Omega Multi-Academy Trust

Child Protection and Safeguarding Policy

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Policy Type	Statutory
Author	Jan Malone
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Owner	Director of Safeguarding

This policy uses The School Bus model and takes due consideration of all policies that transferred across to the Omega Multi-Academy Trust on conversion.

Review Date & Summary Changes

September 2021 Version 1.1	UPDATED - Statement of Intent
	UPDATED - Definitions
	UPDATED – Legal Framework
	UPDATED – Roles and Responsibilities
	UPDATED – Multi – Agency Working
	UPDATED – Early Help
	NEW – Domestic Abuse
	NEW – Child Abduction and Community Safety Incidents
	UPDATED – Child Criminal Exploitation
	NEW – Modern Slavery
	UPDATED - FGM
	UPDATED – Forced Marriage
	UPDATED – Radicalisation
	UPDATED – Mental Health
	UPDATED – Peer on Peer Abuse
	UPDATED – Sexual Violence
	UPDATED – Serious Violence
	UPDATED – Pupils potentially at greater risk of harm
	NEW – Use of School Premises for Non-School Activities
	UPDATED - Allegations of Abuse Against Staff
	UPDATED – Safer Recruitment
	UPDATED – Single Central Record
	UPDATED - Training
	UPDATED - Monitoring and Review
October 2021 Version 1.2	UPDATED -Consensual and Non-Consensual Sharing of Indecent Images and Videos
	UPDATED – Dealing with Allegations of Abuse Against Staff
January 2022 Version 1.3	UPDATED – Mental Health

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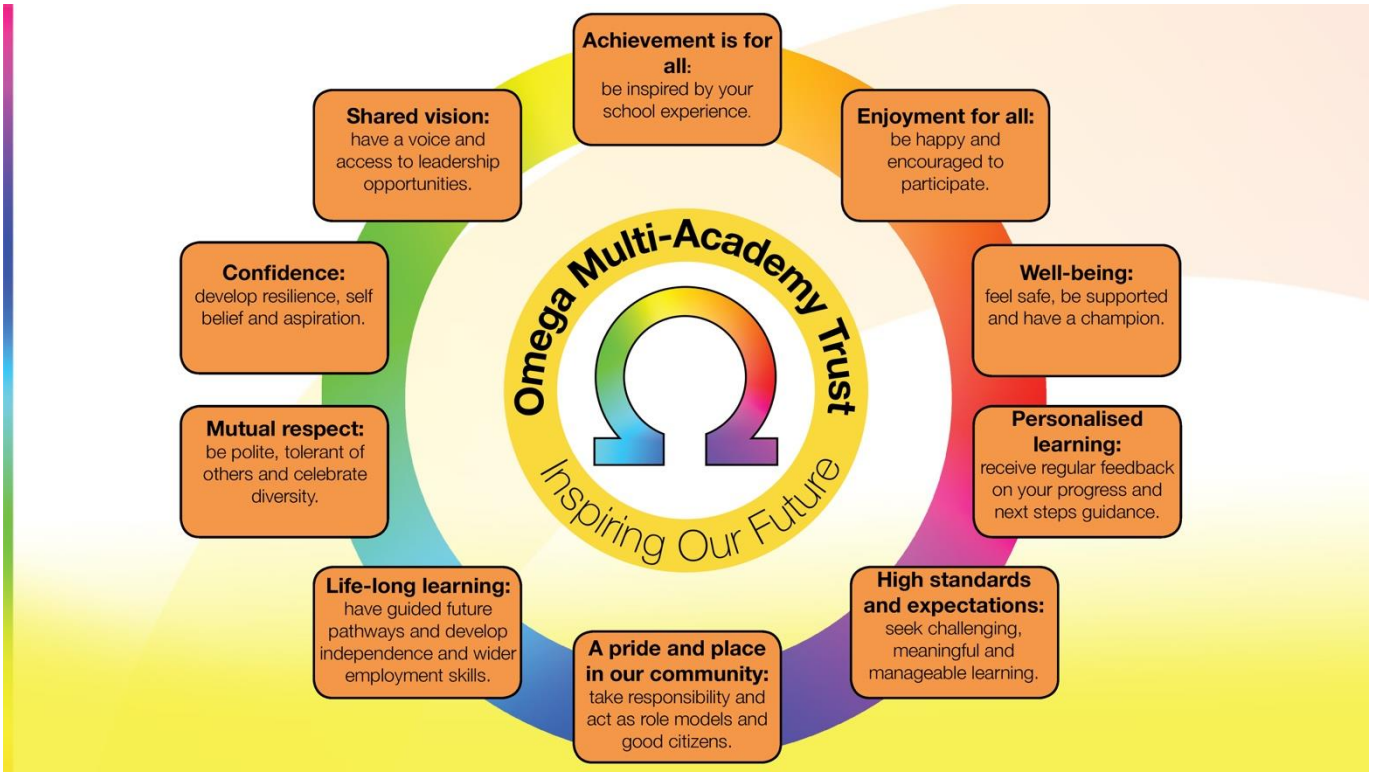
Omega Multi-Academy Trust
Mission Statement

The Omega learning community provides excellent teaching and learning with passion and purpose, based on core values, understood by all. Working in a warm and welcoming, yet purposeful environment, our mission is for everyone to be happy and inspired by their school experience. We empower students to harness their own creativity, to raise their aspirations and to achieve their potential. Working together, they gain confidence and pride to take their place in our community.



Rationale:

Omega Values	How this policy addresses these values
Achievement is for all: be inspired by your school experience.	All students to feel safe and supported in the school community. To thrive and achieve even when faced with difficult life situations.
Enjoyment for all: be happy and encouraged to participate.	Ensuring all students are encouraged to participate with support regardless of personal difficulties or experiences.
Well-being: feel safe, be supported and have a champion.	All students to feel safe and secure in the school community and to be aware of adults, or peers available for advice and support in times of personal crisis.
Personalised Learning: receive regular feedback on your progress and next-steps guidance.	Bespoke support plans in collaboration with appropriate external agencies.
High Standards and Expectations: seek challenging, meaningful and manageable learning.	All students supported to 'aim high' despite having to deal and manage with difficult situations outside school.
A Pride and place in our community: take responsibility and act as role models and good citizens.	All students encouraged to take pride and place in our community even when facing personal difficulties. To understand how to keep themselves safe and to demonstrate resilience to others.
Life-long learning: have guided future pathways and develop independence and wider employment skills.	All students guided to access pathways through intervention strategies and access to mentor and counselling services in school.
Mutual respect: be polite, tolerant of others and celebrate diversity.	All students to show respect and tolerance of others despite suffering at the hands of others.
Confidence: develop resilience, self-belief and aspiration.	All students given the opportunity to access support services in and out of school which will enable them to develop resilience, believe in themselves and raise their self-esteem.
Shared Vision: have a voice and access to leadership opportunities.	All students encouraged to provide support and leadership to others through peer mentoring, active involvement on the school council.

Statement of Intent

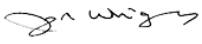
The Omega Multi-Academy Trust ("The Trust) is committed to safeguarding and promoting the welfare, both physical and emotional, of every pupil both inside and outside of the trust premises. We implement a preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

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

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children;
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable;
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Ensuring that members of the Governing Body, the Headteacher, Chief Executive and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and know to refer concerns to the DSL;
- Ensuring that the Headteacher and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The DSLs and Deputy DSLs for schools within the trust are listed in appendix 5.

Signed by:

	CEO	Date:	23/02/2021
	Chair of Trustees	Date:	23/02/2021

Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage, increased status or other advantage of the perpetrator or facilitator.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school/trust.
DfE	Department for Education	The national government body with responsibility for children's' services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school/trust with responsibility for overseeing data protection strategy and implementation to ensure compliance with the Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school/trust.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and social needs for pupils who have

		significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	A procedure where the female genital organs are injured or changed and there is no medical reason for this.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation, forced marriage, and practices such as breast ironing.
HMCTS	HM Courts and Tribunal Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
ITT	Initial teacher training	A programme of training to achieve qualified teacher status.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	A child who has been placed in local authority care or where children's

		services have looked after a child for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer	Term relating to a community of people, protected by the Equalities Act 2010, who identify as a lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
QTS	Qualified teacher status	A requirement in England to work as a teacher of children in state schools and special schools.
RSE	Relationships and sex education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of school's special educational needs policy and provision of education to pupils with special educational needs.
SEND	Special educational needs and disabilities	A pupil is assessed to have SEND if they have a learning problem or disability that makes it more difficult for them to learn than most pupils their age.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.

TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for.

1. Definitions

1.1 The terms **"children"** and **"child"** refer to anyone under the age of 18.

1.2 For the purposes of this policy, "safeguarding and protecting the welfare of children" is defined as:

1.2.1 Protecting pupils from maltreatment

1.2.2 Preventing the impairment of pupils' mental and physical health or development

1.2.3 Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care

1.2.4 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.

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

1.3.1 **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.

1.3.2 **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.

1.3.3 **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.

1.3.4 **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.

1.4 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:

1.4.1 Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.

1.4.2 Sexual "jokes" and taunting.

1.4.3 Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.

1.4.4 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.

1.5 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.

1.6 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:

1.6.1 Nude or semi-nude sexual posing

1.6.2 A child touching themselves in a sexual way

1.6.3 Any sexual activity involving a child

1.6.4 Someone hurting a child sexually

1.6.5 Sexual activity that involves animals

1.7 The term **"teaching role"** is defined as planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting on the development, progress and attainment of pupils. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Headteacher to provide such direction and supervision.

