect, an understanding of specific issues such as **child-on-child abuse** and safeguarding children with disabilities and special educational needs
- Partake and complete the **S175/175 audit tool** on a bi-annual basis (at least) as directed by the Local Authority
- Be aware of their obligations under the **Human Rights Act 1998**, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements
- Ensure that all practice and procedures operate with the best interests of the child at the centre with a **firm child centred approach**

All staff within the trust and its schools have a responsibility to:

- Consider, at all times, what is in the best interests of the pupils in the trust.
- Maintain an attitude of '**it could happen here**' where safeguarding is concerned.
- Create and maintain safe environments in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the trust's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and DDSL(s) within the relevant school.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSC, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSC and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL within the relevant school.
- Be aware of and understand the trust's procedure to follow in the event that a pupil confides they are being abused, exploited or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases.

# Whole School Safeguarding and Child Protection Policy

- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to their school's DSL or DDSL(s) if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.
- Understand the process for reporting concerns over professional adults.

The designated safeguarding trustee is responsible for:

- Liaising with the board of trustees on an agreed basis with regards to safeguarding matters.
- Undertaking any responsibilities delegated to them by the board of trustees.
- Liaising with the Senior Safeguarding Lead for the trust and Local Academy Councillors for each school on an agreed basis regarding safeguarding matters.
- Taking leadership responsibility for safeguarding arrangements within the trust.
- Ensuring that accurate and effective recordkeeping of concerns and incidents is in place.
- Ensure that online safety, including filtering and monitoring systems, run as an interrelated and running theme throughout the whole Trust safeguarding approach, including in each school.

All teachers within the trust, including headteachers, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Report, by law, any instances of FGM to the police.
- Adhere to the guidance that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.

Headteachers in each school throughout the trust have a duty to:

- Ensure that the policies and procedures adopted by the trust, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff within their school with the appropriate policies and information upon induction.
- Work directly with the DSL to ensure safeguarding duties are fulfilled in the school
- Liaise with the Senior Safeguarding Lead regarding safeguarding practice within the school.

DSLs have a duty to:

# Whole School Safeguarding and Child Protection Policy

- Take lead responsibility for safeguarding and child protection within their school, including online safety and understanding the filtering and monitoring systems and processes in place, in line with annex C in Keeping Children Safe in Education 2022.
- Raise the profile of safeguarding in their school, including the impact of trauma on children.
- Ensure all staff receive appropriate training at induction, including online safety and expectations and responsibilities relating to filtering and monitoring, and that this is updated regularly, at least annually.
- Report on an agreed basis to the board of trustees via the agreed route of communication.
- Refer cases:
  - To Children's Social Care (CSC) where abuse and neglect are suspected, and support staff who make referrals CSC.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Ensure each member of staff within their school has access to and understands the trust-wide and individual school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the Central Team and board of trustees to ensure their school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Understand the importance of information sharing within the trust, including within school, with the trust's other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Adhere to any other school-level duties outlined in their school's policies and their job description.
- Adhere to any safeguarding arrangements specified in the trust's funding agreement.

The Senior Safeguarding Lead is responsible for:

- Work with trustees to provide strategic management of safeguarding and child protection, including online safety and filtering and monitoring systems, on behalf of the trust in line with policies, statutory guidance and best practice.
- Ensuring ongoing development of a strong safeguarding culture across the trust.
- Work closely with the LA to ensure local safeguarding arrangements are fully implemented and procedures followed.
- Providing support and consultation for DSLs and DDSLs with their safeguarding functions in each school.

# Whole School Safeguarding and Child Protection Policy

## 3. Sexual harassment and child-on-child abuse

The Trust will refer to the specific guidance in Keeping Children Safe in Education 2023 Part five: Child on Child Sexual Violence and Sexual Harassment.

Child on child abuse, including sexual violence and harassment, as defined above, will not be tolerated within the trust or any of its schools. Pupils across the trust's schools will be allowed an open forum to talk about concerns and sexual behaviour. They will be taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled. Reports of upskirting and sexual harassment will be managed by school in line with the Behaviour Policy and statutory guidance.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up".

The procedures for managing instances of child-on-child abuse is outlined in the Behaviour Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-Bullying Policy, where relevant.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.



