Cleethorpes Academy

Child Protection and Safeguarding Policy and Procedures

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To make changes to this policy, please email admin@lincolnshiregateway.co.uk.

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1 Aims and important contacts

It is essential that everybody working in Cleethorpes Academy understands their safeguarding responsibilities. All staff who work at the Academy have read at least Part one of the statutory KCSIE25 guidance enabling all staff to safeguard and promote the welfare of children. Staff training and updates regularly support staff to understand and discharge their roles and responsibilities as set out in Part one of the KCSIE 25 guidance.

The Academy sets out three key aims:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

This Academy plays a vital role in the wider safeguarding system for children. No single practitioner can have the full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

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

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcome

Role	**Name, email, telephone number and online referral link**
Cleethorpes Academy Designated Safeguarding Lead (DSL)	Victoria Watts wattsv@cleethorpesacademy.co.uk 01472 582310
Cleethorpes Academy Deputy Designated Safeguarding Lead (DDSL)	Sarah White WhiteS@cleethorpesacademy.co.uk 01472 582310
Cleethorpes Academy Deputy Designated Safeguarding Lead (DDSL)	Maya Brett BrettM@cleethorpesacademy.co.uk 01472 582310
Mental Health Champion	Victoria Watts – as above
Safeguarding Trustee/Link Governor	Jane Aukett AukettJ@LinconshireGateway.co.uk 01507 353450
Local Designated Safeguarding Officer (LADO)	Jodie Turner LADO@nelincs.gov.uk 01472 326118
Director of Children and Family Services North East Lincolnshire Council	Ann-Marie Matson Ann-Marie.Matson@nelincs.gov.uk 01472 329262
Referral and Response / Front Door services/ MASH Team (Emergency Duty Team)	Integrated Front Door 01472 326292
Safeguarding Advisor: (NEL Safeguarding Children Partnership Board Manager)	Helen Willis helen.willis@nelincs.gov.uk 01472 326375
CME Team (Children Missing Education)	School Admissions and CME Team childrenmissingfromeducation@nelincs.gov.uk 01472 326291 (option 4)

CSE Team (Child Sexual Exploitation)	Emily Scott emily.scott@nelincs.gov.uk 01472 325415
Prevent Local Contact	Humberside Prevent Team precent@humberside.pnn.police.uk
Local Policing Link	PC Dan Mosley Croft Baker | Your area | Humberside Police
School Nursing team	School nursing | NELC schoolnursingadvice@nelincs.gov.uk 01472 323660
Sexual Health Team	NLiSH :: LiSH 01522309309 Text – 07520649893 Young people's sexual health | NELC 0300 330 1122
Drug and Alcohol Services	With you Drug and Alcohol Support | WithYou 01472 806890
Mental Health support	Child and Adolescent Mental Health Services (Young Minds Matter) :: Navigo 01472 256256 option 3 Text – orange to 85258

2 Legislation and statutory guidance

This policy is formed from the Department for Education's statutory guidance, Keeping Children Safe in Education September 2025 and Working Together to Safeguard Children (2023), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners. This policy also complies with the now statutory Working Together to Improve School Attendance guidance.

This policy is also based on the following legislation:

Section 175 of the **Education Act 2002**, which places a duty on academies and local authorities to safeguard and promote the welfare of students

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

Part 3 of the schedule to the **Education (Independent Academy Standards) Regulations 2014**, which places a duty on academies to safeguard and promote the welfare of students at the Academy

The Children Act 1989 (and **2004 amendment**), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the **Serious Crime Act 2015,** which places a statutory duty on teachers to report to the Police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the **Safeguarding Vulnerable Groups Act 2006**, which defines what 'regulated activity' is in relation to children

Statutory guidance on the Prevent duty, which explains academies' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our Academy to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment.

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

The Childcare (Disqualification) and Childcare (Early Years Provision free of charge) (Extended Entitlement) (Amendment) Primary Academies Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations" and Childcare Act 2006 which set out who is disqualified from working with children.

This policy also complies with our Funding Agreement and Articles of Association.

3 Definitions

Safeguarding and promoting the welfare of children means:

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

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

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced imagery) is where children share nude or semi-nude images, videos or live streams.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos).

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

4 Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognizing, or disclosing it. We are committed to anti-discriminatory practice and recognize, children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities (see Section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
  Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are Looked After or previous Looked After (see Section 11).
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home-educated.

5 Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the Academy and is consistent with the procedures of the 3 safeguarding partners in North East Lincolnshire. Our policy and procedures also apply to extended Academy and off-site activities.

The Academy plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy

- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, **Keeping Children Safe in Education**, and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the staff behaviour policy and the role of the designated safeguarding lead (DSL) and deputies, the Behaviour Policy and the safeguarding response to children who go missing from education.
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority Children's Services and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection.

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

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the leadership team and takes on the lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during Academy hours for staff to discuss any safeguarding concerns. Out of school hours the DSL and deputies will be contactable on their work mobile phones.

When the DSL is absent, the (deputy/deputies) – will act as cover.

DSL Cleethorpes Academy is Miss V Watts. The Deputies are Mrs S White and Mrs M Brett.

If the DSL and deputies are not available, contact the Principal at the Academy.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority Children's Services, Channel programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.

The DSL will also:

- Keep the Principal informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the Academy's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in case of a police investigation or search.

The full responsibilities of the DSL and Deputies are set out in their job description.

