



## **Safeguarding Policy**

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## Version History

|                            |          |
|----------------------------|----------|
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| Date       | Author  | Version | Comment                                                                                                                                 |
|------------|---------|---------|-----------------------------------------------------------------------------------------------------------------------------------------|
| July 2020  | JH      | 1       |                                                                                                                                         |
| July 2021  | JH      | 2       | KCSIE changes included                                                                                                                  |
| May 2022   | RC      | 3       | Low level concerns, Appendix 3.1 added                                                                                                  |
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| July 2023  | RC      | 5       | KCSIE 2023 changes included                                                                                                             |
| October 23 | RC      | 5       | Andrew Skeffington confirmed as Safeguarding Trustee                                                                                    |
| May 24     | RC      | 5       | Updated Working Together to Safeguard Children 2023 and working together to improve school attendance from 19 <sup>th</sup> August 2024 |
| Sept 24    | RC      | 6       | Added 2024 updates KCSIE                                                                                                                |
| July 25    | RC      | 6       | Added 2025 Updates KCSIE                                                                                                                |
|            |         |         |                                                                                                                                         |
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|            |         |         |                                                                                                                                         |
|            |         |         |                                                                                                                                         |

## Important contacts

| ORGANISATION                           | ROLE                                               | NAME               | CONTACT DETAILS |
|----------------------------------------|----------------------------------------------------|--------------------|-----------------|
| The Enquire Learning Trust             | Vulnerable Pupils Officer                          | Jaimie Holbrook    | 01924 792 960   |
| The Enquire Learning Trust             | Vulnerable Pupils Leader                           | Rachel Cooper      | 01924 792 960   |
| The Enquire Learning Trust             | Chair of Trustees                                  | Delyse Turrell     | 01924 792 960   |
| The Enquire Learning Trust             | Safeguarding Trustee                               | Andrew Skeffington | 01924 792 960   |
| The Enquire Learning Trust             | Chief Executive Officer<br>Whistle Blowing Officer | Darren Holmes      | 01924 792 960   |
| The Enquire Learning Trust             | Director of People<br>Whistle Blowing Officer      | Lauren Pilgrim     | 01924 792 960   |
|                                        |                                                    |                    |                 |
|                                        | LADO                                               |                    |                 |
| Local Authority<br>Children's Services | Children's Services                                |                    |                 |
| Early Help Service                     | Local Authority Early<br>Help Service              |                    |                 |

| Organisation            | Contact Details |
|-------------------------|-----------------|
| Channel Helpline        | 020 7340 7264   |
| Extremism Helpline      | 020 7340 7264   |
| Anti-Terrorist Helpline | 0800 789 321    |
| NSPCC Helpline          | 0808 800 5000   |
| Operation Encompass     | 0204 513 9990   |
| Forced Marriage Unit    | 020 7008 0151   |

If a child is at risk of immediate harm you must call the Police on  
999

## Useful Information

Add local information here in relation to safeguarding services and family help such as refuge, foodbanks etc

Support for professionals can be found in the county lines toolkit here [County Lines Toolkit For Professionals | The Children's Society \(childrensociety.org.uk\)](#)

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

### Preventing Child Sexual Exploitation | The Children's Society

Government guidance on Forced Marriage can be found here [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](#)

### Lucy Faithfull Foundation - What is harmful sexual behaviour - Lucy Faithfull Foundation

Non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice [Multi-agency Practice Principles for responding to child exploitation and extra-familial harm \(researchinpractice.org.uk\)](#)

Children and the court system - <https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>

## 1. Aims

The academy aims to ensure that:

Appropriate action is taken in a timely manner to safeguard and promote children's welfare

All staff are aware of and understand their statutory responsibilities with respect to safeguarding

Staff are properly trained in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping children safe in education 2025](#) and [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#) and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

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

Statutory guidance on Working Together to Improve School Attendance [Working together to improve school attendance \(applies from 19 August 2024\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/Working_together_to_improve_school_attendance.pdf)

#### Alternative provision - GOV.UK

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

[Prevent duty guidance: Guidance for specified authorities in England and Wales \(print-ready PDF\) \(publishing.service.gov.uk\)](#) which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) 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 meets requirements relating to safeguarding and welfare in the

#### EYFS statutory framework for group and school-based providers

[Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#) which has guidance on filtering and monitoring of online activity to keep children safe.

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

### 3. Definitions

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

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

**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.

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

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

The following three **safeguarding partners** are identified in Keeping Children Safe in Education 2025 (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

#### 4. Equality statement

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

We have due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act 2010), to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not. Guidance from the Human Rights Act (1998), the Equality Act (2010) and Public Sector Equality Duty is followed.

We give special consideration to children who:

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

Are young carers

May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

Children who are LGBTQ+ (see section 7)

Have English as an additional language

Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

Are asylum seekers

Are at risk due to either their own or a family member's mental health needs

Are looked after or previously looked after (see section 11)

Further guidance can be found here [Equality Act Advice Final.pdf](#)  
([publishing.service.gov.uk](#))

## 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and AIC members in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

### 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 2025](#) 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 code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, how records should be kept on CPOMs 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 social care and for statutory assessments that may follow a referral, including the role they might be expected to play

What to do if they identify a safeguarding issue or a child tells them they are being abused 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), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

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 senior leadership team. Our DSL The DSL takes lead responsibility for child protection and wider safeguarding.**

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

**When the DSL is not available the Deputy Designated Safeguarding Lead (DDSL) will act as cover. Our DSL is**

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

The DSL will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

Provide advice and support to other staff on child welfare and child protection matters

The DSL is responsible for maintaining accurate and up to date records of all safeguarding concerns.