# Whole School Safeguarding and Child Protection Policy

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will be made aware of the heightened vulnerability of pupils with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

The curriculum will ensure that pupils of all ages are taught about and understand the concept of consent and its importance in an age-appropriate way.

Schools and DSLs will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school or college staff
- contextual safeguarding issues.

**Following a report of sexual violence, the designated safeguarding lead (or deputy) will make an immediate risk and needs assessment, considering:**

- the victim
- the alleged perpetrator
- all other children (and if appropriate adult students and staff)
- Refer to guidance in Keeping Children Safe in Education Sept 2023, Part 5.

Risk assessments will be recorded and kept under review as a minimum termly. The DSL will ensure that the Risk Assessments are fulfilled and relevant staff are informed of the measures implemented to keep everyone safe.

DSLs in schools will be supported by the Senior Safeguarding Lead who is trained to use AIM checklists and Risk Assessment Management Plans.

# Whole School Safeguarding and Child Protection Policy

The DSL will work closely with other agencies where needed and ensure ongoing multi-agency work to support all parties involved.

## **4. Multi-agency working**

The trust contributes to multi-agency working as part of its statutory duty. The trust is aware of, and will follow, the local safeguarding arrangements.

The schools within the trust will be fully engaged, involved, and included in local safeguarding arrangements. Once the trust and its schools are named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. Schools within the trust will act in accordance with the trust's safeguarding arrangements.

The trust will work with Children's Social Care, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for intervention from statutory services is identified, the schools within the trust will allow access for CSC from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The trust also recognises the particular importance of inter-agency working in identifying and preventing Child Exploitation.

### **Information sharing**

The trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff within the trust will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members within the trust and its schools will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If school staff members are in doubt about sharing information, they will speak to their school's DSL or DDSL(s).

## **5. Early help**

# Whole School Safeguarding and Child Protection Policy

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

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse and/or neglect in other ways.

The DSL in each school will take the lead in decision making where early help is appropriate. Operational tasks including liaising with other agencies and setting up an inter-agency assessment may be delegated to a trained Deputy DSL where appropriate, with the oversight of the DSL. The local early help process will be followed as required.

All referrals to Early Help services can only be made with explicit consent from an adult with parental consent, or the child themselves where deemed to be able to give consent in line with age, development and competency. Where consent is not forthcoming, school will continue to work closely with the family in their best interests to support identified need.

The Senior Safeguarding Lead for ELT, with support of the board of trustees will collaborate with the relevant LA's and external agencies to engage with the local early help process.

Staff within the trust may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

All cases will be kept under constant review and consideration given to a referral to CSC for assessment for statutory services if the pupil's situation is not improving or is worsening.

# Whole School Safeguarding and Child Protection Policy

## 6. Abuse and neglect

**Abuse** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

**Physical abuse** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, biting, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child. Staff are aware of Female Genital Mutilation, a form of Physical abuse.

**Emotional abuse** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. **It may involve seeing or hearing the ill-treatment of another.** It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

**Sexual abuse** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

**Neglect** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate

# Whole School Safeguarding and Child Protection Policy

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

- ALL staff will be aware of the indicators of abuse and neglect and be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with contextual factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms.)
- ALL staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, radicalisation and the sharing of indecent images.
- ALL staff understand that children who perpetrate abuse or display harmful behaviour should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported - Risk Assessments will be undertaken where a child's behaviour poses a risk to others, themselves or the environment.
- ALL staff and volunteers understand that there are specific and emerging ways in which children can be abused and are aware of these specific issues, reporting any concerns, in the appropriate manner to the DSL. Specific issues include (but are not limited to):

## 7. Domestic abuse

In line with the Domestic Abuse Act 2021, **domestic abuse** is defined as abusive behaviour of a person towards another person where both are aged 16 or over and are personally connected. **Abusive behaviour** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

The school will recognise the serious, long lasting emotional impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

ELT has commitment to Operation Encompass and informing all stakeholders of the initiative.

The lead person for Operation Encompass for the trust is **Heather Fowler – Senior Safeguarding Lead**.

The Operation Encompass lead in this school is Mr J Thornberry, Pastoral Team Lead.

[www.operationencompass.org](http://www.operationencompass.org)

# Whole School Safeguarding and Child Protection Policy

## 8. Homelessness

The DSL and deputy DSLs in each school are aware of the contact details and referral routes into the Local Housing Authority so that concerns and support over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to” or frequent moves.