5.3 The Governing Body

The Governing Body will approve this policy at each review, and hold the Principal to account for its implementation. They will also:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our Academy's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
    - The Academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the hard threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure

- That this policy reflects children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognized
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the Academy roll);
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the Academy about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the Academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate (see appendix 3).

All Governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The Principal

The Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction and they understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents when their child joins the Academy and via the Academy website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

5.5 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children in kinship care.

They should also identify and engage with key professionals, eg DSLs, SENCOs, social workers, mental health leads and others.

6 Confidentiality

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data' the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

- If a victim asks the Academy not to tell anyone about the sexual violence or sexual harassment:
    - There is no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonable can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3.

Staff, governors and trustees will use the DFE's data protection guidance to help:

- Comply with data protection law
- Develop data policies and processes
- Know what staff and pupil data to keep
- Follow good practices for preventing personal data breaches

7 Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to Children's Services and/or the Police immediately if you believe a child is suffering or likely to suffer harm, or in immediate danger. Anyone can make a referral. Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

North East Lincolnshire

MASH (Including out of hours)	Tel: 01472 326292

Lincolnshire

Safeguarding of Children Concerns	Tel: 01522 782111
Out of hours (safeguarding referrals)	01522 782333

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to Children's Services and/or the Police directly (see 7.1), and tell the DSL as soon as possible that you have done so.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognize their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision', or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be a risk, are set out in appendix 4.

Any teacher who either:
Is informed by a child under 18 that an act of FGM has been carried out on them: or
Observes physical signs which appear to show that an act of FGM has been carried out on a child under 18 and they have no reason to believe that that act was necessary for the child's physical or mental health or for purposes connected with labor or birth.

Must immediately report this to the police, **personally**. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve Children's Services as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **child under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or

likely to suffer from harm, or is in immediate danger)

Figure 1 on page 14 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority Children's Services. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority Children's Services directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

The Academy has a responsibility to report relevant safeguarding concerns to the local authority children's services. This is done in a number of ways including:

- A call to Children Services to speak to a Social Worker without giving a client/patient identifier in order to plan a course of action, this could include informing the police and retaining the child at the Academy.
- Calling Children Services to discuss an open case with the allocated social worker
- Completion of an Early Help Assessment.
- Out of hours service between 17:00 and 08:30 in an EMERGENCY situation.

The DSL at the Academy will keep a record of all communications between Children's Services and the Academy and any other relevant paperwork.

Cleethorpes Academy will provide early help as soon as possible, when appropriate and in some cases with the support of external services. As defined in Paragraph 497 of KCSIE, early help will provide 'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of the problem getting worse'. This is reflected in the working together to safeguard children guidance.

Early Help/Team around a Child (TAC)

Early Help is put in place when a child requires further support to meet development milestones and/or achieve expected outcomes. He/she has specific additional needs which can be addressed by one or more agencies working in partnership with the child, young person and their family.

An Early Help Assessment will be investigated where a child is frequently missing/goes missing from education, home and/or care and who have experienced multiple suspensions, or as at risk of being permanently excluded from the academy.

Children who have a parent/carer in custody, or who is affected by parental offending will also have access to Early Help support.

A comprehensive list of indicators that a child may need early help can be found in the Working together to safeguard children guidance.

All children need a strong support network of people that care about them to feel safe, secure, and valued. At times families may need additional support from professionals, which will create a Team around a child or TAC. A TAC meeting can take place when there are two or more professionals/services involved. The family will be center of the process in the identification of professionals/services which will need to be part of the TAC in order to support them.

The lead professional with explain the role of the TAC to the family and the role of each professional/agency will play in the process. The lead professional with promote good working

relationships based on trust and transparency.

The TAC will work together in an open and honest way so that they can identify the needs of the child, young person and their family and provide best solutions/interventions to target areas of concerns.

Once best solutions/interventions are identified the TAC will set SMART targets that everyone can work towards. These targets will identify the best placed person/service to address a particular need.

Referral

The academy will offer an Early Help/Team around a Child to any family who has been identified as needing the additional support on relation to their child or family general.

An Early Help Assessment form and action plan will be completed with a professional (in some cases this will be a member of the Academy Safeguarding Team) to identify all areas of need. This must be done with parental consent and their input into the process. This will then be heard by the Early Help and children's social care decision making panel. If successful, an Early Help Worker may be allocated and will work with the family, signposting relevant support mechanisms.

Early Help Assessments are completed and sent to the local authority dedicated team.

The EHA will be reviewed within 6 weeks of starting. At this review, targets will be discussed and reviewed by all members. One of three outcomes would assure:

All targets are met. The TAC would close and the family would return to accessing Universal Services
More work needs to be completed at TAC level, targets are reviewed and further review meeting is set for 6 weeks
More complex needs are identified and the family need additional support at Early Help level.

The Academy has a Link worker allocated from the local authority to support with all TAC cases.

If it is appropriate to refer the case to local authority Children's Services or the Police, the DSL will make the referral or support you to do so.

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

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person know who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Referrals to local children's services are done in one of 2 ways

- Calling Children Services and discussing the case anonymously and discussing a forward plan of action. At this point it may be advised to contact local policing teams, and/or complete an Early Help Assessment.
- Completion of an Early Help assessment if the needs of the child are beyond that of universal services. This is done with the consent of parents/carers.