The DSL should liaise with the Principal to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

The DSL should ensure each member of staff has access to, and understands, the academy's child protection policy and procedures, especially new and part time staff.

The Designated Safeguarding Lead (DSL) is responsible for ensuring that all safeguarding issues raised are effectively responded to, recorded and referred to the appropriate agency.

For example, the DSL is responsible for referring cases to Children's Social Care if there are signs of abuse, to Channel if there are radicalisation concerns, and to the police if a crime has been committed.

The DSL should understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements. They should also have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

They are responsible for arranging whole school safeguarding training for all staff and volunteers who work with children and young people in the school/establishment and that this training takes place at least every two years. They should act as a source of support, advice and expertise for other staff.

The DSL ensures that safeguarding procedures are in line with those of the Local Safeguarding Partnerships' protocols, including mandatory attendance at any Local Safeguarding Partnerships' training programs and receiving monitoring visits from the professional advisor or local authority delegated staff.

The DSL ensures that a senior member of staff who has the relevant training and access to appropriate supervision, attends: all conferences, core groups or meetings where it concerns a child at one of our academies and to contribute to multi-agency discussions to safeguard and promote the child's welfare.

The DSL ensures that the Local Safeguarding Partnership Audit is completed and submitted annually. When the audit highlights any areas for improvement, this will be detailed in the action plan which will be signed off and monitored by the named governor for safeguarding to ensure these improvements are implemented. The audit is to be shared annually with the local authority and the Trust, which will have an auditing role in ensuring that the academy is meeting its safeguarding requirements under sec 175/157 of the Education Act 2002 for both maintained and independent schools.

The DSL should be aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019. [PACE Code C 2019 \(accessible\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/404269/pace-code-c-2019.pdf)

The DSL and DDSLs should have access to appropriate supervision separate from any appraisal process.

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

### 5.3 Governance

The **Board of Trustees** are collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.

Trustees will receive appropriate safeguarding and child protection (including online safety and expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction, and this will be updated on a regular basis.

Flick training will maintain a record of Trustee professional development.

Trustees are responsible for the oversight of safeguarding arrangements and fulfill this role at strategic level. The process involved includes termly safeguarding visits to academies, a termly report to trustees and attendance of the vulnerable pupils officer and vulnerable pupils lead at the termly standards committee. There is a named trustee who champions safeguarding within the Trust.

The Trustees also delegate responsibility to AICs who are accountable for challenging the implementation of this policy and compliance with it. Although the AIC takes collective responsibility to safeguard and promote the welfare of pupils.

The AIC will consider how pupils are taught to keep themselves safe, via the curriculum and other methods and how student voice provides feedback for the pupils' opinions.

The AIC have access to termly Designated Safeguarding Lead sessions that are hosted by the vulnerable pupils lead and attend termly academy meetings as part of their role.

The Trust's named Trustee for safeguarding is Andrew Skeffington. To contact Andrew, please visit the 'Contact Us' part of the Enquire Learning Trust website which can be found here [Contact us | The Enquire Learning Trust](#).

All AIC members will read and demonstrate an understanding of Keeping Children Safe in Education 2025.

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

### 5.4 The Principal

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

The Principal will ensure that all staff in their academy read and have understood at least part one (and Annex A if they work directly with children) of DfE statutory guidance, Keeping Children Safe in Education 2025, 'Safeguarding information for all staff'.

The Principal will respond appropriately to pupils who go missing from education and inform and report to the Local Authority safeguarding partnership when required. They will ensure, where possible, that the school holds more than one emergency contact number for pupils.

It is the responsibility of the Principal to ensure that all staff and volunteers are properly vetted (and/or supervised) to make sure they are safe to work with the pupils who attend our academies and that we have procedures for handling allegations of abuse made against members of staff (including the principal and volunteer helpers).

Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction

Communicating this policy to parents when their child joins the school and via the school website

Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly

Ensure that the Trust safeguarding CPD schedule is completed and updated on a termly basis to evidence Flick learning has been completed within the scheduled time frame by all staff

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)

Ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the Trust whistle blowing policy.

Liaising with the Designated Officer/LADO where an allegation is made against a member of staff and ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

Ensuring that staff, time and resources are allocated for the pupils to be taught about safeguarding themselves. So that pupils will recognise when they are at risk and how to get help when they need it, including online.

Ensuring the relevant staffing ratios are met, where applicable

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

## 6. Confidentiality

Staff should ensure they have followed the Information Governance Policy and note that:

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

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)

## 7. Recognising abuse and taking action

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

Staff should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected. They may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened, this could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

It is also important that staff build trusted relationships with children and young people which facilitate communication.

All staff should be aware that children who are LGBTQ+ may face additional barriers and require a safe space and have a trusted adult who they can speak to.

There is a safe and confidential reporting mechanism in place within the academy for children to share their worries and for their voice to be heard as an option for those children that prefer to do so this way. The procedure for this at ..... Primary School involves embedded listening systems which are age/stage appropriate and include Circle Time.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Inform the DSL (see section 5.2) as soon as possible if you make a referral directly.