Referrals to the Local Housing Authority do not replace referrals to CSC where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSC will be made as necessary where concerns are raised.

## 9. Children absent from school

All trust staff will be aware a child being absent from school is a potential indicator of abuse or neglect and, as such, these pupils are particularly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, female genital mutilation or radicalisation. Staff will monitor pupils that are absent from school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, and in accordance with the Attendance Policy.

Each school will inform the LA of any pupil who fails to attend regularly or has been absent without the school’s permission for a continuous period of 10 school days or more, in accordance with LA protocol.

Where reasonably possible schools and colleges **will hold more than one emergency contact number for their pupils and students.**

## 10. Children attending an approved educational activity

An approved educational activity is where a pupil is attending another school at which they are registered or taking part in off-site activity such as field trips, educational visits, work experience or unregistered alternative provision.

Pupils can only be recorded as attending an off-site activity if it is approved by the school, of an educational nature and supervised by someone authorised by the school. Ultimately, school are responsible for the safeguarding and welfare of pupils taking part in an off-site educational activity so it would be reasonable to expect that the school would only authorise someone who was answerable to the school to supervise an activity. Such activities include:

- Dual registered at another school

# Whole School Safeguarding and Child Protection Policy

- Participating in a supervised sporting activity
- Educational visit or trip
- Work experience.

All relevant school policies continue to apply throughout any approved educational activity. Any activity which is approved will be risk assessed (where relevant) and school will ensure that attendance at any activity is monitored and robust communication is agreed with the provider/accompanying adults.

## 11. Child Exploitation (CE)

**Child Exploitation** is an umbrella term which covers the two commonly known types of exploitation, child criminal exploitation (CCE) and child sexual exploitation (CSE). The trust recognises that all forms of child exploitation are criminal. For the purposes of this policy we will define CCE and CSE.

**Child criminal exploitation** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence (this could be online or through technology)

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The trust recognises that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The trust also recognises that pupils of **any gender** are at risk of CCE.

Staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Associating with other children involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Appearing with unexplained gifts, money or new possessions.

# Whole School Safeguarding and Child Protection Policy

Criminal exploitation of children can include **County Lines**. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks / gangs groom and exploit children and young people to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked or the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered in addition to normal safeguarding procedures.

As well as the general indicators for CCE, all staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line, moving drugs, collecting money
- Being found in accommodation they have no connection
- Owing a 'debt bond' to their exploiters
- Having their bank account used to facilitate drug dealing.

**Child Sexual Exploitation** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence, this could be online or through technology.

The trust recognises that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The trust recognises that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The trust also recognise that pupils may not realise they are being exploited and they believe they are in a genuine romantic relationship.

All staff will consider the language and terms used when raising concerns and providing ongoing support to pupils who have experienced abuse through exploitation to ensure victims are not unintentionally blamed or seen as active participants in their own abuse.

Staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.



# Whole School Safeguarding and Child Protection Policy

- Regularly missing school or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered.

## 12. Child abduction and community safety incidents

For the purposes of this policy, **“child abduction”** is defined as: ‘the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child’. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

The board of trustees will ensure that information about community safety incidents is shared across all schools in the trust, especially those in close geographic proximity to one another.

Joint solutions and strategies will be implemented where a community safety incident impacts pupils at more than one school within the trust.

All trust schools have a lockdown procedure in the event of a serious incident impacting on the immediate safety of the school.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

## 13. Modern slavery

For the purposes of this policy, **“modern slavery”** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff within the trust will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

## 14. FGM

For the purposes of this policy, **“FGM”** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

The trust ensure that teachers within its schools are aware they are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action.

# Whole School Safeguarding and Child Protection Policy

## 15. Forced marriage

**Forced marriage** is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSC, the police or the Forced Marriage Unit. It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

## 16. Radicalisation

For the purposes of this policy, **“extremism”** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **“radicalisation”** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, **“terrorism”** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the trust's wider safeguarding duties. Schools within the trust will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. The trust will ensure procedures are in place for staff to be made aware of changes in pupils' behaviour which could indicate that they may need help or protection. The trust will also ensure that staff can use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a referral to Channel and are aware of how to do so - 'Notice. Check. Share.'