Escalation

When concerns regarding practice or decision making arise or a lack of movement on a case arise

the case can be escalated with the Local Authority. This is a 5 stage process.

1. The Academy would raise a concern with the case worker's/practitioner's line manager. This is usually done in writing. The line manager will then discuss a proposed solution with the practitioner within 1 to 2 working days. If unresolved this will be escalated to the next stage.
2. The line manager will discuss the case with a counterpart in another organization within 8 working days. If unresolved this will move to the next stage
3. Head of service will liaise with the line manager to agree a way forward within 11 working days. If unresolved this will move to stage 4.
4. Escalation to Assistant Director within 15 working days. If unresolved within the time frame
5. Escalation to North East Lincolnshire/Lincolnshire Children Services.

A resolution should be given within 22 days. Records of calls and emails should be kept at all points and recorded on CPOMS and retained in the child's safeguarding folder.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority Children's Services. Make a referral to Children's Services directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism or supporting terrorism, or the local authority Children's Services.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which academy staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Mental Health

Children at the Academy will be taught about mental health and wellbeing through PSHE lessons,

the wider curriculum, assemblies and other learning opportunities. Staff must have a professional curiosity when having these discussions/teaching lessons on how children respond both verbally and non-verbally. Staff will be trained to observe behaviours/signs which could indicate mental health issues. These may include:

- Physical signs of harm that are repeated or appear non-accidental
- Changes in eating/sleeping habits
- Increased isolation from friends or family, becoming socially withdrawn
- Changes in activity and mood
- Lowering of academic achievement
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing – eg long sleeves in warm weather
- Secretive behaviour
- Skipping PE or getting changed secretively
- Lateness to, or absence from school
- Repeated physical pain or nausea with no evident cause
- An increase in lateness or absenteeism.

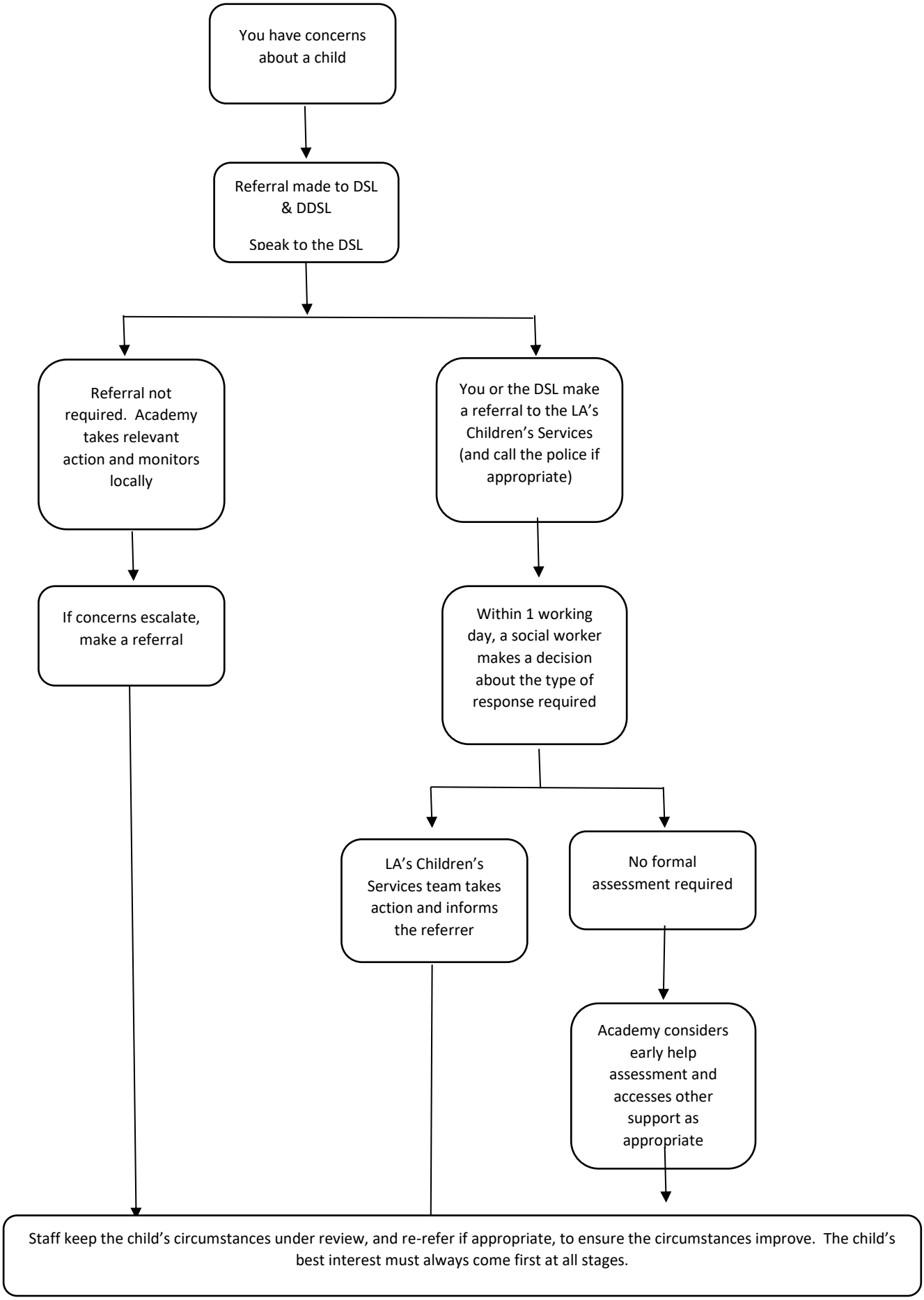
Should a member of staff have concerns regarding mental health issues these should be passed onto the DSL/Deputy DSL or another member of the SLT as soon as possible. Discussions with parents/carers and professionals would be had at this juncture and referrals made where appropriate. Referrals could include:

- YMM (Young Minds Matter)
- Fortis Therapy
- Educational Psychologist
- Access Pathway (where ADHD may be expected as an underlying issue)
- Internal mechanisms of support.