Welfare concerns must be logged on CPOMS by the relevant person and the Designated Safeguarding Lead notified before the end of the school day. This includes concerns raised by others, including support staff, parents and volunteers in school. This may instigate 'early help' systems. CPOMS is checked by the Designated Safeguarding Lead each day.

- **General Welfare Concern** – child inappropriately dressed- e.g. clothes too small, inappropriate footwear, unkempt, dirty, smelly, poor dental hygiene, on-going changes in behaviour, observed behaviours of parent/carer with child, visible injuries to the child that are explainable – e.g. 'My sister scratched me when I was playing.'
- **Urgent Welfare Concern** - child coming to school hungry, no packed lunch or money to buy a lunch, ill, stealing food, looking malnourished, sudden change in normal behaviours (withdrawn, weepy, sulky etc.), inadequately dressed- e.g. no coat in winter, wet shoes, persistent lack of glasses over a week.  
Immediate log in CPOMS, immediate intervention which may be linked to parental contact, speaking to the child or referral to outside agencies as appropriate.

### Procedures for dealing with a Disclosure

Any suspected Child Protection issues must be dealt with as a matter of priority. There should be no delay in recording and reporting any instances.

These include:

- Visible marks on the child that are not satisfactorily explained.
- Child discloses that they have been abused.
- Reporting of abuse from other agencies including parents.

All staff must:

Recognise that a disclosure may come directly from the child, or from a third party, e.g. friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of symptoms and knowledge of possible indicators of abuse

Take seriously any disclosures made to them and provide reassurance to the discloser through their responses and behaviour.

Ensure that all verbal conversations are promptly recorded in writing.

Enter details onto CPOMS immediately and inform the Designated Safeguarding Lead, or if they are not available, the Deputy DSLs or other designated person immediately.

Staff must not investigate the matter themselves.

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 onto the DSL. Alternatively, if appropriate, make a referral to Children's Social Care and/or the Police directly (see 7.1), and tell the DSL as soon as possible.

### Recording information

- The disclosure must be recorded in full on CPOMS as recounted by the child.
- Information should be focused exclusively on the specific context and should not include extraneous information.
- If it is observation of bruising or an injury try to record detail, e.g. 'right arm above elbow' – indicate on the body diagram on CPOMS. Pass this information to the designated lead immediately
- note the non-verbal behaviour and the key words in the language used by the pupil (try not to translate into 'proper terms'). Use reported speech.
- Full names (not initials) are to be used in entry to CPOMS.
- CPOMS will alert the DSL and DDSL immediately.

- An action must be recorded on CPOMS and linked to the original entry with the steps that followed and the actions completed.
- Any handwritten notes, diagrams or paper based information from must be scanned into CPOMS, signed and dated. This must be clear and of good quality.
- The DSL and DDSL must monitor CPOMS entries to identify any area of development/training needed to ensure record keeping is of the highest standard.
- The Principal must sample a selection of CPOMS entries on a termly basis to ensure quality of recording. An entry must be made on CPOMS to indicate who/ when these records were sampled e.g. Sampled, date, outcome.
- The Vulnerable Pupils Leader, Rachel Cooper, must sample a selection of CPOMS entries on a termly basis as part of the quality assurance process.

### **Making a Child Protection Referral**

Once alerted, the Designated Safeguarding Lead will immediately review and assess the content of the report and, using their professional judgement, will decide as to whether the following actions are to be taken to establish the full facts:

- Engage in further discussion with the person who completed the report and add information if appropriate.
- Discuss with other parties i.e. the pupil, parents, other staff members.

Following the initial review, the Designated Safeguarding Lead will agree the next steps, which may be:

- No further action, but monitor the situation.
- Agree individual pupil support/monitoring.
- Seek advice from Children's Social Care.
- Referral to Children's Social Care.

If a referral is necessary, an immediate telephone call will be made to Children's Social Care. A full written log of the telephone referral will be made stating the date, time, name of contact and outcomes of the conversation using CPOMS, any further communication including meetings and phone calls will be recorded so that there is a clear trail of reporting and action.

If not satisfied with the response or outcome of the referral, the Designated Safeguarding Lead will continue to pursue the action by speaking to Team Leaders, Duty Managers and by contacting the Local Authority Designated Officer. The Trust's Vulnerable Pupils Leader, Rachel Cooper, must be informed of any referrals.

If a member of school staff refers a concern to the DSL but is not satisfied with how it has been dealt with, they should make a referral directly to children's social care and the Trust's Vulnerable Pupils Officer Jamie Holbrook or the Trust's Vulnerable Pupils Leader, Rachel Cooper.

### **Supporting pupils**

We recognise and understand our duty to promote the welfare of all children.

The staff and governors recognise that a child or young person who is abused or is a witness to violence may find it difficult to develop and maintain a sense of self-worth. We recognise that in these circumstances pupils might feel helpless and humiliated, and that they might feel self-blame

We recognise that this academy might provide the only stability in the lives of pupils who have been abused or who are at risk of harm

We accept that research shows that the behaviour of a pupil in these circumstances might range from that which is perceived to be normal to aggressive or withdrawn.