1.8 For the purpose of this policy, "**peer-on-peer**" abuse is defined as abuse between children. This can include, but is not limited to the following:

1.8.1 Abuse within intimate partner relationships

1.8.2 Bullying (including cyberbullying)

1.8.3 Sexual violence and sexual harassment

1.8.4 Physical abuse and physical harm

1.8.5 Sexting

1.8.6 Initiation/hazing-type violence and rituals

2. Legal Framework

2.1 This policy has been created with due regard to all relevant legislation 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)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

Statutory Guidance

- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty guidance: protecting people vulnerable to being drawn to terrorism'
- DfE (2021) 'Keeping children safe in education 2021'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2021) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory Guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

This policy operates in conjunction with the following school policies:

- Children Missing Education Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Duty Policy
- Peer-on-Peer Abuse Policy
- Anti-Bullying Policy
- Exclusion Policy
- Online Safety Policy

- Data and Cyber-security Breach Prevention and Management Plan
- Personal Electronic Devices Policy
- Data Protection Policy
- Photography Policy
- Records Management Policy
- LAC Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Behavioural Policy

3. Roles and Responsibilities

3.1 **The Governing Body/Trustee Board has a duty to:**

3.1.1 Take strategic leadership responsibility for the school's safeguarding arrangements.

3.1.2 Ensure that the trust complies with its duties under the above child protection and safeguarding legislation.

3.1.3 Guarantee that the policies, procedures and training opportunities in the trust are effective and comply with the law at all times.

3.1.4 Guarantee that the trust contributes to inter-agency working in line with the statutory guidance '**Working Together to Safeguard Children**'.

3.1.5 Confirm that the trust's safeguarding arrangements take into account the procedures and practices of the Trust as part of the inter-agency safeguarding procedures.

3.1.6 Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the trust's policies and procedures.

3.1.7 Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.

3.1.8 Ensure that staff working directly with children read at least Part one of KCSIE.

3.1.9 Ensure that staff members have due regard to relevant data protection principles that allow them to share (and withhold) personal information.

3.1.10 Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE. NB: Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.

3.1.11 Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.

3.1.12 Ensure that a member of the Governing Body/Trustee Board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Headteacher or another Governor.

3.1.13 Guarantee that there are effective child protection policies and procedures in place together with a Staff Code of Conduct.

3.1.14 Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.

3.1.15 Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.

3.1.16 Appoint one or more Deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).

3.1.17 Ensure all relevant persons are aware of the trust's local safeguarding arrangements, including the Governing Board itself, the SLT and DSL.

3.1.18 Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

3.1.19 Make sure that pupils are taught about safeguarding, 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.

3.1.20 Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.

3.1.21 Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.

3.1.22 Ensure that staff members are appropriately trained to support pupils to be themselves at the trust, e.g. if they are LGBTQ+.

3.1.23 Ensure the trust 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.

3.1.24 Guarantee that volunteers are appropriately supervised.

3.1.25 Make sure that at least one person on any appointment panel has undertaken safer recruitment training.

3.1.26 Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.

3.1.27 Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.

3.1.28 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.

3.1.29 Guarantee that there are effective and appropriate policies and procedures in place.

3.1.30 Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.

3.1.31 Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.

3.1.32 Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils.

3.1.33 Guarantee that there are systems in place for pupils to express their views and give feedback.

3.1.34 Establish an early help procedure and ensure all staff understand the procedure and their role in it.

3.1.35 Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.

3.1.36 Ensure that the designated teacher works with the Virtual School Head (VSH) to discuss how the pupil premium funding can best be used to support LAC.

3.1.37 Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.

3.1.38 Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the pupil's legal status, contact details and care arrangements.

3.1.39 Put in place appropriate safeguarding responses for pupils who go missing from the trust, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.

3.1.40 Ensure that all members of the Governing Body/Trust Board have been subject to an enhanced DBS check.

3.1.41 Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

3.2 Teachers, including the headteacher, have a responsibility to:

3.2.1 Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.

3.3 **The Headteacher has a duty to:**

3.3.1 Safeguard pupils' wellbeing and maintain public trust in the teaching profession.

3.3.2 Ensure that the policies and procedures adopted by the trust, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.

3.3.3 Provide staff with the appropriate policies and information upon induction

3.4 **The Director of Safeguarding and DSLs have a duty to:**

3.4.1 Take lead responsibility for safeguarding and child protection, including online safety.

3.4.2 Understand and keep up-to-date with local safeguarding arrangements.

3.4.3 Act as the main point of contact with the three safeguarding partners and the child death review partner

3.4.4 Contribute to the assessment of children, and/or support other staff to do so.

3.4.5 Make the necessary child protection referrals to appropriate agencies.

3.4.6 Understand when they should consider calling the police, in line with the National Police Chiefs' Council (NPCC) guidance.

3.4.7 Liaise with the Headteacher/Chief Executive to inform them of safeguarding issues and ongoing enquiries.

3.4.8 Liaise with the Deputy DSL(s) to ensure effective safeguarding outcomes.

3.4.9 Refer cases:

- To CSCS where abuse and neglect are suspected, and support staff who make referrals CSCS.
- 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.

3.4.10 Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.

3.4.11 Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.

3.4.12 Understand the assessment process for providing early help and intervention.

3.4.13 Support staff members in liaising with other agencies and setting up inter-agency assessments where early help is deemed appropriate.

3.4.14 Keep cases of early help under constant review and refer them to the CSCS if the situation does not appear to be improving.

3.4.15 Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

3.4.16 Liaise with the case manager and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff.

3.4.17 Ensure each member of staff has access to and understands the trust Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.

3.4.18 Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.

3.4.19 Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

3.4.20 Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:

- Ensuring that the school knows which pupils have or had a social worker.
- Understanding the academic progress and attainment of these pupils.
- Maintaining a culture of high aspirations for these pupils.
- Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
- Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.

3.4.21 Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.

3.4.22 Be alert to the specific requirements of children in need, including those with SEND and young carers.

3.4.23 Keep detailed, accurate and secure records of concerns and referrals.

3.4.24 Secure access to resources and attends any relevant training courses.

3.4.25 Encourage a culture of listening to children and taking account of their wishes and feelings.

3.4.26 Work with the trust to ensure the trust Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly.

3.4.27 Ensure the trust's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the trust may make referrals for suspected cases of abuse or neglect, as well as the role the trust plays in these referrals.

3.4.28 Ensure the best educational outcomes by identifying at-risk pupils to the trust and its staff, so that the relevant personnel understand each pupil's educational and welfare needs.

3.4.29 Support teaching staff to identify the challenges that at-risk pupils may face and the additional academic support and adjustments they can make to support these pupils.

3.4.30 Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding.

3.4.31 Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.

3.4.32 Be available at all times during school hours to discuss any safeguarding concerns. NB. The trust will determine what "available" means, e.g. it may be appropriate to be accessible via electronic means, such as on the phone or using video conferencing software.

3.4.33 Undergo training, and update this training at least every two years.

3.4.34 Hold the details of the LA Personal Advisor and liaise with them as necessary.

3.4.35 Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

3.4.36 Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.

3.4.37 Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.

3.4.38 The designated person has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

3.5 **Other staff members have a responsibility to:**

3.5.1 Consider, at all times, what is in the best interest of the pupil.

3.5.2 Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties.

3.5.3 Provide a safe environment in which pupils can learn.

3.5.4 Act in accordance with the trust procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.

3.5.5 Maintain an attitude of 'it could happen here' where safeguarding is concerned.

3.5.6 Be aware of the signs of abuse and neglect.

3.5.7 Be prepared to identify pupils who may benefit from early help.

3.5.8 Be aware of the early help process and understand their role in it.

3.5.9 Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.

3.5.10 Be aware of the role and identity of the DSL and deputy DSLs.

3.5.11 Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.

3.5.12 Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.

3.5.13 Act as the lead professional in undertaking an early help assessment, where necessary.

3.5.14 Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.

3.5.15 Be confident of the processing conditions under relevant data protection legislation, including information which is sensitive and personal, and information that should be treated as special category data.

3.5.16 Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.

3.5.17 Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.

3.5.18 Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.

3.5.19 Support social workers in making decisions about individual children, in collaboration with the DSL.

3.5.20 Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.

3.5.21 Speak to the DSL if they are unsure about how to handle safeguarding matters.

3.5.22 Be aware of safeguarding issues that can put pupils at risk of harm.

3.5.23 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.

3.5.24 Follow the trust's procedure for, and approach to, preventing radicalisation.

3.5.25 Challenge senior leaders over any safeguarding concerns, where necessary.

4. Multi-Agency Working

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

The Trust will be fully engaged, involved, and included in local safeguarding arrangements. Once the Trust is 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. The Trust will act in accordance with the safeguarding arrangements.

The Trust will work with CSCS, 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 early help is identified, the Trust will allow access for CSCS 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 CSE.

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 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 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 staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

5. Abuse and Neglect

5.1 All members of staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another.

5.2 All staff, especially the DSL and their deputies, will be aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms).

5.3 All staff members will be aware of the indicators of abuse and the appropriate action to take following a pupil being identified as at potential risk of abuse or neglect.

5.4 When identifying pupils at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:

5.4.1 Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age

5.4.2 Lack of concentration and acting withdrawn

5.4.3 Knowledge ahead of their age, e.g. sexual knowledge.

5.4.4 Use of explicit language

5.4.5 Fear of abandonment

5.4.6 Depression and low self-esteem

5.5 All members of staff will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting.

5.6 All staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in section 30 of this policy.

5.7 All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put pupils in danger.

5.8 Staff members will be aware of the effects of a pupil witnessing an incident of abuse, such as witnessing domestic violence at home.

6. Types of Abuse and Neglect

6.1 **Abuse:** For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. 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.

6.2 **Physical abuse:** For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, 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.

6.3 **Emotional abuse:** For the purposes of this policy, **"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.

6.4 **Sexual abuse:** For the purposes of this policy, **"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.

6.5 **Neglect:** For the purposes of this policy, **"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 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. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will 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 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 of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

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

7. Domestic abuse

7.1 For the purpose of this policy, and in line with the Domestic Abuse Act 2021, **"domestic abuse"** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) 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. **"Personally connected"** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the 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.