Staff at the Academy are aware that mental health needs can also be an indicator of wider issues such as abuse and other forms of harm and therefore all incidences should be reported.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note - if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the Principal. If the concerns/allegations are about the Principal, speak to the Chair of Governors.

The Principal/Chair of Governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Principal, report it directly to the local authority designated officer (LADO).

7.8 Allegations of abuse made against other students

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse (ie that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under the MAT's Behaviour Policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the Academy at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority Children's Services team and follow its advice, as well as the Police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any other affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact Young Minds Matter (YMM), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimizing the risk of child-on-child abuse

We recognize the importance of taking proactive action to minimize the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

We will minimize the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualized language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualized or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- Being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Supporting children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensuring students know they can talk to staff confidentially
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Ensure staff are trained to understand:
    - How to recognize the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it doesn't not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, eg by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our Academy from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**

- View, copy, print, share, store or save the images and videos yourself, or ask a student to share or download it. If you have already viewed the images and videos by accident, you must report this to the DSL
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate Academy staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the Police and/or Children's Services and recorded in line with the procedures set out in the Child Protection Policy
- If it is necessary to view the images and videos in order to safeguard the young person (in most cases, images and videos should not be viewed)
- What further information is required to decide on the best response
- Whether the images and videos have been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents should be involved).

The DSL will make an immediate referral to Police and/or Children's Services if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggest the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the imagery is under 13

- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the Police or Children's Services.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to Police and/or Children's Services, the DSL will conduct a further review.

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to Children's Services and/or the Police immediately.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the Police

If it is necessary to refer an incident to the Police, this will be done through dialing 101.

Recording incidents

All sexting incidents and the decision made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Students are taught about the issues surrounding sexting as part of our Careers and Personal Development lessons and as part of their Relationships and Sex Education programme. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- This information on sexting is also shared with students so they are aware of the processes the Academy will follow in the event of an incident.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognize the importance of ensuring pupils feel safe and comfortable to come forward and report and concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

Reporting system

Should a child want to confidentially report abuse, the first port of call in most cases would be an adult they feel comfortable with (a trusted adult). We understand that speaking out about the issue of abuse is a major step and requires the child to feel comfortable sharing that information with their trusted adult. Once reported, the member of staff would make notes on the concern/allegation and these would be shared with the DSL/Deputy DSL or a member of SLT if neither are available. If the allegation/concern is raised directly with the DSL/Deputy DSL, safeguarding procedure will be followed as per this policy. The member of staff would also remind the child that the information will have to be shared with appropriate agencies and people within the Academy, that they cannot 'keep a secret' and that the information will not be shared freely with those who do not require to know. The children are made aware through regular conversation, PSHE (which encompasses RSHE), the wider curriculum and assemblies who in the Academy is a point of support should they have any concerns regarding their wellbeing and safety.

Throughout this process, children should never be made to feel that they are causing a problem or being a nuisance. The child should be reminded that they have done the right thing by talking to an adult they trust and that the Academy will make sure that the situation is dealt with discreetly and in an organized manner. The process of what is happening will also be explained to children where appropriate and if necessary, a member of staff will advocate for the child when speaking to other professionals/agencies. Staff will not enter into discussions about their opinions, nor discuss what they believe should happen as a result of the concern being raised/allegation made.

Through teaching opportunities children will be taught that it is okay to be open and honest when harm is done to them or others and that there is no stigma around addressing such issues.

8 Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in may safeguarding and wellbeing issues.

To address this, our Academy aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educated pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks on online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the Academy's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out int the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the Academy's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our Academy community.
- In line with the DfE guidance, the following are added; disinformation, misinformation and conspiracy theories to the list of content risks under online safety. Disinformation is the deliberate creation and spread of false or misleading content, such as fake news. Misinformation is the unintentional spread of this false or misleading content (Cabinet Office, Department for Science, Innovation and Technology, 2023)
- In line with KCSIE 2025, a link to the DfE guidance Generative AI: product safety expectations. This guidance on generative artificial intelligence (AI) explains how filtering and monitoring requirements apply to the use of generative AI in education and supports schools to use generative AI safely. This formulates part of the Academy's safeguarding procedures and knowledge.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our Academy's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

Mobile phones and cameras

Staff are allowed to bring their personal phones to the Academy for their own use, but will limit

such use to non-contact time when students are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with students.

Staff will not take pictures or recordings of students on their personal phones or cameras.

We will follow the Data Protection Act 1998 when taking and storing photos and recordings for use in the Academy

"Any images or videos of students will only be taken and used for sound educational reasons. Parental consent for use of photographs can be found on BromCom. Photographs for Academy use should only be taken using Academy-provided equipment and stored in an appropriate location on the Academy network. Where students need to produce images they must use Academy cameras and be kept under close supervision. Images must not be uploaded to any external web-service or sent to anyone outside the Academy without prior authorisation from the Information & Communications Officer and Principal of the Academy.