The school will support all pupils by:

- discussing child protection cases with due regard to safeguarding the pupil and his or her family.
- supporting individuals who are or thought to be in need or at risk in line with LSCB procedures.
- encouraging self-esteem and self-assertiveness.
- challenging and not condoning aggression, bullying or discriminatory behaviour.
- promoting a caring, safe and positive environment.

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

## 7.2 Working with parents/carers

Parents and carers play an important role in protecting their children from harm. In most cases, the school will discuss concerns about a pupil with the family and, where appropriate, seek their agreement to making referrals to Children's Social Care. **If you make a decision not to discuss your concerns with the child's parents or carers** this must be recorded in the child's child protection file with a full explanation for your decision.

- Where there are any doubts, the designated lead should clarify with Children's Social Care whether, and if so when and by whom, the parents should be told about the referral.
- The pupil's views will be considered in deciding whether to inform the family, particularly where the pupil is sufficiently mature to make informed judgements about the issues, and about consenting to that.

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

**The Department for Education's Keeping Children Safe in Education 2025 explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".**

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

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18 must immediately report this to the police**. 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 by the police, they should also discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil 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 pupils.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

#### **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 15 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.

The Trust's Vulnerable Pupils Leader, Rachel Cooper can be contacted for advice on all safeguarding matters.

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 Rachel Cooper (Vulnerable Pupils Leader), and/or from local authority children's social care. 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 social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Contact the police on 999 if the child is at risk of immediate harm.

#### **Early Help**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

#### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

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

### 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 social care. Make a referral to local authority children's social care 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 the local authority children's social care team.

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

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

Think someone is in immediate danger

Think someone may be planning to travel to join an extremist group

See or hear something that may be terrorist-related

### 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.

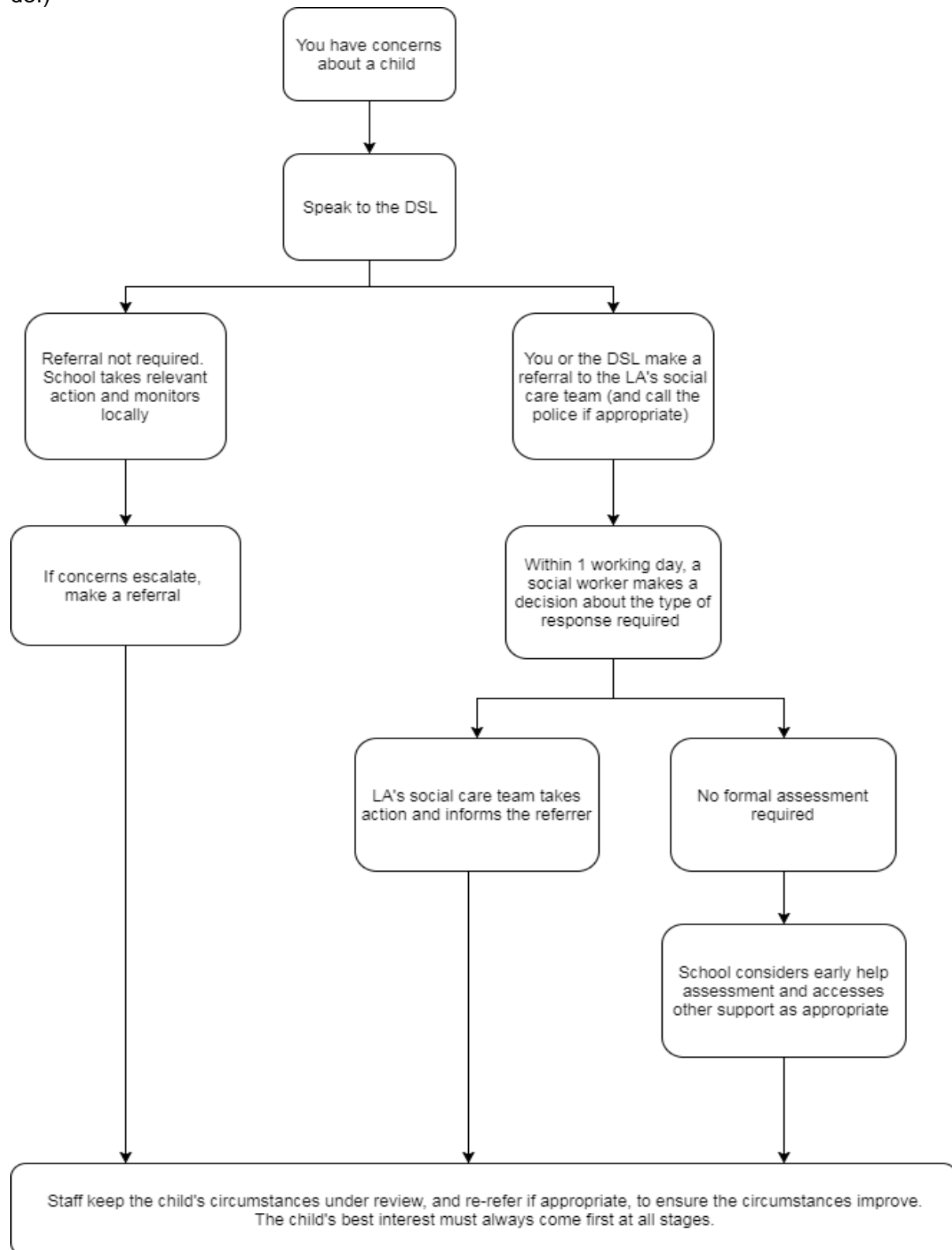
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

Consideration should be taken as to whether the pupil should be placed on the SEN register and advice from the SEMH Collaboration should be sought with parental consent.