8. FGM

8.1 For the purpose 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.

8.2 The trust's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

8.3 FGM is considered a form of abuse in the UK and is illegal.

8.4 All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

8.5 As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers 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. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

8.6 There are a range of potential indicators that a pupil may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the pupil.

8.7 Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

8.8 Indicators that may show a heightened risk of FGM include the following:

8.8.1 The socio-economic position of the family and their level of integration into UK society

8.8.2 Any girl with a mother or sister who has been subjected to FGM

8.8.3 Any girl withdrawn from PSHE

8.9 Indicators that may show FGM could take place soon include the following:

8.9.1 When a female family elder is visiting from a country of origin

8.9.2 A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'

8.9.3 A girl may request help from a teacher if she is aware or suspects that she is at immediate risk

8.9.4 A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

8.10 Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

8.11 Indicators that FGM may have already taken place include the following:

8.11.1 Difficulty walking, sitting or standing

8.11.2 Spending longer than normal in the bathroom or toilet

8.11.3 Spending long periods of time away from a classroom during the day with bladder or menstrual problems

8.11.4 Prolonged or repeated absences from school followed by withdrawal or depression

8.11.5 Reluctance to undergo normal medical examinations

8.11.6 Asking for help, but not being explicit about the problem due to embarrassment or fear

8.12 Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

8.13 FGM is also included in the definition of 'honour-based' abuse (HBA), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

8.14 All forms of HBA are forms of abuse and will be treated and escalated as such.

8.15 Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

9. Forced Marriage

9.1 For the purpose of this policy, a **"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.

9.2 As part of HBA, staff will be alert to the signs of forced marriage including, but not limited to, the following:

9.2.1 Becoming anxious, depressed and emotionally withdrawn with low self-esteem

9.2.2 Showing signs of mental health disorders and behaviours such as self-harm or anorexia

9.2.3 Displaying a sudden decline in their educational performance, aspirations or motivation

9.2.4 Regularly being absent from school

9.2.5 Displaying a decline in punctuality

9.2.6 An obvious family history of older siblings leaving education early and marrying early

9.3 If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

10. Child Sexual Exploitation (CSE)

10.1 For the purpose of this policy, **"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:

10.1.1 In exchange for something the victim needs or wants

10.1.2 For the financial advantage or increased status of the perpetrator or facilitator

10.1.3 Through violence or the threat of violence

10.2 CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

10.3 The trust has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

10.4 The school will recognise 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 school will recognise 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 school will also recognise that pupils may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Identifying Cases

10.5 The trust staff members will be aware of the key indicators that a pupil is the victim of CSE, including:

10.5.1 Appearing with unexplained gifts, money or new possessions.

10.5.2 Associating with other children involved in exploitation.

10.5.3 Suffering from changes in emotional wellbeing.

10.5.4 Misusing drugs or alcohol.

10.5.5 Going missing for periods of time or regularly coming home late.

10.5.6 Regularly missing school or education or not taking part.

10.5.7 Having older boyfriends or girlfriends.

10.5.8 Suffering from sexually transmitted infections.

10.5.9 Displaying sexual behaviours beyond expected sexual development.

10.5.10 Becoming pregnant.

All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

Referring Cases

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

Support

10.7 The LA and all other necessary authorities will then handle the matter to conclusion. The trust will cooperate as needed.

11. Child Criminal Exploitation (CCE)

11.1 For the purpose of this policy, **"child criminal exploitation"** is defined as: where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, for any, or all, of the following reasons:

11.1.1 In exchange for something the victim needs or wants

11.1.2 For the financial advantage or other advantage of the perpetrator or facilitator

11.1.3 Through violence or the threat of violence

11.2 Specific forms of CCE can include:

11.2.1 Being forced or manipulated into transporting drugs or money through county lines.

11.2.2 Working in cannabis factories.

11.2.3 Shoplifting or pickpocketing.

11.2.4 Committing vehicle crime.

11.2.5 Committing, or threatening to commit, serious violence to others.

11.3 CCE may be in effect even if the criminal activity appears consensual and can happen through the use of technology.

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

Identifying Cases

11.5 The trust staff will be aware of the indicators that a pupil is the victim of CCE, including:

11.5.1 Appearing with unexplained gifts, money or new possessions

11.5.2 Associating with other young people involved in exploitation

11.5.3 Suffering from changes in emotional wellbeing

11.5.4 Misusing drugs or alcohol

11.5.5 Going missing for periods of time or regularly coming home late

11.5.6 Regularly missing school or education or not taking part

12. Mental Health

12.1 All staff 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.

12.2 Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff 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. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

12.3 Staff will be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one.

12.4 Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or a Deputy.

12.5 The trust will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

12.6 In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

13. Consensual and non-consensual sharing of indecent images and videos

13.1 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.

13.2 Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and

expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. 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.

13.3 Staff will receive appropriate training around how to deal with instances of sexting in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of sexting.

13.4 Staff will be aware that creating, possessing, and distributing indecent imagery of pupils 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.

13.5 Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the 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:

13.5.1 Refrain from viewing, copy, printing, sharing, storing or saving the imagery

13.5.2 Tell the DSL immediately if they accidentally view an indecent image and seek support

13.5.3 Explain to the pupil that the incident will need to be reported

13.5.4 Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL

13.5.5 Report the incident to the DSL

13.6 The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

13.6.1 **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.

13.6.2 **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

13.7 Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

13.7.1 Discuss this decision with the headteacher or member of the SLT

13.7.2 Ensure the image is, where possible, viewed by someone of the same sex as the individual depicted

13.7.3 Ensure viewing takes place within the trust premises and with another member of staff present in the room – this staff member does not need to view the imagery

13.7.4 Record how and why the decision was made to view the imagery.

13.8 Where the incident is categorised as 'aggravated', the situation will be managed in line with section 31 of this policy.

13.9 Where the incident is categorised as 'experimental', the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident.

13.10 Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL escalates the incident to CSCS.

13.11 Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

14. Homelessness

14.1 The DSL and Deputy(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

14.2 Indicators that a family may be at risk of homelessness include the following:

14.2.1 Household debt

14.2.2 Rent arrears

14.2.3 Domestic abuse

14.2.4 Anti-social behaviour

14.2.5 Any mention of a family moving home because "they have to"

14.3 Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

14.4 For 16 and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

15. County Lines

15.1 For the purpose of this policy, "**County lines**" refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

15.2 Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.

15.3 Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

15.4 The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

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

15.5.1 Going missing and subsequently being found in areas away from their home.

15.5.2 Having been the victim or perpetrator of serious violence, e.g. knife crime.

15.5.3 Receiving requests for drugs via a phone line.

15.5.4 Moving drugs.

15.5.5 Handing over and collecting money for drugs.

15.5.6 Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

15.5.7 Being found in accommodation they have no connection with or a hotel room where there is drug activity.

15.5.8 Owing a 'debt bond' to their exploiters.

15.5.9 Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

16. Cyber-crime

16.1 For the purposes of this policy, **"cyber-crime"** is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

16.1.1 Unauthorised access to computers, known as 'hacking'.

16.1.2 Denial of Service attacks, known as 'booting'.

16.1.3 Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

17. Serious Violence

17.1 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, the following:

17.1.1 Increased absence from school

17.1.2 A change in friendships

17.1.3 New relationships with older individuals or groups

17.1.4 A significant decline in academic performance

17.1.5 Signs of self-harm

17.1.6 A significant change in wellbeing

17.1.7 Signs of assault

17.1.8 Unexplained injuries

17.1.9 Unexplained gifts or new possessions

17.2 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:

17.2.1 Being male.

17.2.2 Having been frequently absent from school.

17.2.3 Having been permanently excluded from school.

17.2.4 Anti-social behaviour

17.2.5 Having experienced child maltreatment

17.2.6 Having been involved in offending, such as theft or robbery.

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

18. Pupils with Family Members in Prison

18.1 Pupils with a family member in prison will be offered pastoral support as necessary.

18.2 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.

19. Pupils Required to Give Evidence in Court

19.1 Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

19.2 Pupils will also be provided with the booklet 'Going to Court' from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.

19.3 Pupils will also be provided with the booklet 'Going to Court and Being a Witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

20. Pupils Potentially at Greater Risk of Harm

The school 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.

20.1 **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 will hold and use information from the 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, e.g. considering the provision pastoral or academic support.

20.2 **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, the school will inform the 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 school for EHE, the school, in collaboration with the LA and other key professionals, will 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.

20.3 **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. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff 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 will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the school's LAC Policy.

20.4 Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff 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 disproportionally 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 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.

21. Use of the 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 arrangements are in place to keep pupils safe.

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.

21.1 Extracurricular activities and clubs

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

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.

22. Contextual Safeguarding

22.1 Safeguarding incidents can occur outside of school and can be associated with outside factors. The trust staff, particularly the DSL and their Deputy(s), will always consider the context of incidents – this is known as contextual safeguarding.

22.2 Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

22.3 The trust will provide as much contextual information as possible when making referrals to CSCS.

23. Radicalisation

23.1 For the purpose of this policy, we have used the following definitions:

23.1.1 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.

23.1.2 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.

23.1.3 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.

23.2 Protecting children from the risk of radicalisation is part of the trust's wider safeguarding duties.

23.3 The trust will actively assess the risk of pupils being drawn into terrorism.

23.4 Staff will be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection.

23.5 Staff will 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 Prevent referral. The school will work with local safeguarding arrangements as appropriate.

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

23.7 Any concerns over radicalisation will be discussed with a child's parents, unless the trust has reason to believe that the child would be placed at risk as a result.

The Prevent Duty

23.8 Under section 26 of the Counter-Terrorism and Security Act 2015, all schools 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 school's wider safeguarding obligations.