Photographs of students or their work must not be taken on personal devices without the express consent of the Safeguarding Officer who reserves the right to refuse such requests for any reason. The ICS department has a large number of cameras capable of capturing both still and video, and acquiring these for loan is a straightforward process that can be completed at any helpdesk, or on sites without a permanent helpdesk, by prior arrangement with a member of the ICS team or from designated person(s) on site."

Filtering and monitoring

As part of our on-going responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the governing body and Principal will take all reasonable measures to limit children's exposure to the risk of school's IT system. As part of this process, the governing body and Principal will ensure the school has appropriate filtering and monitoring systems in place and regularly review their effectiveness periodically to safeguard our systems, staff and students. These reviews will also allow the school to keep up with evolving cyber-crime technologies. The Governing body and Principal will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how the escalate concerns when identified. The governing body and the Principal will consider the number of and age range of the children in the school, those who are potentially at great risk and harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The Academy will adopt appropriate filtering and monitoring systems for the school setting, informed in part, by the risk assessment required by the Prevent Duty.

The school will meet this duty by adhering to the Standards set buy the Department of Education. We will:
Identify and assign roles and responsibilities to mange filtering and monitoring systems
Review filtering and monitoring provision at least annually
Block harmful and inappropriate content without unreasonable impacting teaching and learning
Have effective monitoring strategies in place that meet their safeguarding needs.

The governing body and the Principal will review these standards and discuss with all appropriate staff including IT staff.

9 Notifying parents

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

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

If we believe that notifying the parents would increase the risk to the child, we will discuss this with

Children's Services before doing so.

In case of allegations of abuse made against other children, we will normally notify the parents of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them.

10 Students with special educational needs and disabilities

We recognise that students with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Students being more prone to peer group isolation than other students
- The potential for students with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

We offer extra pastoral support for students with SEN and disabilities.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11 Students with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support.

12 Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads.

We have an appointed designated teacher in each Academy who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

13 Complaints and Concerns About Academy Safeguarding Policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

The complaint must be raised within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. We will consider complaints made outside of this time frame if exceptional circumstances apply.

All correspondence, statements and records of complaints will be kept confidential except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Education Act requests access to them.

The first stage of the formal procedure will be as follows:

1. The complainant must put the complaint in writing, addressed to the Principal, setting out briefly the facts and stating what it is that the complainant considers should have been done or where the Academy has not met reasonable expectations.
2. An investigation will be carried out by a member of the Senior Leadership Team – including the Principal – who will speak to the relevant people involved including the complainant if required.
3. The investigator will put her/his findings in writing and will indicate what, if any, steps should be taken to resolve the matter. Whenever reasonably possible, this will be done within 15 school days of receipt of the letter of complaint. These records should include whether the complaint was resolved at this stage or whether they proceeded to a panel hearing. The panel will provide a copy of the findings to the person complained about. The Academy will also have copies available on their premises ready for inspection. A written record of all complaints made will be kept regardless of whether they are upheld.

This will include:

i. Whether they are resolved following a formal procedure, or proceed to a panel hearing; and
ii. Action taken by the Academy as a result of those complaints (regardless of whether they are upheld. Any complaint relating to the Principal of a Constituent Academy must be raised in the first instance with the CEO who will, if an informal resolution cannot be reached, investigate in the same way as in the first stage of the formal process outlined above.

Any complaint relating to the Chief Executive must be raised in the first instance with the Chair of

the Board of Trustees (or Vice Chair in the absence of the Chair) who will, if an informal resolution cannot be reached, designate a Trustee to investigate in the same way as in the first stage of the formal process outlined above. Further details can be found in the Academy's Complaints Policy.

13.3 Whistleblowing

The term 'whistleblowing' is most commonly used when an employee (or ex-employee) disclosed malpractice within an organisation in the public interest. Malpractice can include fraud, corruption, bribery, dishonesty, financial irregularities, serious maladministration arising from the deliberate commission of improper conduct, unethical activities (which may be of a criminal nature) and dangerous acts or omissions which create a risk to health, safety or the environment, criminal offences or failure to complete with a legal or regulatory obligation.

For further information see 'Whistleblowing Policy and Procedure'.

14 Record Keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decision made and the reasons for those decision, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the Academy.

If a child for whom the Academy has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

All paper records held are kept securely in locked cabinets which are only accessible to the DSL, deputy DSL and the Principal.

All information is recorded and held electronically on CPOMS. Senior Staff are required to complete two-factor authentication in order to log on and access information.

KCSIE (2025) states that: DPA and UK GDPR **do not** prevent the sharing of information for the

purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

In addition:

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

15 Training

15.1 All Staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, to ensure they understand the Academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the Government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being susceptible to an extremist ideology and to challenge extremist ideas.

All staff will undertake training in regarding the expectations and applicable roles and responsibilities in relation to filtering and monitoring

Staff will also receive regular safeguarding and child protection updates (for example, through emails and staff meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and Deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the Academy to deliver a robust whole-school approach to safeguarding.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for

this purpose.

15.4 Recruitment - interview panels

At least one person conducting any interview for a post at the Academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

15.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

16 Monitoring arrangements

This policy will be reviewed annually by Lincolnshire Gateway Academies Trust. At every review, it will be approved by the Board of Trustees.