**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 or volunteer

In order to provide employees with a recognised and consistent contact point, two Whistleblowing Officers have been designated. These are:

Chief Executive and Accounting Officer – Mr. Darren Holmes.

Director of Human Resources – Mrs. Lauren Pilgrim.

These officers will be the initial points of contact for employees who wish to use the Whistleblowing procedures. The Whistleblowing Officers will seek to assist an employee to raise a concern effectively.

Subsequent changes in officers will be communicated accordingly.

For specific guidance on how to respond to allegations against staff, please refer to the **Whistle Blowing Policy** which can be found on the school server in the staff shared drive.

## 7.8 Allegations of abuse made against other pupils

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”.

We also recognise the gendered nature of child on child abuse. However, all child on child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’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 pupils in the school at risk

Is violent

Involves pupils being forced to use drugs or alcohol

Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting, down blousing or sexually inappropriate pictures or videos (including sexting)

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

You must record the allegation and tell the DSL, but do not investigate it

The DSL will contact the local authority children’s social care 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 others affected) with a named person they can talk to if needed

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images

Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

Ensuring pupils know they can talk to staff confidentially by reporting to staff or using the talk boxes

Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## **7.9 Sexting- the use of nude or semi-nude images**

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

#### **You must not:**

**View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL**

Delete the imagery or ask the pupil to delete it

Ask the pupil(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 pupil(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 pupil(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 school staff. This meeting will consider the initial evidence and aim to determine:

Whether there is an immediate risk to pupil(s)

If a referral needs to be made to the police and/or children’s social care

If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)

What further information is required to decide on the best response

Whether the imagery has 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 pupils 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 pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care 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 suggests 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 pupil in the imagery is under 13

The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (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 headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **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 social care, the DSL will conduct a further review.

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

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care 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 pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contacting the LADO and the Police team.

### **Recording incidents**

All sexting incidents and the decisions 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**

Pupils are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. 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

Pupils 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 policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## Protected Characteristics

Pupils are taught about the protected characteristics as part of our PSHE education. Teaching covers the following:

What the 9 protected characteristics are and how these should be considered

Discrimination

Protection

Legality

## 'Up skirting' and 'Down Blousing'

Changes to the Voyeurism (Offences) Act 2019 now criminalise the act of 'up skirting'. The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders."

Staff should follow the same advice outlined for incidents of youth produced sexual imagery. Please note that when substantiated, this is a criminal act and the police should be informed.

## 8. Notifying parents

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

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

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

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

## 9. Pupils with special educational needs and disabilities

We recognise that pupils with special educational needs (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

Pupils being more prone to peer group isolation than other pupils

The potential for pupils with SEN and disabilities being disproportionately 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 pupils with SEN and disabilities.

The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service [Council for Disabled Children](#)

## 10. Pupils with a social worker

Pupils 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 pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil'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

## 11. 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 appointed a designated teacher, ....., 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 for looked-after and previously looked-after children \(publishing.service.gov.uk\)](#).

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. Non statutory support from the virtual school should be explored for children with a social worker or those children in kinship care arrangements.

## 12. Mobile phones, smart watches, and cameras

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 members' personal phones will remain in their bags or cupboards during contact time with pupils.

Smart watches have various apps and functions that may link to a mobile phone, this may include the ability to take and store photographs and/or make and receive telephone calls. Staff must not wear a smart watch with the function to take photographs for the protection of children and themselves. Staff must turn off phone notifications, including emails, calls, social media and any form of messaging service, during contact time with pupils.

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

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Staff must ensure they follow the Information Governance Policy and the Acceptable Use Policy.

## 13. Complaints and concerns about school 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

Other safeguarding related complaints should be made to the DSL / Deputy DSL and will be handled in accordance with our procedures and a referral and/or contact to the police.

Early years providers should take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.74).

### 13.3 Whistle-blowing

If any member of staff should have a concern about the conduct of another staff member or employee of the Enquire Learning Trust they should follow guidance set out in the Trust Whistleblowing Policy which can be found in the staffroom and academy staff shared drive.

## 14. Record-keeping

We will hold records on CPOMs.

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

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 pupils will be stored securely for the full period of time the pupil attends the academy. The file will then be transferred securely and promptly, within the first five days of the new term, to the secondary school the pupil transitions to from year 6 to year 7 and separately from the main pupil file (Information and Records Management Society (IRMS), 2019; Department of Education, 2016; Department for Education (DfE), 2021). 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.

If a pupil for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, within five working days or within the first five working days of a new term, and separately from the main pupil file (Information and Records Management Society (IRMS), 2019; Department of Education, 2016; Department for Education (DfE), 2021). 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.

Information is shared with other agencies via CPOMS.

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 whistle-blowing procedures and online safety (including expectations, applicable roles and responsibilities in relation to filtering and monitoring), to ensure they understand the school'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 drawn into terrorism and to challenge extremist ideas.

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will receive appropriate safeguarding training/induction and given a copy of this policy.