The Trust's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

Training

23.9 The DSL will undertake Prevent Awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

Risk Indicators of Vulnerable Pupils

23.10 Indicators of an identity crisis include the following:

23.10.1 Distancing themselves from their cultural/religious heritage

23.10.2 Uncomfortable with their place in society

23.11 Indicators of a personal crisis include the following:

23.11.1 Family tensions

23.11.2 A sense of isolation

23.11.3 Low self-esteem

23.11.4 Disassociation from existing friendship groups

23.11.5 Searching for answers to questions about identity, faith and belonging

23.12 Indicators of vulnerability through personal circumstances includes the following:

23.12.1 Migration

23.12.2 Local community tensions

23.12.3 Events affecting their country or region of origin

23.12.4 Alienation from UK values

23.12.5 A sense of grievance triggered by personal experience of racism or discrimination

23.13 Indicators of vulnerability through unmet aspirations include the following:

23.13.1 Perceptions of injustice

23.13.2 Feelings of failure

23.13.3 Rejection of civic life

23.13.4 Indicators of vulnerability through criminality:

23.13.5 Experiences of dealing with the police

23.13.6 Involvement with criminal groups

Making a Judgement

23.14 When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil sympathise with or support illegal/illicit groups?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Has the pupil witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the pupil travelled for extended periods of time to international locations?
- Has the pupil employed any methods to disguise their identity?

- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?
- Is the pupil the victim of social isolation?
- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?

- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?

23.15 Critical indicators include where the pupil is:

- In contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Making significant changes to their appearance and/or behaviour

23.16 Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

23.17 The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

Channel Programme

23.18 Safeguarding children is a key role for both the trust and the LA which is implemented through the use of the Channel programme. This service shall be used where a vulnerable pupil is at risk of being involved in terrorist activities.

23.19 In line with statutory duties, the trust and the LA will cooperate with the local Channel Prevent panel and all partners of the panel as much as is appropriate and reasonably practical.

23.20 In cases where the trust believes a pupil is potentially at serious risk of being radicalised, the Headteacher or DSL will contact the Channel programme.

23.21 The DSL will also support any staff making referrals to the Channel programme.

23.22 The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

23.23 The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the trust.

23.24 The delivery of the Channel programme may often overlap with the implementation of the LA's or the trust's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

23.25 The trust will keep in mind that an individual's engagement with the Channel programme is voluntary at all stages.

Extremist Speakers

23.26 The trust will prevent speakers who may promote extremist views from using the trust premises.

Building Children's Resilience

23.27 The trust will:

23.27.1 Provide a safe environment for debating controversial issues

23.27.2 Promote fundamental British values, alongside pupils' spiritual, moral, social and cultural development

23.27.3 Allow pupils time to explore sensitive and controversial issues

23.27.4 Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing

23.27.5 Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments

23.27.6 Teach pupils about how democracy, government and law making/enforcement occur

23.27.7 Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK

Resources

23.28 The trust will utilise the following resources when preventing radicalisation:

23.28.1 Local safeguarding arrangements

23.28.2 Local police (contacted via 101 for non-emergencies)

23.28.3 The DfE's dedicated helpline (020 7340 7264)

23.28.4 The Channel awareness programme

23.28.5 The Educate Against Hate website

24. A Child Missing from Education

24.1 A child going missing the trust is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation.

24.2 Staff will monitor pupils that go missing from the trust, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures.

24.3 The trust will inform the LA of any pupil who fails to attend regularly or has been absent without the trust's permission for a continuous period of 10 school days or more.

Admissions Register

24.4 Pupils are placed on the admissions register at the beginning of the first day that is agreed by the trust, or when the trust has been notified that the pupil will first be attending.

24.5 The trust will notify the LA within five days of when a pupil's name is added to the admissions register.

24.6 The trust will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.

24.7 Two emergency contact details will be held for each pupil where possible.

24.8 Staff will monitor pupils who do not attend the trust on the agreed date and will notify the LA at the earliest opportunity.

24.9 If a parent notifies the trust that their child will live at a different address, the trust will record the following information on the admissions register:

24.9.1 The full name of the parent with whom the pupil will live

24.9.2 The new address

24.9.3 The date from when the pupil will live at that address

24.10 If a parent notifies the trust that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

24.10.1 The name of the new school

24.10.2 The date on which the pupil first attended, or is due to attend, that school

24.11 Where a pupil moves to a new school, the trust will use a secure internet system to securely transfer pupils' data.

24.12 To ensure accurate data is collected to allow effective safeguarding, the trust will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

24.12.1 Have been taken out of the trust by their parents, and are being educated outside the national education system, e.g. home education

24.12.2 Have ceased to attend the trust, and no longer live within a reasonable distance of the premises

24.12.3 Have been certified by the trust's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend the trust after ceasing to be of compulsory school age

24.12.4 Have been in custody for a period of more than four months due to a final court order and the trust does not reasonably believe they will be returning to the school at the end of that period

24.12.5 Have been permanently excluded

24.13 The trust will also remove a pupil from the admissions register where the trust and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

24.14 If a pupil is to be removed from the admissions register, the trust will provide the LA with the following information:

24.14.1 The full name of the pupil

24.14.2 The full name and address of any parent with whom the pupil lives

24.14.3 At least one telephone number of the parent with whom the pupil lives

24.14.4 The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable

24.14.5 The name of the pupil's new school and the pupil's expected start date there, if applicable

24.14.6 The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

24.15 The trust will work with the LA to establish methods of making returns for pupils back into the trust.

24.16 The trust will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.

24.17 The trust will also highlight any other necessary contextual information including safeguarding concerns

25. Child Abduction and Community Safety Incidents

25.1 The purposes of this policy, **"child abduction"** is define 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.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

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

26. Pupils with SEND

26.1 The trust recognises that pupils with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of pupils.

26.2 Staff will be aware of the following:

26.2.1 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 child's indicators relate only to their disability

26.2.2 Pupils with SEND can be disproportionally impacted by things like bullying, without outwardly showing any signs

26.2.3 Communication barriers may exist, as well as difficulties in overcoming these barriers

26.3 When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.

26.4 When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the trust's/school's SENCO, as well as the pupil's family where appropriate, to ensure that the pupil's needs are effectively met.

27. Alternative Provision

27.1 The Trust will remain responsible for a pupil's welfare during their time at an alternative provider.

27.2 When placing a pupil with an alternative provider, the trust will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

28. Work Experience

28.1 When a pupil is sent on work experience, the trust will ensure that the provider has appropriate safeguarding policies and procedures in place.

28.2 Where the trust has pupils conduct work experience at the trust, an enhanced DBS check will be obtained if the pupil is over the age of 16.

29. Homestay Exchange Visits

School-Arranged Homestays in UK

29.1 Where the trust is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay.

29.2 In such cases, the trust is the regulated activity provider; therefore, the trust will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

29.3 Where criminal record information is disclosed, the trust will consider, alongside all other information, whether the adult is a suitable host.

29.4 In addition to the responsible adults, the trust will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-Arranged Homestays Abroad

29.5 The trust will liaise with partner trusts to discuss and agree the arrangements in place for the visit.

29.6 The trust will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.

29.7 The trust will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange.

29.8 Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately Arranged Homestays

29.9 Where a parent or pupil arranges their own homestay, this is a private arrangement and the trust is not the regulated activity provider.

30. Private Fostering

30.1 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 Trust becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

31. Concerns About a Pupil

31.1 If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or a Deputy.

31.2 All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in section 31 of this policy.

31.3 Where the DSL is not available to discuss the concern with, staff members will contact the Deputy DSL with the matter.

31.4 If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

31.5 The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer.

31.6 Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil.

31.7 If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

31.8 If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered.

31.9 All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded on CPOMS. Any recordings in writing will be kept securely in a locked cabinet in the DSL's office.

31.10 If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately.

31.11 If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

31.12 Where there are safeguarding concerns, the trust will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views.

31.13 When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

31.14 An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

32. Early Help

32.1 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 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 will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

33. Managing Referrals

33.1 The reporting and referral process outlined in Appendix B will be followed accordingly.

33.2 All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.

33.3 When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

33.4 The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved.

33.5 The DSL will work closely with the police to ensure the trust does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

33.6 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.**

33.7 The trust 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 CSCS.

33.8 Where CSCS decide that a statutory investigation is not appropriate, the trust will consider referring the incident again if it is believed that the pupil is at risk of harm.

33.9 Where CSCS decide that a statutory investigation is not appropriate and the Trust agrees with this decision, the trust will consider the use of other support mechanisms, such as early help and pastoral support.

33.10 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.

33.11 Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm.

33.12 The trust will work closely with parents to ensure that the pupil, as well as their family, understands that the arrangements in place, such as in the trust interventions, are effectively supported and know where they can access additional support.

34. Concerns About Staff Members and Safeguarding Practices

34.1 If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the Headteacher.

34.2 If the concern is with regards to the Headteacher, it will be referred to the Chief Executive.

34.3 Any concerns regarding the safeguarding practices at the trust will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.

34.4 If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

34.5 Any allegations of abuse made against staff members, including those that meet the harms test, will be dealt with in accordance with the trust.

34.6 For the purpose of this policy, the "**harms test**" refers to a situation where a person would pose a risk of harm if they continued to work in regular or close contact with pupils in their present position, or in any capacity.

35. Dealing with Allegations of Abuse Against Staff

Refer to the Trust Allegations of Abuse Against Staff Policy.

36. Allegations of Abuse Against Other Pupils (Peer-On-Peer Abuse)

For the purposes of this policy, **"peer-on-peer abuse"** is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including peer-on-peer abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that peer-on-peer 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 peer-on-peer 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 peer-on-peer abuse is not occurring. All staff will speak to the DSL if they have any concerns about peer-on-peer 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".

Sexual Harassment

36.1 Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a pupil's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

36.2 Sexual harassment includes:

36.2.1 Sexual comments

36.2.2 Sexual "jokes" and taunting

36.2.3 Physical behaviour, such as deliberately brushing against another pupil.

36.2.4 Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual Violence

36.3 Sexual violence refers to the three following offences:

36.3.1 **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.

36.3.2 **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.

36.3.3 **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.