17 Links with other policies

This policy links to the following policies and procedures:

- Behaviour Policy
- Professional Code for Employees
- Complaints Policy
- Health and Safety Policies
- Attendance Policy & Procedures
- E-Safety for Information & Communications Systems Policy
- Equal Opportunities Policy - Students
- Sex & Relationship Education Policy
- Whistleblowing Policy & Procedures
- Curriculum Policy
- Privacy Notices
- Data Protection Policy
- Physical Contact by Staff During Physical Education Policy

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

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

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sharing of nudes and semi-nudes ('sexting')

- Sharing of nudes and semi-nudes as the distribution of inappropriate images can result in children witnessing and hearing the ill-treatment of others.
- Sharing of nudes and semi-nudes can also result in serious bullying (including cyber-bullying) causing children to frequently feel frightened or in danger, or the exploitation or corruption of children.
- Sharing of nudes and semi-nudes and the distribution of inappropriate images is a form of sexual abuse. The perpetrators of this can be adult males and females as well as other children.

Neglect and Exploitation is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Harm can occur inside and outside of the academy, inside and outside of the home, and online.

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

Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
Protect a child from physical and emotional harm or danger
Ensure adequate supervision (including the use of inadequate care-givers)
Ensure access to appropriate medical care or treatment

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

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

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our Academy's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Oder 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

We will record all information on the checks carried out in the Academy's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' HR files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Application forms

Our application form will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity related to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given to them
- Explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true.

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.
When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees.
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidates most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidates worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Record all information considered and decisions made.

Pre-appointment vetting checks

We will record all information on the checks carried out in the Academy's single central record (SCR). Copies of these check, where appropriate, will be held in individual's personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of this for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Check those candidates taking up a management position are not subject to a prohibition

from management (section 128) direction made by the secretary of state
- For all staff, including teaching positions: criminal records check for overseas applications
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check those candidates taking up a management position* are not subject to a prohibition form management (section 128) direction made by the secretary of state.

*Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel files. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if tis happens only once and regardless of whether they are supervised or not.

Existing staff

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

- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, or there is reason to believe the individual has committed a listed relevant) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work in the academies has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the Academy.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and controls measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure the appropriate checks are carried out to ensure that induvial are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risk and control measures put in place, and any advice sought.

Governors and members

All trustees, local governors and members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.
All governors will also have a section 128 check (as a sections 128 direction disqualifies and individual from being a maintained school governor)
The chair of the board will have their DBS checked and countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities].
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK
- All governors will also have the following checks:
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

- Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform as well as written information about any arrangement that may put the child at risk.ltern

Adults who supervise pupils on work experience

- When organizing work experience, we will ensure that policies and procedures are in place to protect children from harm.
- We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Students staying with host families

Where the Academy makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the Academy is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner academies abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff

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

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).

It applies regardless of whether the alleged abuse took place in the Academy. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the Police.

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

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

Suspension of the accused until the case is resolved

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the Academy so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the Academy so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative Academy or other work for the Multi Academy Trust.

If in doubt, the case manager will seek views from the Academy's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Where a child is placed in alternative provision, Cleethorpes Academy will continue to be responsible for the safeguarding of the child and will ensure that we are satisfied that the placement meets the needs of the child. In line with this expectation the academy will have records of the addresses of the AP provider and any subcontracted provision or satellite the child may attend. The academy will also regularly review AP placements to ensure the placement is safe and meets the child's needs.

Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the principal (or chair of governors where the principal is the subject of the allegation) will work with the designated safeguarding lead for the Academy and the designated safeguarding lead for the Trust – the 'case manager' – will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Immediately discuss the allegation with the Local Authority Designated Officer (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the Police and/or Children's Services. (The case manager may, on occasion, consider it necessary to involve the Police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the Police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the Police or Children's Services, where necessary). Where the Police and/or Children's Services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the Academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, Police and/or Children's Services, as appropriate.

- If immediate suspension is considered necessary, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Academy and their contact details.

- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

- If it is decided that further action is needed, take steps as agreed with the LADO to initiate the appropriate action in the Academy and/or liaise with the Police and/or Children's Services as appropriate.

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with Children's Services and/or

the Police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including whether the disciplinary process is being used (in confidence).

- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

Additional considerations for supply staff

If there are concerns or an allegation is made against someone not directly employed by the Academy, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing body will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the Academy, while the Academy carries out the investigations
- We will involve the agency fully, but the Academy will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the Police and/or Children's Services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the Academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the Academy's HR adviser will discuss with the LADO whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and HR adviser will discuss with the LADO whether to refer the matter to the NCTL to consider prohibiting the

individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the Academy.

Unsubstantiated or malicious allegations

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

Confidentiality and information sharing

The Academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, Police and Children's Services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential HR file for the duration of the case. Such records will include:

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

If an allegation or concern is not found to have been malicious, the Academy will retain the records of the case on the individual's confidential HR file, and provide a copy to the individual. Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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

References

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

Learning lessons

After any cases where the allegations are substantiated, we will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the Academy's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
Where an adult makes and allegation to the Academy that they were abused as a child, we will advise the individual to report the allegation to the police.