Volunteers will receive appropriate training/ induction. They are provided with all relevant safeguarding materials prior to assuming their role.

Principals are responsible for ensuring that all training is kept up to date and that the Trust safeguarding CPD profile is completed each academic year.

## 15.2 The DSL and Deputy

The DSL and deputy 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 AIC Members

All AIC members receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

Flick Training maintains a record of professional development for AIC members.

## 15.4 Recruitment – interview panels

At least one person conducting any interview for a post at the academy will have undertaken safer recruitment training. Safer recruitment training must be refreshed every four years in line with the Trust Safer Recruitment and Selection Policy. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education 2025, 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 Jaimie Holbrook, Vulnerable Pupils Officer and Rachel Cooper, Vulnerable Pupils Leader. 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
- Staff code of conduct
- Complaints Policy
- Health & Safety Policy
- Attendance Policy
- Online Safety
- Equality
- Sex and Relationships Education
- Whistleblowing
- IT Acceptable Use
- Allegations against staff
- Safer Recruitment and Selection Policy

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2025.**

## 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.

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

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

Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

Protect a child from physical and emotional harm or danger

Ensure adequate supervision (including the use of inadequate care-givers)

Ensure access to appropriate medical care or treatment

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

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

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' 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 Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months. We will record the DBS number but not a copy unless an offence is listed, in which case a copy will be retained until a risk assessment is completed.

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 via a pre-employment medical questionnaire.

Verify their right to work in the UK. We will record a copy of this verification on the SCR for the duration of the member of staff's employment and for up to 6 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

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

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 file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

**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 this happens only once and regardless of whether they are supervised or not

### Existing staff

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

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

We believe the individual has engaged in [relevant conduct, www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children](http://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children). Or:

The individual has received a caution or conviction for a relevant 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, www.legislation.gov.uk/ukxi/2009/37/contents/made](http://www.legislation.gov.uk/ukxi/2009/37/contents/made). Or:

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

The principal will liaise with HR before making a referral to the DBS.

### 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. All of this information is recorded on the SCR.

### Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school 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.

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

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

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 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 risks and control 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 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 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 risks and control measures put in place, and any advice sought

Record all volunteers on the SCR

### **Governance**

Trustees have strategic leadership responsibility for the Enquire Learning Trust's safeguarding arrangements.

All trustees, AIC members and members of the board will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check 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](#)).

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 pupil 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.

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign

exchange visit), we will request enhanced DBS checks with barred list information on those people.

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

### 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, including a supply teacher or volunteer, has:

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

Possibly committed a criminal offence against or related to a child, or

Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or

Behaved or may have behaved in a way that indicates they may not be suitable to work with children

It applies regardless of whether the alleged abuse took place in the school. 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 school so that the individual does not have direct contact with the child or children concerned

Providing an assistant to be present when the individual has contact with children

Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

#### Definitions for outcomes of allegation investigations

**Substantiated:** there is sufficient evidence to prove the allegation

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

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

#### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, (or where the headteacher is the subject of the allegation) – the ‘case manager’) will take the following steps:

Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the 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 designated officer as soon as practicably possible after contacting the police)

Immediately report the allegation to Lauren Pilgrim for advice on immediate actions and to ensure compliance with other policies eg discipline. Lauren will inform the Trust Vulnerable Pupils Officer Jaimie Holbrook or the Trust Vulnerable Pupils Leader, Rachel Cooper .

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from HR before any suspension is implemented.

**If immediate suspension is considered necessary**, agree and record the rationale for this with the HR officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school 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 designated officer 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 HR officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. This information will be outlined on correspondence from HR.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any

disciplinary process (in confidence.) HR will advise what to tell parents following the conclusion of a disciplinary process.

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

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the academy trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Additional considerations for supply staff**

If there are concerns or an allegation is made against someone not directly employed by the school, 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 local authority designated officer to determine a suitable outcome

The principal/ HR will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the 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.

### **Specific actions**

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

The case manager will discuss with the HR whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and HR will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and HR will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

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

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

### **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 pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

The person responsible for investigating these incidents should ensure that this is recorded in detail using the academy's CPOMs system so that the incident can be tracked from identification through to resolution.

### **Confidentiality**

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

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

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

### **Record-keeping**

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

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

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file.

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 personnel 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 local authority's designated officer to determine whether there are any improvements that we can make to the school'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

## Appendix 3.1 Low Level Concerns

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in appendix 3 of this policy.

### What is a low level concern?

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the academy may have acted in a way that:

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

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

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

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which the academy's values and expected behaviour, which are set out in the staff code of conduct, are constantly lived, monitored and reinforced by all staff.

Our open and transparent culture will support the academy to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the academy.

This policy alongside the staff code of conduct/behaviour policy will:

- empower staff to share any low-level safeguarding concerns.
- address unprofessional behaviour and support the individual to correct it at an early stage
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and,
- identify any weakness in the academy's safeguarding system.

At .... Primary, all concerns about all adults working in or on behalf of the academy, (including supply teachers, volunteers and contractors) will be dealt with promptly and appropriately

### Sharing low level concerns

If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the DSL....., who will make the decision on the next steps.
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of the Academy Improvement Committee.

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

Concerns raised in relation to supply staff or contractors will be raised with their employers so any potential patterns of inappropriate behaviour can be identified.