36.3.4 Harmful sexual behaviours

36.4 The term "**harmful sexual behaviour"** is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

36.4.1 Using sexually explicit words and phrases

36.4.2 Inappropriate touching

36.4.3 Sexual violence or threats

36.4.4 Full penetrative sex with other children or adults

36.4.5 Sexual interest in adults or children of very different ages to their own

36.4.6 Forceful or aggressive sexual behaviour

36.4.7 Compulsive habits

36.4.8 Sexual behaviour affecting progress and achievement

36.4.9 Using sexually explicit words and phrases

36.4.10 Inappropriate touching

36.4.11 Sexual violence or threats

36.5 Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child may have SEND.

A Preventative Approach

36.6 In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the trust will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.

36.7 The trust will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group

sessions. Such content will be age and stage of development specific, and tackle issues such as the following:

36.7.1 Healthy relationships

36.7.2 Respectful behaviour

36.7.3 Gender roles, stereotyping and equality

36.7.4 LGBTQ+ identities and relationships

36.7.5 Body confidence and self-esteem

36.7.6 Prejudiced behaviour

36.7.7 That sexual violence and sexual harassment is always wrong

36.7.8 Addressing cultures of sexual harassment

36.8 Pupils will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled

Awareness

36.9 All staff will be aware that pupils of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.

36.10 All staff will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.

36.11 All staff will be made aware of the heightened vulnerability of pupils with SEND, who are three times 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.

36.12 LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.

36.13 The trust’s response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.

36.14 Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

Support Available if a Child Has Been Harmed, is in Immediate Danger or at Risk of Harm

36.15 If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to CSCS.

36.16 Within one working day, a social worker will respond to the referrer to explain the action that will be taken.

Support Available if Early Help, Section 17 and/or Section 47 Statutory Assessments are Appropriate

36.17 If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, the trust staff may be required to support external agencies. The DSL and deputies will support staff as required.

Support Available if a Crime May Have Been Committed

36.18 Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSCS. The DSL will be aware of the local process for referrals to both CSCS and the police.

36.19 Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.

36.20 The trust has a close relationship with the local police force and the DSL will liaise closely with the local police presence.

Support Available if Reports Include Online Behaviour

36.21 Online concerns can be especially complicated. The trust recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

36.22 If the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed.

36.23 Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

Managing Disclosures

36.24 Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.

36.25 If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSL.

36.26 Where an alleged incident took place away from the trust or online but involved pupils from the trust, the trust's duty to safeguard pupils remains the same.

36.27 All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage
- Only sharing the report with those necessary for its progression
- Explaining to the victim what the next steps will be and who the report will be passed to

- Recognising that the person the child chose to disclose the information to is in a position of trust
- Being clear about boundaries and how the report will be progressed
- Not asking leading questions and only prompting the child with open questions
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted
- Only recording the facts as the child presents them – not the opinions of the note taker
- Where the report includes an online element, being aware of searching, screening and confiscation advice and UKCCIS sexting advice
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a Deputy as one of the staff members)
- Informing the DSL or Deputy as soon as possible after the disclosure if they could not be involved in the disclosure

36.28 The DSL will be informed of any allegations of abuse against pupils with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

Confidentiality

36.29 The trust will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the trust not to tell anyone about the disclosure, the trust cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

36.30 The DSL will consider the following when making confidentiality decisions:

36.30.1 Parents will be informed unless it will place the victim at greater risk

36.30.2 If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSCS

36.30.3 Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police

36.31 The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

Anonymity

36.32 There are legal requirements for anonymity where a case is progressing through the criminal justice system. The trust will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.

36.33 When deciding on the steps to take, the trust will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

Risk Assessment

36.34 The DSL or a Deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

36.35 Risk assessments will consider:

36.35.1 The victim

36.35.2 The alleged perpetrator

36.35.3 Other children at the trust, especially any actions that are appropriate to protect them

36.36 Risk assessments will be recorded (either on paper or electronically) and kept under review.

Taking Action Following a Disclosure

36.37 The DSL or a Deputy will decide the trust's initial response, taking into consideration:

36.37.1 The victim's wishes

36.37.2 The nature of the incident

36.37.3 The ages and developmental stages of the children involved

36.37.4 Any power imbalance between the children

36.37.5 Whether the incident is a one-off or part of a pattern

36.37.6 Whether the incident is a one-off or part of a pattern

36.37.7 Any ongoing risks

36.37.8 Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare

36.37.9 The best interests of the child

36.37.10 That sexual violence and sexual harassment are always unacceptable and will not be tolerated

36.38 Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.

36.39 For reports of rape and assault by penetration, whilst the trust establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The trust will consider how to keep the victim and alleged perpetrator apart on the trust premises, and

on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

36.40 For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.

36.41 In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

36.42 Where a pupil is found to have been involved in harmful sexual behaviour, e.g. non-consensually sharing indecent imagery of another pupil, the trust will help the pupil to move forward from the incident by supporting them in adopting more positive behaviour patterns and attitudes.

Managing the Report

36.43 The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the trust will speak to the relevant agency to discuss informing the alleged perpetrator.

36.44 There are four likely outcomes when managing reports of sexual violence or sexual harassment:

36.44.1 Managing internally

36.44.2 Providing early help

36.44.3 Referring to CSCS

36.44.4 Reporting to the police

36.45 Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.

36.46 The following situations are statutorily clear and do not allow for contrary decisions:

36.46.1 A child under the age of 13 can never consent to sexual activity

36.46.2 The age of consent is 16

36.46.3 Sexual intercourse without consent is rape

36.46.4 Rape, assault by penetration and sexual assault are defined in law

36.46.5 Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves

Managing Internally

36.47 In some cases, e.g. one-off incidents, the trust may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

Providing Early Help

36.48 The trust may decide that statutory interventions are not required, but that pupils may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent the escalation of sexual violence.

Referral to CSCS

36.49 If a child has been harmed, is at risk of harm or is in immediate danger, the trust will make a referral to CSCS. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSCS.

36.50 The trust will not wait for the outcome of an investigation before protecting the victim and other children.

36.51 The DSL will work closely with CSCS to ensure that the trust's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

36.52 If CSCS decide that a statutory investigation is not appropriate, the trust will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

36.53 If the trust agrees with the decision made by CSCS, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

Reporting to the Police

36.54 Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to CSCS. The DSL and deputies will follow the local process for referral.

36.55 Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the trust to support the child with any decision they take, in unison with CSCS and any appropriate specialist agencies.

36.56 The DSL and Governing Body will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.

36.57 The DSL will be aware of local arrangements and specialist units that investigate child abuse.

36.58 In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the trust will continue to engage with specialist support for the victim as required.

Bail Conditions

36.59 Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.

36.60 The trust will work with CSCS and the police to support the victim, alleged perpetrator and other children (especially witnesses) during criminal investigations. The trust will seek advice from the police to ensure they meet their safeguarding responsibilities.

36.61 The term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.

36.62 Where bail is deemed necessary, the trust will work with CSCS and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.

Managing Delays in the Criminal Justice System

36.63 The trust will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made.

36.64 The DSL will work closely with the police to ensure the trust does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The End of the Criminal Process

36.65 Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the trust will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable.

36.66 The trust will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).

36.67 Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the trust will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The trust will discuss decisions with the victim and offer support.

36.68 The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

Ongoing Support for the Victim

36.69 Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

36.69.1 The terminology the trust uses to describe the victim

36.69.2 The age and developmental stage of the victim

36.69.3 The needs and wishes of the victim

36.69.4 Whether the victim wishes to continue in their normal routine

36.69.5 The victim will not be made to feel ashamed about making a report

36.69.6 What a proportionate response looks like

36.70 Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

36.71 Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.

36.72 The trust will provide a physical space for victims to withdraw to.

36.73 Victims may require support for a long period of time and the trust will be prepared to offer long-term support in liaison with relevant agencies.

36.74 Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.

36.75 If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.

36.76 If the victim does move to another school, the DSL will inform the trust of any ongoing support needs and transfer the child protection file.

Ongoing Support for the Alleged Perpetrator

36.77 Any decisions made regarding the support required for an alleged perpetrator, the trust will be made with the following considerations in mind:

36.77.1 The terminology the trust use to describe the alleged perpetrator

36.77.2 The balance of safeguarding the victim and providing the alleged perpetrator with education and support

36.77.3 The reasons why the alleged perpetrator may have abused the victim – and the support necessary

36.77.4 Their age and developmental stage

36.77.5 What a proportionate response looks like

36.77.6 Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials

36.77.7 What the outcome of the investigation was

36.78 When making a decision, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.

36.79 If the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.

36.80 The trust will work with professionals as required to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the Alleged Perpetrator

36.81 Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the trust reaching its own conclusion and imposing an appropriate penalty.

36.82 The trust will make such decisions on a case-by-case basis, with the DSL taking a leading role. The trust will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.

36.83 The trust will also consider whether circumstances make it unreasonable or irrational for the trust to make a decision about what happened while an investigation is considering the same facts.

36.84 Disciplinary action and support can take place at the same time.

36.85 The trust will be clear whether action taken is disciplinary, supportive or both.

Shared Classes

36.86 Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on the trust's premises and on the trust's transport – balancing the trust's duty to educate against its duty to safeguard. The best interests of the pupil will always come first.

36.87 Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on the trust premises and transport will be prevented.

36.88 Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the trust would harm the education or welfare of the victim and potentially other pupils.

36.89 Where a criminal investigation into sexual assault leads to a conviction or caution, the trust will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the trust, the trust will keep the victim and perpetrator in separate classes and manage potential contact on the trust's premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

36.90 Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

36.91 In all cases, the trust will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with Parents and Carers

36.92 In most sexual violence cases, the trust will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

36.93 The trust will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

36.94 The trust will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a Deputy will attend such meetings, with agencies invited as necessary.

36.95 Clear policies regarding how the trust will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

Safeguarding Other Children

36.96 Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

36.97 It is likely that children will "take sides" following a report, and the trust will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

36.98 The trust will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

36.99 As part of the trust's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

37. Communication and Confidentiality

37.1 All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the trust's data protection policies.

37.2 Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the trust will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.