Section2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

- Concerns may arise through, for example:
- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside of the Academy
- Pre-employment vetting checks

We recognize the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-lever concerns

The term 'low level' concern is any concern – no matter how small-that an adult working in or on behalf of the Academy may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Doesn't not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favorites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognize the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create a culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as peer section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the Academy's safeguarding system.

Responding to low-level concerns

Id the concerns is raised via a third party, the principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concerns, unless it has been raised anonymously
- To the individual involved and any witnesses

The Principal will use the information collected to categories the type of behaviour and determine any further action, in line with the Academy's Staff Disciplinary Policy and Code of Conduct. The Principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concern policy: A guide for organisations which work with children

Record Keeping
All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerns, problematic and inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedure or, where a pattern of behaviour moves from concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves' employment at the Academy.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behavior can be identified.

References

We will not include low-level concerns in reference unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns0 relates to issues which would ordinarily be included in

reference, such as misconduct or poor performance.

Appendix 4: specific safeguarding issues

Children missing from education

A child going missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding issues. This might include abuse and neglect, such as sexual abuse or child criminal exploitation or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. In the case of absent pupils, early identification could help to prevent the risk of them becoming a child missing education in the future.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or other Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to Children's Services and the Police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Elective Home Education (EHE)

Many home educated children have positive learning experiences. Cleethorpes Academy would expect parents' decision to home educate to be made with their child's best interest at the heart of their decision. However, this is not the case for all. Elective Home Education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and support in line with their needs.

When Cleethorpes Academy become aware that parents/carers intend to educate their child at home a meeting will be suggested to parents/carers with themselves and all key professionals present prior to a final decision being made, to consider what is in the best interest of the child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/is otherwise vulnerable.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into 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.

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (County Lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to Children's Services and the Police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of abuse 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 or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CSE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to Children's Services and the Police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur

simultaneously between the two.
Our Academy has a zero-tolerance approach to sexual violence and sexual harassment. We recognize that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our Academy's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognize that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Older children may also experience domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and

psychological impact on children and affect their health, wellbeing, development and ability to learn.

If Police are called to an incident of domestic abuse and any children in the household have experienced the incident, the Police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at the Academy the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to Children's Services.

So-called 'honour-based' abuse (including FGM and forced marriage)

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs - for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations

- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a student may be a risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parent stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation - for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

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

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, ie we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the LADO
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that

- Endangers or causes serious violence to a person/people
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our academy being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The Government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Further information regarding indicators of being susceptible to radicalization can be found on the DFE website.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour - staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the Academy's measures to prevent radicalisation are set out in other Trust policies and procedures, including E-Safety for Information & Communications Systems Policy.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

Between 2 children of any age and sex
Through a group of children sexually assaulting or sexual harassing a single child or group of children
Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, an all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

Reassure victims that the law on child-on-child abuse is there to protect them, to criminalise them
Regular review decisions and actions, and undated policies with lessons learnt
Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
Consider if there are wider cultural issues within the Academy that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimize the risk of it happening again
Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and gender questioning (LGBT) children are at greater risk.

Staff should be aware of the importance of:

Challenging inappropriate behaviours
Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitals, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risk normalizing them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our Academy's approach to this type of abuse.

Children who are lesbian, gay, bisexual or gender questioning

A child being lesbian, gay, bisexual is not itself and inherent risk factor of harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual (whether they are or not) can be just as vulnerable as children who are.

Caution is necessary for children questioning their gender as there are still unknowns around the impact of social transition, and that children may have wider vulnerabilities, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or

attention deficit hyperactivity disorder (ADHD)

When families/carers are making decisions about support for gender questioning children, they should encourage to seek clinical help and advice.

As such, when supporting a gender questioning child, Cleethorpes Academy will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk or harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Cleethorpes Academy will refer to the DFE Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

All staff must be aware that risk can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavor to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

Increased absence from school
Change in friendship or relationships with older individuals or groups
Significant decline in performance
Signs of self-harm or a significant change in wellbeing
Signs of assault or unexplained injuries
Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation
Risk factors which increase the likelihood of involvement in serios violence include:
Being male
Having been frequently absent or permanently excluded from school
Having experienced child maltreatment
Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in or at risk of, serious violence, they will report to the DSL.

Checking the identity and suitability of visitors

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

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in at Reception and wear a visitor's badge.

Visitors to the Academy who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the Local Authority or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times.

We will not invite into the Academy any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using Academy facilities is not seeking to disseminate extremist views or radicalise students or staff.

Checks

The need for a DBS check will be determined as follows:

It is not envisaged that DBS checks will be required where there will be no contact between subcontractors and students; for example, where a building is to be built on an area segregated by a perimeter fence, or where the works will be undertaken outside Academy hours or during Academy holidays. In this case, only supervisory staff will be DBS checked.

However, where a subcontractor is likely to have either frequent or prolonged contact with students then it will be appropriate to obtain a DBS check in addition to measures to supervise contact. For example, a check will be appropriate where a subcontractors' representative (e.g. foreman, site manager, etc) needs to liaise with Academy staff in a day-to-day basis.

Unexplained and/or persistent absences from education

All staff must be aware that unexplained or persistent absences from education may be an indicator that a child is at risk of harm, or are at risk from, or are involved with, serious violent crime.