The trust will ensure that schools engage with parents and families on the matter, as they are in a key position to spot signs of radicalisation. In doing so, the trust will assist and advise schools in which family members raise concerns and provide information for support mechanisms.

# Whole School Safeguarding and Child Protection Policy

## The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools within the trust are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”. The Prevent duty will form part of the trust’s wider safeguarding obligations.

All staff will complete PREVENT training at point of induction. This will be regularly updated.

Where there are concerns raised under the Prevent Duty, the school will follow local arrangements for referring to the Local Prevent Team.

Lancashire Prevent Guidance: <https://www.lancashire.police.uk/help-advice/safer-communities/counter-terrorism/advice-for-schools/>

Sefton Prevent Guidance: <https://seftonscp.org.uk/scp/professionals/prevent-duty-guidance>

The trust PREVENT lead is: **Heather Fowler – Senior Safeguarding Lead.**

The school PREVENT lead is: **Mr J Thornberry**

## 17. Mental health

All staff within the trust will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff within the trust will not attempt to make a diagnosis of mental health problems and schools will ensure this is done by a trained mental health professional. Staff within all schools will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. The trust will ensure that staff are also made aware of how pupils’ experiences can impact on their mental health, behaviour, and education.

Staff within the trust and its schools who have a mental health concern about a pupil that is also a safeguarding concern are encouraged by the trust to act in line with this policy and speak to the DSL or DDSL(s).

The trust will ensure its schools can access a range of advice to help staff members identify pupils in need of additional mental health support, including working with external agencies. It will also ensure that there is a wide variety of advice and support offered to its schools while ensuring an ethos that is positive towards being open about mental health is adopted and implemented in each school.

Schools will ensure that appropriate advice and support is sought for pupils through immediate medical attention, early help processes or other local health services.

# Whole School Safeguarding and Child Protection Policy

## **18. Private fostering**

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify CSC as soon as possible to allow the LA/CSC to conduct any necessary checks.

## **19. Pupils with family members in prison**

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

## **20. Serious violence**

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

# Whole School Safeguarding and Child Protection Policy

## **21. Consensual and non-consensual sharing of indecent images and videos**

All schools within the trust will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

Staff within the trust will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff within the trust will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff within the trust becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the affected school's DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copying, printing, sharing, storing or saving the imagery.
- Inform the affected school's DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the school's DSL.
- Report the incident to the school's DSL.
- Reports of youth-produced sexual imagery will be managed by school level in line with this policy, the Behaviour Policy and statutory guidance.
- Indecent imagery that is not youth-produced sexual imagery will be managed by school in line with this policy and statutory guidance.

## **22. Context of safeguarding incidents**

Safeguarding incidents can occur outside of schools within the trust and can be associated with outside factors. All staff, particularly DSLs and DDSL(s), will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The schools within the trust will provide as much contextual information as possible when making referrals to CSC.

# Whole School Safeguarding and Child Protection Policy

## **23. Alternative provision**

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

School will ensure regular checks on attendance and welfare are made, liaising with the DSL in the setting, where appropriate.

## **24. Work experience**

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

School will ensure that checks on attendance are made for children on work experience.

## **25. Pupils potentially at greater risk of harm**

All schools within the trust recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

### **Pupils who need social workers**

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL within each school will hold and use information from their LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare and educational outcomes, e.g. considering the provision pastoral or academic support and support with behaviour.

### **Home-educated children**

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, each school within the trust will ensure it informs their LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from a school within the trust for EHE, the school, in collaboration with the trust, LA and other key professionals, will

# Whole School Safeguarding and Child Protection Policy

coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Where children are removed from roll for Elective Home Education and there are safeguarding concerns, school will ensure that concerns are shared with the LA.

## **LAC and PLAC**

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously LAC (PLAC), also known as care leavers, can also remain vulnerable after leaving care.

The board of trustees will ensure that staff in the trust have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL in each school will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

## **Pupils with SEND**

When managing safeguarding in relation to pupils with SEND, staff within the trust and its schools will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL in the affected school will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

## **LGBTQ+ pupils**

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff within the trust will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

# Whole School Safeguarding and Child Protection Policy

Staff within the trust will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. All staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

## **26. Adverse Childhood Experiences and trauma**

The trust acknowledges that children who have experienced adverse childhood experiences and trauma may be at increased risk of developing health and social difficulties.