37.3 Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the trust will do all it can to protect the anonymity of the pupils involved in the case.

37.4 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.

37.5 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.

37.6 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.

37.7 Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others.

37.8 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.

37.9 Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved.

37.10 Discussions with parents will not take place where they could potentially put a pupil at risk of harm.

37.11 Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.

37.12 Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, etc., with the reasons behind decisions being explained and the available support discussed.

37.13 External agencies will be invited to these discussions where necessary.

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

37.15 Where a pupil is leaving the trust, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

38. Online Safety

Refer to the Trust Online Safety Policy.

39. Mobile Phone and Camera Safety

39.1 Staff members will not use personal mobile phones or cameras when pupils are present.

39.2 Staff may use mobile phones on the trust's premises outside of working hours when no pupils are present.

39.3 Staff may use mobile phones in the staffroom during breaks and non-contact time.

39.4 Mobile phones will be safely stored and in silent mode whilst pupils are present.

39.5 Staff will use their professional judgement in emergency situations.

39.6 Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when pupils are present.

39.7 Mobile devices will not be used to take images or videos of pupils or staff in any circumstances.

39.8 The sending of inappropriate messages or images from mobile devices is strictly prohibited.

39.9 Staff who do not adhere to this policy will face disciplinary action.

39.10 Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the trust's Data Protection Policy.

39.11 The DPO will advise over the planning of any events where photographs and videos will be taken.

39.12 Where photographs and videos will involve LAC pupils, adopted pupils, or pupils for whom there are security concerns, the Headteacher will liaise with the DSL to determine the steps involved.

39.13 The DSL will, in known cases of a pupil who is a LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.

39.14 Staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy and the Allegations of Abuse Against Staff Policy.

Upskirting

39.15 Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

39.16 A "specified purpose" is namely:

39.16.1 Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear)

39.16.2 To humiliate, distress or alarm the victim

39.17 "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

39.18 Upskirting will not be tolerated by the trust.

39.19 Any incidents of upskirting will be reported to the DSL who will then decide on the next steps to take, which may include police involvement.

40. Sports Clubs and Extracurricular Activities

40.1 Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the trust to effectively safeguard pupils and adhere to local safeguarding arrangements.

40.2 Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of pupils.

40.3 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.

40.4 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.

41. Safer Recruitment

The Trust's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

41.1 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:

41.1.1 Are responsible on a daily basis for the care or supervision of children

41.1.2 Regularly work in the trust at times when children are on the premises

41.1.3 Regularly come into contact with children under 18 years of age

41.2 The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

41.3 The governing board will conduct the appropriate pre-employment checks for al prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

41.4 The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

Pre-employment Checks

41.5 The Governing Body will assess the suitability of prospective employees by:

41.5.1 Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available

41.5.2 Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity

41.5.3 Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available

41.5.4 Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the TRA Teacher Services' System

41.5.5 Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role

41.5.6 Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed

41.5.7 If the person has lived or worked outside the UK, making any further checks that the trust considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed

41.5.8 Checking professional experience, QTS and qualifications as appropriate using Teacher Services

41.5.9 Confirming that an individual taking up a management position is not subject to a section 128 direction

41.6 An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

Internal Candidates

41.7 If an individual moves from a position within the trust that did not involve the provision of education to one that does, it will be treated as if the individual were a new member of staff and all required pre-appointment checks will be carried out.

41.8 References from internal candidates will always be scrutinised before appointment.

ITT candidates

41.9 Where applicants for ITT are salaried by the trust, the trust will ensure that enhanced DBS checks with barred list information are carried out.

41.10 Written confirmation will be obtained to ensure that an enhanced DBS certificate and barred list check has been carried out for all fee-funded trainees.

Governors/Trustees

41.11 The trust requires enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees.

41.12 Before an individual becomes a Trustee, the trust will carry out an enhanced DBS check and confirm their identity.

41.13 Where a Trustee also engages in any regulated activity, a barred list check will also be requested.

41.14 An additional check is required for those in management positions, to ensure that they are not prohibited under section 128 provisions. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check.

41.15 If the individual lives or has lived outside of the UK, consideration will be given as to further checks that may be necessary.

41.16 The Chair of Trustees will complete a suitability check with the ESFA as soon as they are appointed.

41.17 To process a suitability check, the Chair of Governors will provide the EFSA with:

41.17.1 Information about their identity verified by a recognised professional, using the EFSA's verification form.

41.17.2 Information confirming their right to work in the UK.

41.17.3 The outcome of an enhanced DBS check.

41.17.4 An overseas criminal record check or certificate of good character if they have lived outside of the UK.

Those Who Have Lived or Worked Outside of the UK

41.18 For those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.

Barred List Check

41.19 An enhanced DBS check may be requested for anyone working in the trust that is not in regulated activity but does not have a barred list check.

41.20 If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.

41.21 Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

References

41.22 References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

41.23 References will only be accepted from a senior person and not from a colleague.

41.24 References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.

41.25 References will be obtained prior to interviews taking place and discussed during interviews.

41.26 Open testimonials will not be considered.

41.27 Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

41.28 Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

Volunteers

41.29 No volunteer will be left unsupervised with a pupil or allowed to work in regulated activity until the necessary checks have been obtained.

41.30 An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.

41.31 Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.

41.32 A supervised volunteer who regularly teaches or looks after children is not in regulated activity.

41.33 The trust will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.

41.34 Unless there is cause for concern, the trust will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.

41.35 A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

Associate Members

41.36 Associate members (i.e. individuals that are appointed by the Governing Body to serve on one or more committees) will not be required to obtain enhanced DBS checks.

Contractors

41.37 The trust will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.

41.38 Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

41.39 Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the trust.

Data Retention

41.40 DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.

41.41 A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

Referral to the DBS

41.42 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.

Ongoing Suitability

41.43 Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

42. Single Central Record (SCR)

Refer to our Trust's Single Central Record of Recruitment and Vetting Checks Policy.

43. Staff Suitability

43.1 All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.

43.2 A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them
- Have committed certain offences

43.3 All staff members are required to sign the declaration form provided in the appendices of this policy confirming that they are not disqualified from working in a schooling environment.

43.4 A disqualified person will not be permitted to continue working at the trust, unless they apply for and are granted a waiver from Ofsted. The trust will provide support with this process.

44. Training

44.1 Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated on a termly basis or whenever there is a change in legislation.

44.2 The induction training will cover:

44.2.1 The Child Protection and Safeguarding Policy

44.2.2 The Peer-on-Peer Abuse Policy and procedures.

44.2.3 The Behavioural Policy

44.2.4 The Staff Code of Conduct

44.2.5 Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).

44.2.6 The Children Missing Education Policy, including the safeguarding response to children who go missing from education.

44.2.7 Appropriate child protection and safeguarding training, including online safety training.

44.2.8 The identity of the DSL and any deputies

44.2.9 The role of the DSL and Deputy DSLs

44.3 All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

44.3.1 The issues surrounding sexual violence and sexual harassment.

44.3.2 Contextual safeguarding.

44.3.3 How to keep LAC and PLAC safe.

44.3.4 Child criminal exploitation and the need to refer cases to the National Referral Mechanism.

44.3.5 Updated online safety training.

44.4 Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the trust.

44.5 The DSL and deputy DSL(s) will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSL(s) will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

44.5.1 The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.

44.5.2 How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.

44.5.3 The importance of providing information and support to CSCS.

44.5.4 The lasting impact that adversity and trauma can have.

44.5.5 How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.

44.5.6 The importance of internal and external information sharing.

44.5.7 The Prevent duty.

44.5.8 The risks associated with online safety, including the additional risks faced online by pupils with SEND.

45. Monitoring and Review

45.1 This policy is reviewed at least annually by the Director of Safeguarding, DSL and the headteacher. 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 by the will be communicated to all members of staff.

45.2 All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

45.3 The next scheduled review date for this policy is September 2022.

APPENDIX 1
Safeguarding During the Coronavirus (COVID-19) Pandemic
Statement of intent

We understand that we face a time of great uncertainty and, as a trust, we are doing all we can to provide clarity and safety to the trust community. This appendix includes provisions which the trust will have due regard for during the coronavirus pandemic. The information in this section is under constant review and is updated to reflect changes to government and local guidance as it is released.

During the period of national lockdown, the school will allow only vulnerable pupils and the children of critical workers to attend. All other pupils will not attend on-site provision and will learn remotely until February half term.

1.Key Definitions

1.1 For the purpose of this policy, the following definitions will be utilised:

- **Children of Critical Workers:** critical workers are defined by the government as parents whose work is critical to the coronavirus (COVID-19) and EU transition response and includes those who work in health and social care and in other key sectors as outlined below:
    - Health and social care, e.g. doctors and nurses, social workers and care workers
    - Education and childcare, e.g. teachers, DSLs and support staff
    - Key public services, e.g. the justice system, frontline workers in public services and charities
    - Local and national government, e.g. administrative occupations essential to the effective delivery of the coronavirus (COVID 19) response, and the delivery of and response to EU transition, as well as essential public services
    - Food and other necessary goods, e.g. those involved in food production, processing, distribution, sales and delivery
    - Public safety and national security, e.g. police and ministry of defence workers
    - Transport, e.g. those who will keep the air, water, road and rail passenger and freight transport modes operating during the coronavirus (COVID-19) response and EU transition
    - Utilities, communication and financial services, e.g. bankers, oil workers, and telecommunications (999 and 111 critical services and postal workers)

- **Vulnerable Children:** children who:
    - Are supported by social care
    - Are on the edge of receiving support from social care

- Have safeguarding and welfare needs
- Have child in need plans
- Have child protection plans
- Are LAC
- Are young carers
- Are disabled
- Have an EHC plan
- Are adopted
- Are living in temporary accommodation
- Are at risk of becoming not in education, employment, or training (NEET)
- Are assessed as otherwise vulnerable by education providers or LAs
- May have difficulty engaging with remote education at home (for example due to a lack of devices or quiet space to study).
- Are care leavers
- Are care leavers
- Are at the school and LA's discretion including pupils and students who need to attend to receive support or manage risks to their mental health

A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

2. The Role of the DSL and their Deputies

2.1 In light of the current pandemic, the trust will have additional measures in place to ensure the safety and wellbeing of its pupils – this approach will be led by the DSL.