### Responding to low level concerns

The Headteacher/Principal/Chair of the Academy Improvement Committee will first ensure that it is a low level concern and should not be reclassified as a higher level concern/allegation. If it is deemed a higher level the procedure in appendix 3 will be followed.

Once this has been determined and the concern has been raised via a third party, the Headteacher/Principal/Chair of the Academy Improvement Committee:

will collect as much evidence as possible by speaking:

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

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for their decisions and action taken.

Most low level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way.

Any conversation with a member of staff following a concern will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate. It will explore what change is required in their behaviour, and identify if any support is required. There will be clear guidance about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required. Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate. Some concerns may be related to performance management and advice may be sought from the Enquire Learning Trust's HR manager.

### Recording of low level concerns

All low level concerns will be recorded in writing using the form on Appendix 3.2. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

The record will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the academy will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Consideration will also be given to whether there are wider cultural issues within the academy that enabled the behaviour to occur and where appropriate policies will be revised or extra training delivered to minimise the risk of it happening again.

The record will be retained at least until the individual leaves their employment.

### References

Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

A low level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

## Appendix 3.2

### Low Level Concern Log

|                                                              |               |                                                                                                |                |
|--------------------------------------------------------------|---------------|------------------------------------------------------------------------------------------------|----------------|
| <b>Academy:</b>                                              |               |                                                                                                |                |
| <b>Staff Member (Who the concern is with reference to)</b>   |               |                                                                                                |                |
| <b>Date</b>                                                  |               |                                                                                                |                |
| <b>Staff member: (with the concern/making the complaint)</b> |               | <b>Are you happy for your name to be shared with the staff member this log is relating to?</b> | <b>Yes/ No</b> |
| <b>Agency/Contractor</b>                                     | <b>Yes/No</b> | <b>Date Reported to Agency/Business</b>                                                        |                |

|                          |
|--------------------------|
| <b>Nature of Concern</b> |
|                          |

|                            |
|----------------------------|
| <b>Outline of Incident</b> |
|                            |

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|  |
|--|

| Action Taken |
|--------------|
|--------------|

|  |
|--|
|  |
|--|

Signed\_\_\_\_\_Date\_\_\_\_\_

Name \_\_\_\_\_ Position Principal

**Low Level Concerns Overview**

| Date | Nature of Complaint | Outcome/Any Further Action | Additional Comments |
|------|---------------------|----------------------------|---------------------|
|      |                     |                            |                     |
|      |                     |                            |                     |
|      |                     |                            |                     |
|      |                     |                            |                     |
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## Appendix 4: specific safeguarding issues

### Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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 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 the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### Children Absent from Education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

At ..... Primary we will follow this policy alongside [Working together to improve school attendance \(applies from 19 August 2024\) \(publishing.service.gov.uk\)](#) and the academy attendance policy to safeguard children.

### **Child exploitation- criminal, sexual or otherwise**

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 the local authority's children's social care team 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 CCE 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 the local authority's children's social care team and the police, if appropriate.

### **County Lines**

'County Lines' is a national issue involving the use of mobile phone 'lines' by groups to extend their drug dealing business into new locations outside of their home areas. This issue affects the majority of police forces and often includes the exploitation of vulnerable adults or children.

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

The national picture on county lines continues to develop but there are recorded cases of:

- Children as young as 12 years old being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.

### **Safeguarding children and young people linked to gang activity**

Indicators that children may becoming involved with gangs could be the following

Persistently going missing from school or home and / or being found out-of-area;

- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

If staff have a concern that a child is at risk of or is being criminally exploited they should follow their school's procedures raising a concern for the DSL who may follow this up with discussion with Children's Social Services and/or the police. Remember if you are aware a crime has been committed it should be reported directly to the police.

We will also endeavour to protect children and young people from exposure to gang activity and exploitation by having robust attendance and behaviour policies and to act on relevant information or allegations. We take all reports seriously and will share this information appropriately with other agencies to safeguard all children and young people from harm.

### Online Safety Including Filtering and Monitoring.

Leaders and staff ensure that the non-statutory guidance available in '[Teaching online safety in school](#)' (DfE, 2019) is considered when providing online safety advice to pupils.

The Information Governance Policy clearly states that mobile phone or electronic communications with a pupil is not acceptable other than for approved school business e.g. coursework, mentoring. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive communications, to enticing children to engage in sexually harmful conversations, harmful online challenges, online hoaxes, webcam photography, encouraging radicalisation or face-to-face meetings. **Misinformation, disinformation (including fake news) and conspiracy theories are safeguarding harms and must be addressed in line with statutory guidance.**

Where it is suspected that a child/young person is at risk from internet abuse or cyber bullying schools/establishments will report concerns to the appropriate agency.

The academy's **online safety policy** explains how we aim to keep pupils safe in school which includes **tested** filters and monitoring. Cyberbullying and sexting by pupils, via texts and emails, will be treated as seriously as any other type of bullying and in the absence of a child protection concern will be managed through our anti-bullying and confiscation procedures.

Filtering and monitoring is provided by the platform 'Securely'. Alerts are raised instantly to relevant personnel at school level. If a safeguarding threat is identified within the Securely platform it will be investigated and support will be directed to students and staff, where required.

**Alongside the use of our filtering and monitoring policy the academy follows the [Generative AI: product safety expectations – GOV.UK](#) in the safe use of generative Artificial Intelligence in education.**

Online safety forms part of the academy's curriculum.