Missing students

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

Text message and/or telephone call to find out the reasons for the absence and reassurance from a parent/carer that the child is safe at home
In the event of no response, a member of Academy staff will call back regularly and risk asses.
When the parent/carer does answer the call/text message and conc=firms the child is safe with them, ask for the reason for the absence and record it on the Academy's attendance management system (SIMs)
If we can't get confirmation form a parent/carer the Academy's DSL will be consulted. The degree of risk will be assessed on the level of vulnerability of the child. A welfare check may be carried out by the Education Welfare Officer and/or member of the pastoral team
If the parent/carer does respond to the call/text message and the child is not with them and the parent is concerned, then the Academy will advise the parent/carer to contact the local police to inform them that their child is missing
If necessary, the Academy may contact the Police and/or Children Services
Ensure that the parents/carers report back to school if the child is found or remains missing.

Non-collection of children
Procedure at the end of the day

If a child has not been collected and has not way of getting hoe, they are to be taken to the pupil office to try and make contact with home. If contact is not made then a member of the senior leadership team must be contacted
If a member of the senior leadership team is unable to establish contact over a period of time, they will make a decision as to weather to visit the family home to establish contact; phone social services; phone the police. This decision will be made in conjunction with any relevant information, relating to the individual child

Out-of-school Settings:

Any activities provided by the Academy, which are under its direct supervision and management will be in line with its child protection arrangements. However, where services or activities are

provided separately by another body this is not be necessarily the case. The governing body or Principal with therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the academy on these matters where appropriate. This applies regardless of whether or not the child who attend any of these services or activities are children on the school roll or attending college. The governing body or Principal will also ensure safeguarding requirements are included in any transfer of control agreement (i.e., leasing or hire agreement), as a condition of use and occupation of the Academy and its premises; and the failure to comply with this would lead to termination of the agreement.

After School Clubs:

At the end of the club, teachers must follow exactly the same procedures as if it was the end of the school day. If a parent does not collect, it is the responsibility of the teacher to contact home. If nobody collects and parents cannot be contacted, a senior member of staff must be informed.

Educational Visits:

Where a visit/sporting fixture means pupils may not be collected until a later time, the same procedures must be followed.

Pupils must always be collected at the normal exit e.g. if exiting a coach, parents must not just take their children there and then as it is too difficult to ensure pupils have been collected by the designated adult.

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

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

What will the local authority do?

Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- The child requires immediate protection and urgent action is required
- The child is in need, and should be assessed under section 17 of the Children Act 1989
- There is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries much be made and the child assessed under section 47 of the Children Act 1989
- Any services are required by the child and family and what type of services
- Further specialist assessments are required to help the local authority to decide what further action to take
- To see the child as soon as possible if the decision is taken that the referral requires further

assessment.

The referrer should follow up if this information is not forthcoming.

If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required.

If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

The Prevent duty

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

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. DSLs and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Additional support

The department has published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel guidance, and a Channel awareness e-learning programme is available for staff at: Channel General Awareness.

The Academy's DSL (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the Academy may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

The use of 'reasonable force' in schools and colleges

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' coves the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom.

Departmental advice for schools is available at **Use of Reasonable Force in Schools.**

The department believes that the adoption of a ‘no contact’ policy at school or college can leave staff unable to fully support and protect their pupils and students. It encourages headteachers, principals, governing bodies and properties to adopt sensible policies, which allow and support their staff to make appropriate physical contact. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, schools and colleges should, in considering the risks carefully, recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans or more vulnerable children, and agreeing them with parents and carers, schools and colleges can reduce the occurrence of challenging behaviour and the need to use reasonable force.

Children and the court system

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

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

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

Children with family members in custody and/or prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Similarly, where contractors’ staff and subcontractors regularly visit the schools to undertake routine maintenance (boilers, electrical tests, etc.) then a DBS check will be undertaken in addition to measures of supervise any contact.

All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the Academy any speakers who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organization using Academy facilities is not seeking to disseminate extremist views or radicalize students or staff.

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the Academy. All staff, but especially the DSL (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare. Children’s social care assessments

should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Staff Conduct and Safeguarding Matters

All staff working with children should adopt high standards of personal conduct at all times in order to maintain the confidence and respect of their peers, students and the public in general. This is particularly important if you are socialising in a public place. You must always be aware that you are easily recognised even if you do not recognise other members of the public. You need to be aware of your own actions, what you are discussing and the language you are using. It is of paramount importance that you remain professional both in and out of the workplace. Do not have students as friends on any social media sites. This is to safeguard yourself and the students. If you become aware of the activities of a colleague that breach these instructions, you must report it to the Principal of your Academy immediately. These standards apply to all adults who work at the Academy, all staff are in a position of trust.

Addendum

Sometimes children come to a teacher to discuss problems or worries which will not necessarily have any 'Child Protection' significance but nevertheless the child is clearly worried or distressed. If you feel there are underlying problems which ought to be addressed, you should persuade the student to speak to a senior member of the Pastoral team. In any case, you should inform the most appropriate person of your concerns. It would not necessarily mean breaking confidentiality. You should not become involved in regular discussions or 'counselling' with a student before consulting a senior member of management.

Child Protection Officer	Miss V Watts
Deputy Child Protection Officers	Mrs S White & Mrs M Brett

Nominated Governor for Child Protection – Mrs J Aukett

Lincolnshire Gateway
Academies Trust

Please sign and return this page to the HR department

Child Protection and Safeguarding Policy and Procedures

I confirm that I have read and understood the Child Protection and Safeguarding Policy and Procedures document. I have retained the original copy issued to me.

Name

Signature _____ Date