2.2 Wherever possible, the trust will endeavour to have a trained DSL or their Deputy on-site while all pupils are attending the trust.

2.3 In circumstances where, due to operational challenges, it is not possible to have a trained DSL or deputy on-site, for example when working from home, a trained DSL (or Deputy) from the trust, or, where necessary, a partner, will be available to be contacted via phone or online video.

2.4 Where a DSL or Deputy are unavailable on site, e.g. due to illness, a member of the SLT will take responsibility for coordinating safeguarding within the trust. Their role will include:

- Updating and managing access to child protection files
- Liaising with the offsite DSL or Deputy
- Liaising with children's social care services where required

2.5 During the national lockdown, the DSL and their Deputy will be responsible for:

- Sharing their time and resources with other academies, where necessary

- Ensuring staff are kept up-to-date with the latest safeguarding information and developments, including via the safeguarding partners, newsletters and professional advice groups
- Being responsible for amending Appendix A (this section) in line with the continual changes to education policy released by the DfE and communicating all changes to staff and volunteers
- Working with the VSH and wider LA to protect vulnerable children
- Providing support to teachers and pastoral staff to ensure that contact is maintained with pupils at home and their families
- Ensuring staff are aware of reporting channels for safeguarding concerns
- Ensuring there is a consistent approach to safeguarding children throughout the coronavirus pandemic
- Speaking to pupils directly where possible to identify any concerns and ensuring pupils are provided with clear communication channels so they can report any concerns they have, including reports of peer-on-peer abuse
- Providing all volunteers and volunteer staff with copies of this policy
- Identifying a suitable member of the SLT to assume the role of temporary DSL should both themselves and their deputies become unable to work, e.g. due to illness
- Sharing their contact information with the trust community
- Identifying vulnerable children and communicating additional safeguarding provisions to pupils and their families

2.6 The DSL will report back to the Governing Body on all relevant safeguarding concerns.

2.7 The DSL will work with the local safeguarding partners and relevant agencies and services to identify harm and ensure pupils are appropriately supported.

2.8 Where pupils are required to return to remote learning, e.g. they must self-isolate or the school is required to limit attendance, the DSL will ensure that they, and other members of staff, exercise extra vigilance to ensure pupils remain safe while learning at home.

2.9 The trust/school will ensure that the DSL and their deputies are given sufficient time and assistance to support staff and pupils with new safeguarding and welfare concerns and to handle referrals to relevant agencies where appropriate.

2.10 All online or telephone communication will be made using the trust accounts or telephone numbers. If any staff need to use their personal number, this is withheld.

3. Attendance

3.1 From 8 March 2021, attendance will be mandatory and the school will have the power to issue fines for unauthorised absence – this will only be used as a last resort.

3.2 The trust will resume its regular attendance register to record attendance after fully opening.

3.3 The trust will follow up on absences of pupils who are expected to be in school but where a parent wished for their child to be absent. The DSL or Deputy DSL will discuss

any concerns parents may have and work with them to achieve the best possible outcome for the pupil.

3.4 Parents will not be penalised if their child does not attend school due to following clinical or public health advice to stay at home. Pupils will engage in remote learning where they are unable to attend school for reasons related to coronavirus, provided they are well enough to do so.

3.5 For those children not attending the trust premises and learning remotely at home, the trust will ensure that appropriate systems for checking attendance and levels of pupil engagement each day are in place, and work with families to rapidly identify effective solutions where engagement is a concern.

3.6 The trust will ensure that all pupils' emergency contact information is correct and encourage parents to provide as many contact numbers as possible.

3.7 If the school/trust must limit attendance at any point, e.g. due to a local increase in coronavirus cases, in line with DfE restrictions, the school/trust will ensure that priority to attend full time is given to vulnerable pupils and the children of critical workers.

4. Staff Training and Safeguarding Induction

4.1 The trust will ensure that all existing trust staff have read part one of the most up-to-date version 'Keeping children safe in education' (KCSIE) and are suitably trained in this policy and any local safeguarding arrangements.

4.2 The DSL and Headteacher will risk assess any volunteers or staff from other schools/trusts to determine their suitability to work with children.

4.3 Under no circumstances will volunteers who have not been checked be left unsupervised or allowed to work in regulated activity.

4.4 The DSL and Headteacher will ensure any volunteers or staff from other schools/trusts are suitably trained in safeguarding and ensure that they have read the relevant sections of KCSIE, are aware of the trust's safeguarding policy and procedures, and any additional local safeguarding arrangements.

4.5 The DSL and Headteacher will use their professional judgement to assess how much additional safeguarding training temporary staff or volunteers require.

4.6 The trust will follow safer recruitment processes, in line with the relevant policies, when acquiring new staff.

4.7 New staff or volunteers will continue to be provided with a safeguarding induction and the most up-to-date copy of this policy.

4.8 Individuals who have not undergone suitable DBS checks will not be left unattended with pupils.

4.9 The trust will carry out a check on any existing staff who cause a concern.

4.10 All staff will receive updates from the DSL regarding confirmation of local safeguarding processes and confirmation of the DSL and their Deputy's arrangements, e.g. working schedule and contact information.

4.11 The trust will report individuals who they consider a safeguarding risk to the Teaching Regulation Agency (TRA) by emailing Misconduct.Teacher@education.gov.uk – all referrals received by the TRA will continue to be considered but hearings may not be scheduled for the current time.

4.12 During the period of partial closure, the trust will have a rota system which allows the Headteacher to be aware of who will be on the premises at any one given time.

4.13 The trust will ensure the SCR is kept up-to-date in line with KCSIE. The SCR will be used as a record of attendance for staff and volunteers as well as a log of any risk assessments carried out on volunteers and staff on loan from other schools/trusts.

5. Online Safety and Security

5.1 The trust will continue to ensure that appropriate filters and monitoring systems are in place to protect pupils when they are online on the trust's IT systems, whether in school or at home.

5.2 All online programmes used will be checked to ensure they are reputable and GDPR compliant.

5.3 The ICT technician will work to ensure any loaned devices are secure and have the necessary antivirus malware protection downloaded.

5.4 Any online queries which require the ICT technician will be addressed over the phone or online as much as possible – face-to-face contact is kept to a minimum.

5.5 The DSL will report back to the Governing Body how they are ensuring pupils remain safe online during partial trust closure.

5.6 Pupils will report any suspicious online activity they encounter to the DSL or Headteacher.

5.7 Staff will adhere to the Staff Code of Conduct at all times when delivering education online.

5.8 Staff will continue to look out for signs of a child being at risk online and report concerns over a pupil's safety online to the DSL. Where relevant, the DSL will make referrals to the police and children's social care.

5.9 The trust will collaborate with parents to reinforce the importance of online safety, and encourage parents to set age-appropriate parental controls on digital devices and use internet filters to block malicious websites.

5.10 Pupils will be provided with useful information and contact details of individuals and organisations they can turn to should they feel unsafe online, e.g. Childline or the UK Safer Internet Centre.

6. Mental Health and Pastoral Care

6.1 The trust understands how the coronavirus pandemic can cause pupils and staff to feel anxious and concerned and will offer any essential support required to those in need.

6.2 Staff will be aware that some pupils may return to school having experienced difficulties over the period of lockdown, including bereavement, mental illness and welfare harms, and will be vigilant with regards to indicators that a pupil requires support.

6.3 The Headteacher will encourage Line Managers to hold one-to-one meetings with their staff to ensure they feel supported during this stressful time.

6.4 Pupils will be provided with different resources they can access to help them cope with their mental health, including Childline and other online services.

6.5 Face-to-face support will only be provided where two-metre social distancing can be adhered to.

6.6 The trust will have due regard when identifying early signs of mental health issues in pupils.

6.7 Teachers will have due regard for the negative impact the current pandemic may have had on pupils, especially when setting expectations for pupils' work.

6.8 Pastoral support will be offered to any family who requires it.

6.9 The trust will utilise funding from the DfE's Wellbeing for Education Return programme.

6.10 For pupils who are receiving education at home, the trust will follow set timetables to provide parents and pupils with familiar structure that includes time for education, playing and relaxing.

6.11 The trust will consider one-to-one support for those who may benefit the most from it, e.g. for pupils with SEND.

7. Remote Education

7.1 Teachers will plan online lessons with the safety of pupils in mind.

7.2 Staff communicating with pupils or parents via videocall will do so from within the trust, or from a quiet room with a neutral background if working from home.

7.3 Teachers will ensure all online planning processes for pupils who are working online will have clear reporting routes to the trust and external agencies so they can raise concerns whilst online.

7.4 The trust will collaborate with the LA where possible when planning online lessons and activities, and considering online safety.

7.5 The DSL will ensure every pupil has their contact information so they know how they can contact them about any safeguarding concern.

7.6 Pupils will be provided with online safety information by their teacher.

7.7 Pupils will be directed to practical online support, such as Childline, where they feel unsafe and require support outside of the trust.

7.8 Parents will be given a list of websites their child may access and any information regarding online sessions with staff that their child will be participating in.

7.9 Parents will be provided with the contact details of the DSL so they can report any concerns.

7.10 When communicating online, staff will:

- Communicate within school hours as much as possible
- Communicate through the trust channels approved by the SLT
- Use trust email accounts over personal accounts wherever possible.
- Use trust devices over personal devices wherever possible.
- Not share personal information.

8. Peer-On-Peer Abuse

8.1 The DSL will implement robust reporting procedures for peer-on-peer abuse and communicate these to all staff, pupils and parents.