### Abuse in intimate personal relationships between pupils (previously peer on peer abuse)

Staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting.

Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with child on child abuse. This could for example include:

- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing harm
- sexting- please see below.
- initiation/ hazing type violence and rituals

At ....Primary Academy we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. It is possible that girls are more likely to be victims and boys perpetrators but all child on child abuse is unacceptable and will not be tolerated.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this pupil
- indicates that young people outside the school may be affected by this pupil

At ... Primary Academy we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in school and other students. It is possible that girls are more likely to be victims and boys perpetrators but all child on child abuse is unacceptable and will not be tolerated. We will support the victims of child on child abuse by reporting any concerns to the DSL, contacting the police if it is of a serious nature, providing opportunities for children to seek emotional support from a member of the Wellbeing Team.

## Bullying

Is usually defined as behaviour that is:

- repeated
- intended to hurt someone either physically or emotionally
- often aimed at certain groups, for example because of race, religion, gender or sexual orientation

Is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

All incidences of bullying, including cyber-bullying, sexual bullying and prejudice-based bullying will be recorded and reported and will be managed through our behaviour and tackling-bullying procedures. Our PSCH work supports the planned for and regular focus on Bullying; there are also whole school foci and responsive work as necessary. We have recently included a whole school focus on Empathy to develop this work.

If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the Principal and the DSL's will consider implementing child protection procedures.

<https://www.childnet.com/resources/cyberbullying-guidance-for-schools>

**We have reviewed our Anti Bullying policy and procedures recently (Summer 23).**

## Child on child violence and sexual harassment

Academies should refer to Keeping Children Safe in Education 2025 for guidance on how to manage reports of child sexual violence and sexual harassment.

The DSL will make an informed response on a case-by-case basis using their professional judgement, supported by other agencies such as child's social services or the police as required. Any victim is reassured that their concerns are being taken seriously and that they will be supported and kept safe.

The DSL is trained to manage reports of child-on-child violence or sexual harassment. This means that the principles and procedures related to other safeguarding issues such as confidentiality and recording apply to these cases. CPOMs is used to maintain detailed records of these incidents and information is shared with the relevant adults. Recording includes the risk assessments for these pupils to keep them safe and these are kept under review by the DSL.

Aspects to consider are:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered.
- the victim will never be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them.
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour.
- the ages of the children involved.
- recognising an initial disclosure to a trusted adult may not be the first incident reported
- the developmental stages of the children involved.
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- Importance of understanding intra familial harms and any necessary support for siblings following incidents
- if the alleged incident is a one-off or a sustained pattern of abuse.
- are there ongoing risks to the victim, other children, adult or academy?
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;

The academy will support the victim throughout. Support is tailored on a case-by-case basis. This may include liaison with Children and Young People's Independent Sexual Violence Advisors (ChISVAs), Child and adolescent mental health services (CAMHS), rape crisis centres or the Internet Watch Foundation (to potentially remove illegal images)

Children who have experienced sexual violence can display a wide range of responses, so the academy will remain alert to the possible challenges of detecting those signs and show sensitivity to their needs.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While schools and colleges should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to,

not because it makes it easier to manage the situation. If required, the academy will provide a physical space for victims to withdraw.

Should the pupil move to another educational institution, the DSL ensures that the new institution is made aware of the incident so that support can be maintained.

Support is given to the perpetrator. It is important that the perpetrator is provided with an education, safeguarding support as appropriate and any disciplinary sanctions are implemented. This support will be tailored to the needs of the perpetrator. Again, if the perpetrator moves to another educational institution, the DSL ensures that the new establishment is aware of the incident.

### **Domestic abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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 school the following day. This is the procedure where police forces are part of [Operation Encompass](#) .

Operation Encompass also provides an advice and helpline service for all staff members who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

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 social care.

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

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM

- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### Forced marriage

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

It is a crime to carry out any conduct with purpose to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk)
- Refer the pupil 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 school 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 pupils 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 pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil 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

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 pupil, 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 school's measures to prevent radicalisation are set out in other school policies and procedures, including: online policy, PHSE and behaviour policy.

### The use of reasonable force

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

The Principal of the academy ensures that staff receive and maintain training to use positive handling techniques effectively and in the appropriate circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, staff consider the risks and recognise the additional vulnerability of these groups. They also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

More information can be found in the Positive Handling Policy.

### Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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 the visitors' book and wear a visitor's lanyard.

Visitors to the school 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 LA 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 school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff. Regular visitors carrying out domestic/maintenance duties are requested to attend out of school hours; if this is not possible, they are accompanied by a member of staff at all times.

### Non-collection of children

If a child is not collected at the end of the session/day, we will:

Contact the parent/carer via telephone, make a home visit (if appropriate and dependent on the distance), contact the (social care) and 999 if the child is believed to be in immediate danger. The incident to be recorded on CPOMs.

### Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. We contact parents and other adults on the contact forms, whilst looking for the child as appropriate and relating to the specific circumstances. . A senior member of staff will contact police and children's services as appropriate, meet with parents and keep an overview of the situation. The circumstances will be detailed in cpoms. If a child is designated as missing from education, we follow the procedures from the Local Authority and make the appropriate referral. This would also be captured on CPOMs.