All staff will be made aware of the long lasting impact of experiencing adversity and the lasting effect trauma can have on a child's development.

Where a pupil is known to have experienced trauma, appropriate arrangements will be made to provide support based on the needs of the pupil and in line with all relevant guidance and policies. This may include close multi-agency working with external services and making special considerations for behaviour.

## **27. Use of school premises for non-school activities**

Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's [guidance](#) on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement

### **Extracurricular activities and clubs**

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the schools in the trust to effectively safeguard pupils and adhere to local and trust-wide safeguarding arrangements.

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



# Whole School Safeguarding and Child Protection Policy

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

## **28. Concerns about pupils**

The trust will approve and continuously monitor the procedures within each school for reporting concerns about pupils' welfare. Monitoring visits will be conducted by the Senior Safeguarding Lead, at least termly, to assess whether each school:

- Has clear procedures for staff to report concerns to their DSL.
- Has clear procedures for their DSL to make referrals to their LA.
- Has trained its staff members to understand their responsibilities in these procedures.
- Has clear and maintained procedures in place for internal communication and safeguarding
- Has ensured all staff are aware of their obligations in relation to confidentiality and information sharing.

The outcomes of these visits, along with data from safeguarding systems and processes will be shared with Local Academy Councillors and Trustees through termly reporting. In addition, there will be regular meetings with the Safeguarding Local academy Councillor and school DSL, at least annually, to monitor progress and provide challenge and support.

Staff within the trust will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. All staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

The trust recognises that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. The trust is conscious of this when managing any incident and be prepared to use any term with which the individual is most comfortable.

## **29. Managing referrals**

All trust staff, in particular the DSLs and DDSs, will be aware of the LA's arrangements in place for managing referrals. The DSL in each school will provide staff members with clarity and support where needed. When making a referral to CSC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSLs will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSLs will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

# Whole School Safeguarding and Child Protection Policy

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support. Where CSC decide that a statutory investigation is not appropriate and the school disagrees, the school will consult with the local escalation procedure to raise a professional disagreement.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. All schools will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

## **30. Online Safety**

The trust is committed to keeping children safe online. The trust recognises that addressing online safety issues should form an integral part of the safeguarding arrangements in every school and that online safety should be an interrelated and running theme throughout the safeguarding approach across the trust.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

All trust schools will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material. This system will be monitored and reviewed with any inappropriate or concerning behaviours or searches being followed up appropriately.

All trust staff will be aware that ongoing in-person monitoring is required in addition to the software in place as it is vital staff don't rely solely on IT systems as this may leave some children vulnerable.

All trust schools will also ensure that it meets the [filtering and monitoring standards](#) published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Regular checks will be carried out by each school with the support of the Trustees and the Central Team.

# Whole School Safeguarding and Child Protection Policy

Each school will ensure appropriate communication with parents to support pupils being kept safe online whilst accessing online spaces and devices outside of school.

## **Personal electronic devices**

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Acceptable Use Policy.

Where photographs and videos will involve pupils who are CLA, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are CLA or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures. The trust is committed to keeping pupils safe by ensuring that electronic devices such as cameras, phones and tablets are used in an appropriate manner.

School will therefore ensure that:

- informed parental consent is obtained to take and use photographs and/or videos of children, for use in school, to market the school or to share on social media / internet
- staff, visitors, volunteers and students do not use their own mobile phones or devices to take or record any images of children.

## **31. Concerns about staff and safeguarding practices**

If a staff member in a school within the trust has concerns about another member of staff (including supply staff and volunteers), it will be raised with the headteacher of that school. If the concern is with regards to a headteacher within the trust, or where there may be a conflict of interests, concerns will be raised with the Chair of Trustees.

Processes for reporting low level concerns over a member of staff are outlined in the Staff Code of Conduct.

If a staff member feels unable to raise an issue within school, they should follow the Whistleblowing Policy. If staff feel unable to follow the trust's Whistleblowing Policy, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline on 0800 028 0285.

## **32. Allegations of abuse against staff**

All allegations against school staff, trust staff, supply staff, volunteers and contractors will be managed in line with the relevant procedures laid out by the individual school at which the staff members work or have worked. The trust will ensure its schools are equipped to manage all allegations against staff, including those who are not employees of schools within the trust, and that the affected schools liaise with the relevant parties.