8.2 Reports made regarding peer-on-peer abuse will be risk assessed by the DSL on a case-by-case basis and, where required, investigated immediately and reported to the relevant authority, e.g. the police or children's social care services (CSCS) where required.

8.3 Both the alleged perpetrator and victim will be provided with support whilst the report is being investigated.

8.4 Pupils will be provided with the contact details of relevant bodies who can provide support to them during this time, e.g. Childline.

8.5 The DSL will keep the victim, the alleged perpetrator and their families up-to-date where necessary with details of the investigation, including the conclusion and how appeals can be made.

8.6 Individuals will be given a copy of the trust's amended Complaints Procedures Policy to assist them with the appeals process.

8.7 Communications will be made online or by telephone unless face-to-face contact is unavoidable.

9. Pupils Moving Schools

9.1 Where trust pupils are moving to another setting, the trust will continue to do whatever they reasonably can to provide the receiving institution with any relevant welfare and child protection information.

9.2 The DSL will ensure that the receiving school has access to pupils' EHC plans, child in need plans, child protection plans or, for LAC, their personal education plan, and is informed who the child's social worker is (and, for LAC, who the responsible VSH is).

Staff Disqualification Declaration (to be used at staff induction and kept in personnel file)

Name of School:	
Name of staff member:	Position:

Orders and other restrictions	Yes/No
Have any orders or other determinations related to childcare been made in respect of you?	
Have any orders or other determinations related to childcare been made in respect of a child in your care?	
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?	
Are you barred from working with children by the DBS?	
Are you prohibited from teaching?	
Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
• Any offence against or involving a child?	
• Any violent or sexual offence against an adult?	
• Any offence under The Sexual Offences Act 2003?	
• Any other relevant offence?	

Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?	

Provision of information

If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.

Details of the order restriction, conviction or caution:

The date(s) of the above:	
The relevant court(s) or body/bodies):	

You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions/convictions, a DBS Certificate may be provided.

Declaration

In signing this form, I confirm that the information provided is true to the best of my knowledge and that:

- I understand my responsibilities to safeguard children.
- I understand that I must notify my Headteacher immediately of anything that affects my suitability to work within The Omega Multi-Academy Trust. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children.

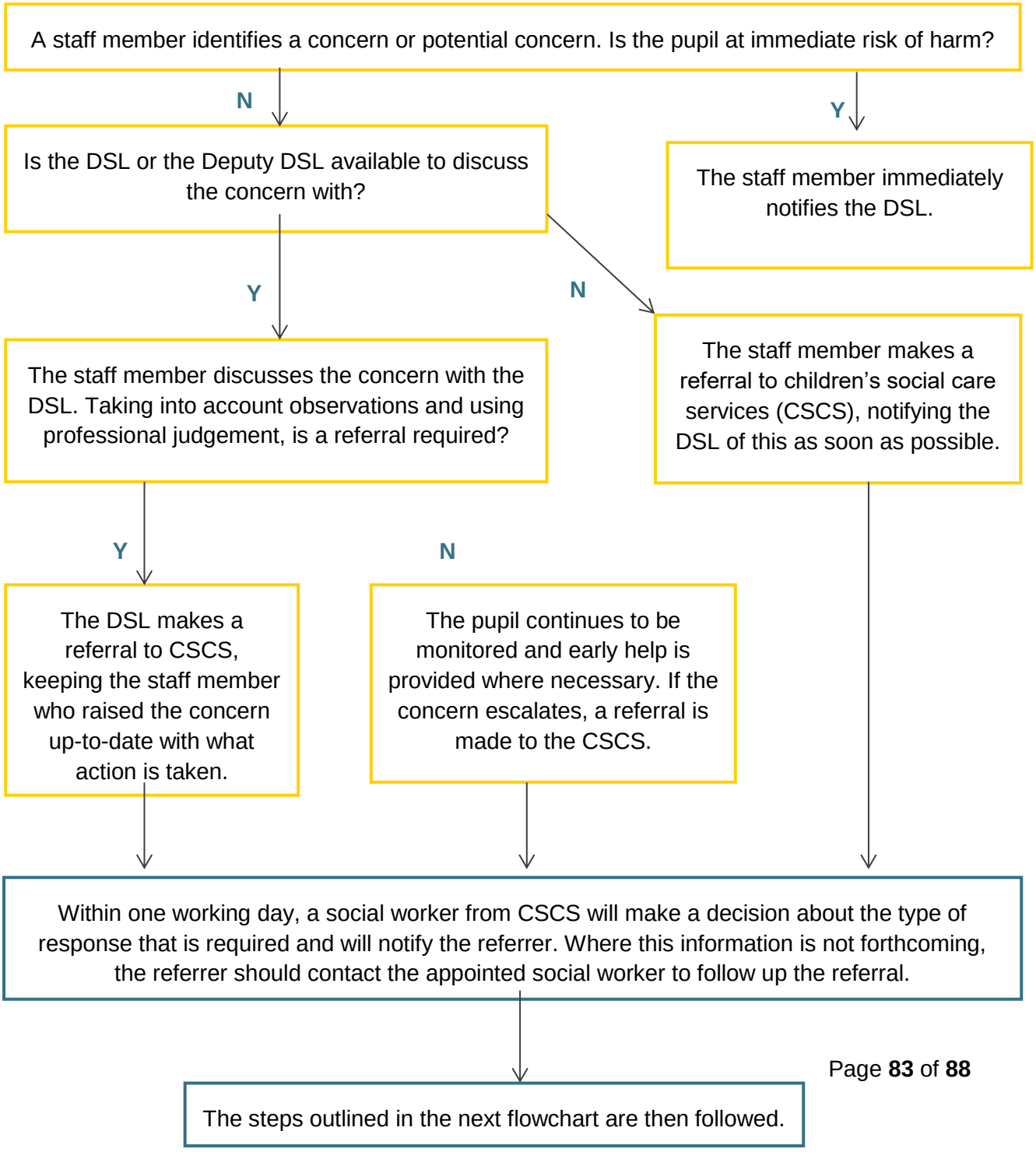
Signed:	
Print name:	
Date:	

Safeguarding Reporting Process

The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed.

The actions taken by The Omega Multi-Academy Trust are outlined in yellow, whereas actions taken by another agency are outlined in blue.

Before a referral is made



After a referral is made

Once a referral has been made, a social worker from CSCS will notify the referrer that a decision has been made and one of the following responses will be actioned.

The pupil is in need of immediate protection.

Where the pupil is at risk of significant harm but is not in immediate danger, a strategy discussion is held.

No formal assessment is needed.

Where appropriate to do so, the DSL and staff member who raised the concern may be consulted during these stages to ensure that all areas of concern are addressed.

The DSL supports the initial staff member to liaise with other agencies to arrange an early help assessment and appropriate support.

Appropriate emergency action is taken by the social worker, police or NSPCC.

A Child in Need assessment is completed within 45 working days.

Within 15 working days of the strategy discussion, an initial child protection conference is held.

A child protection plan is potentially required.

The type of support needed is identified, arranged through multi-agency liaison and provided effectively.

Staff keep the pupil's circumstances under review and re-refer if appropriate to ensure circumstances improve – the pupil's best interests always come first.

If the child's situation does not appear to be improving, the DSL should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Contacts and Advice

Expert organisations

- Barnardo's
- Lucy Faithfull Foundation
- NSPCC
- Rape Crisis
- University of Bedfordshire: Contextual Safeguarding
- UK Safer Internet Centre

Support for victims

- Anti-Bullying Alliance
- MoJ Victim Support
- Rape Crisis
- The Survivor's Trust
- Victim Support

Toolkits

- Brook
- NSPCC
- Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire

Further information on confidentiality and information sharing

- Gillick Competency Fraser Guidelines
- Government Information Sharing Advice
- Information Commissioner's Office: Education
- NSPCC: Things to Know and Consider

Further information on sexting

- UK Council for Child Internet Safety: Sexting Advice
- London Grid for Learning – Collection of Advice

Support for parents

- Parentzone
- Parentsafe – London Grid for Learning
- CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact
- CEOP Thinkuknow – Supporting Positive Sexual Behaviour

Academy Specific Contacts

Director of Safeguarding – Omega Multi-Academy Trust
Mrs J Malone
Jan.Malone@omegamat.co.uk
01925 988 330

Great Sankey High School

DSL	**Mrs R Bond** Assistant Headteacher	Rhianne.Bond@greatsankey.org	01925 724 118
Deputy DSL	**Miss Stephanie Miller** Dept DSL	Stephanie.Miller@greatsankey.org	01925 724 118
DS Governor	**Mr M Platt**		

Burtonwood Community Primary School

DSL	**Mrs H Muttock** Headteacher	HeatherMuttock@omegamat.co.uk	01925 224 072
Deputy DSL	**Mrs S Ignatius** Deputy Headteacher	Sarah.Ignatius@omegamat.co.uk	01925 224 072
DS Governor	**Mrs L Hope**		

Chapelford Village Community High School

DSL	**Mrs J Hewson** Headteacher	Chapelford_head@omegamat.co.uk	01925 712 554
Deputy DSL	**Mrs L Tottie** Deputy Headteacher	Chapelford_Deputy@omegamat.co.uk	01925 712 554
DS Governor	**Mrs Worrall**		

Park Road Community Primary School

DSL	**Mrs N Parkinson** Headteacher	Parkroad_head@omegamat.co.uk	01925 723 550
Deputy DSL	**Mrs C Quigley** Deputy Headteacher	Parkroad_Deputy@omegamat.co.uk	01925 723 550
DS Governor	**Mr P Finch**		

Westbrook Old Hall Primary School

DSL	**Mr S Quinn** Headteacher	Oldhall_primary_head@omegamat.co.uk	01925 415 544
Deputy DSL	**Mrs L Johnson**	l.johnson@westbrookoldhall.com	01925 415 544
DS Governor	**Mrs A Carr**		

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