# Whole School Safeguarding and Child Protection Policy

When managing allegations against staff, the trust will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”.

Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

All staff will be made aware of and receive training on reporting of concerns, including being made aware of the role of the Local Authority Designated Officer (LADO).

Lancashire LADO – email: [LADO.admin@lancashire.gov.uk](mailto:LADO.admin@lancashire.gov.uk) Tel: 01772 536 694

Sefton LADO – email: [safeguardingunitadmin@sefton.gov.uk](mailto:safeguardingunitadmin@sefton.gov.uk) Tel: 0151 934 3783

## Low Level Concerns

The Trust will strive to embed a culture of openness, trust and transparency in which the values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff. The Trust ensure that all staff are aware of how to recognise and report **low level concerns** around staff behaviour or conduct

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

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

# Whole School Safeguarding and Child Protection Policy

The Trust will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

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

All staff are clear on how to report low level concerns and will be empowered to do so. Staff must report their concerns to the Head teacher. If concerns are surrounding the Head teacher, this must be referred to the Chair of Governors. Guidance from Keeping Children Safe in Education, September 2023, paragraphs 436 – 439 will be followed in view of recording and storage of such concerns.

If in doubt whether the concern is a low-level concern, the Head will consult with LADO for guidance.

The governing body will ensure low level concern procedures and staff behaviour expectations are clearly addressed within the staff code of conduct and procedures are implemented effectively, ensuring that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school or college approach to dealing with any concerns.

### **33. Communication and confidentiality**

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the data protection policies of the trust and individual schools within the trust.

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

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

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

# Whole School Safeguarding and Child Protection Policy

Depending on the nature of a concern, the DSL of the affected school will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the trust will ensure the appropriate disciplinary procedures are implemented as necessary and will analyse how damage can be minimised and future breaches be prevented.

## **34. Safer recruitment**

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The board of trustees will conduct the appropriate pre-employment checks for all prospective trust employees, including internal candidates and candidates who have lived or worked outside the UK. This responsibility may be delegated by the board of trustees as required.

The appropriate DBS and suitability checks will be carried out for all trustees and local governors, volunteers, and contractors within the trust.

The chair of trustees will undertake a suitability check by the ESFA and an enhanced DBS check that will be carried out regardless of checks previously performed by other organisations or how recently these took place.

## **Referral to the DBS**

The trust will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

## **Single central record (SCR)**

Each school keeps an SCR which records all staff, including agency and third-party supply staff (for longer placements), and teacher trainees on salaried routes, who work at the school.

All members of the proprietor body are also recorded on the SCR.

# Whole School Safeguarding and Child Protection Policy

The MAT holds a central SCR containing information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions
- Any other information deemed relevant.

If any checks have been conducted for volunteers or Trustees/Governors, these may also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

The details of an individual will be removed from the SCR once they no longer work at the school.

## 35. Monitoring and review

This policy is reviewed at least annually by the designated safeguarding trustee and board of trustees. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of the trust. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is **September 2024**

## Key contacts and training

Trust contacts and training details		
Role	Name	Details of training
Trust Senior Safeguarding Lead	Heather Fowler <a href="mailto:h.fowler@endeavourlearning.org">h.fowler@endeavourlearning.org</a> Tel: 01772 817 904	Lancashire County Council DSL Training July 2022
Prevent Lead	Heather Fowler <a href="mailto:h.fowler@endeavourlearning.org">h.fowler@endeavourlearning.org</a> Tel: 01772 817 904	Home Office PREVENT Training July 2022

# Whole School Safeguarding and Child Protection Policy

Operation Encompass Lead	Heather Fowler <a href="mailto:h.fowler@endeavourlearning.org">h.fowler@endeavourlearning.org</a> Tel: 01772 817 904	Operation Encompass PAN Merseyside July 2023
Safeguarding Trustee	Helen Dicker	ELT Safeguarding Training September 2022

School DSL contacts and training		
Role	Name	Details of training
Deputy DSL Pastoral and Behaviour Manager	Helen Pardoe-Matthews	19-Jan-23
DSL Pastoral and Behaviour Team Leader	Justin Thornberry	19-Jan-23
Deputy DSL Pastoral and Behaviour Manager	Lucia Pagliarulo	26-June-23
Deputy DSL Headteacher	Lucy MacLaren	24-Apr-22