PLT Child Protection and Safeguarding Policy (including safer recruitment, allegations against staff and low-level concerns) 2025-2026

Approved by:	Academy Council	**Date:** September 2025
Last reviewed on:	September 25	
Next review due by:	September 26	

Contents

Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Mark Browne	Mbrowne@evolveacademy.org.uk
Deputy DSL (Safeguarding team)	Simon Tolaram Catharine Maddock Ronan Stewart Ziggy Moore	Stolaram@ evolveacademy.org.uk 0207 504 0542 cmaddock@evolveacademy.org.uk 0207 504 0542 rstewart@evolveacademy.org.uk zmoore@evolveacademy.org.uk
Head Teacher (Deputy DSL)	Melissa Williams	Mwilliams@plt.org.uk 0207 504 0542
Local Authority Designated Officer (LADO)	Andrew Zachariades	LADO@lambeth.gov.uk 020 7926 4679
Designated Teacher for Looked-after and previously looked-after children (section 11)	Zina Bourreza	zbourreza@evolveacademy.org.uk
Chair of Local Governing Body	Rachel Goode	rgoode@evolveacademy.org.uk
Link Governor for Safeguarding	Alice Dias	adias@evolveacademy.org.uk
Channel helpline for school staff and governors		counter.extremism@education.gov.uk 020 7340 7264
Children's Services team and Emergency Duty Team		Professional line: 020 7926 3100 Public Line: 020 7926 5555 (24 hours) helpandprotection@lambeth.gov.uk https://www.lambethsaferchildren.org.uk/

The Multi Agency Assessment and Referral Form (MAARF)

If you are using for the first time, please register via this link.

1. Aims

The academy aims to ensure Appropriate action is taken promptly to safeguard and promote children's welfare › All staff are aware of their statutory responsibilities concerning safeguarding， Staff are Appropriately trained in recognizing and reporting safeguarding issues

2. Legislation and Statutory Guidance

This Safeguarding and Child Protection Policy is informed by the most up-to-date legislation and statutory guidance to ensure that Evolve Academy meets its legal and moral responsibilities to safeguard all children in our care.

It is based on the following key Department for Education (DfE) documents:

- **Keeping Children Safe in Education (KCSIE), 2025** – statutory guidance for all schools and colleges in England
- **Working Together to Safeguard Children, 2018** – a guide to inter-agency working to safeguard and promote the welfare of children
- **Governance Handbook** – guidance on the roles and duties of governing boards, including their responsibilities for safeguarding

We also follow the **local safeguarding arrangements** as agreed and published by our three local safeguarding partners. (See Section 3 of this policy for more details.)

In addition, this policy complies with the following legislation:

- **Section 175 of the Education Act 2002** – requires schools and local authorities to safeguard and promote the welfare of pupils
- **The School Staffing (England) Regulations 2009** – outlines safer recruitment requirements, including single central record obligations and training for interviewers
- **The Education (Independent School Standards) Regulations 2014, Part 3** – sets safeguarding standards for academies and independent schools
- **The Children Act 1989 and 2004 (Amendment)** – provides the legal framework for the care and protection of children
- **The Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)** – places a legal duty on teachers to report known cases of FGM involving under-18s directly to the police
- **Statutory Guidance on Female Genital Mutilation** – outlines responsibilities to safeguard and support affected girls
- **The Rehabilitation of Offenders Act 1974** – explains when individuals with criminal records may work with children
- **The Safeguarding Vulnerable Groups Act 2006, Schedule 4** – defines regulated activity with children and the associated legal responsibilities
- **Prevent Duty Guidance (Counter-Terrorism and Security Act 2015)** – sets out schools' responsibilities in protecting pupils from the risks of radicalisation and extremism
- **The Human Rights Act 1998** – highlights how abuse, including sexual abuse or harassment, may breach fundamental human rights
- **The Equality Act 2010** – prohibits discrimination against individuals based on protected characteristics, including race, sex, disability, sexual orientation, and gender reassignment. The Act also enables positive action to support disadvantaged pupils, including reasonable adjustments for those with disabilities or those affected by sexual violence or harassment
- **The Public Sector Equality Duty (PSED)** – requires the school to have due regard for eliminating unlawful discrimination, harassment, and victimisation, with a focus on improving outcomes for vulnerable groups

- **The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018** and **Childcare Act 2006** – identify individuals disqualified from working with children

3.Safeguarding
At Evolve Academy, safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's mental or physical health and development
- Ensuring that children grow up in safe and nurturing environments that provide effective care
- Taking proactive steps to ensure all children achieve the best possible outcomes

Child Protection
Child protection is a core component of safeguarding. It refers to the specific activities undertaken to protect children who are suffering, or are likely to suffer, significant harm.

Abuse
Abuse is a form of maltreatment. A child may be abused through inflicting harm or by failing to act to prevent harm. Abuse can occur in a family, institutional, or community setting, by people known to the child or by strangers. Further detail on types of abuse is provided in *Appendix 1*.

Neglect
Neglect is a type of abuse and involves the persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of the child's health or development.

Educational Neglect

Educational neglect is defined as the persistent failure of a parent or carer to ensure a child receives an appropriate education, either through regular school attendance or otherwise in accordance with the law. This includes situations where parents or carers fail to engage with the school, do not support their child's attendance, or place avoidable barriers in the way of their child accessing education.

Educational neglect is recognised as a safeguarding concern because it denies the child their right to education as set out in Article 28 of the United Nations Convention on the Rights of the Child (CRC) and can significantly impact their safety, wellbeing, and life chances.   A detailed definition is also available in *Appendix 1*.

Sharing of Nudes and Semi-Nudes
Also known as **sexting** or **youth-produced sexual imagery**, this refers to children sharing nude or semi-nude images, videos, or live streams of themselves or others. Such incidents must always be treated as a safeguarding concern.

Children
In the context of this policy, "children" refers to everyone under the age of 18.

Safeguarding Partners

In line with *Keeping Children Safe in Education (2025)* and the *Children Act 2004* (as amended by the *Children and Social Work Act 2017*), the following three safeguarding partners are responsible for coordinating local safeguarding arrangements:

- The **Local Authority (LA)**
- The **Integrated Care Board (ICB)** – formerly Clinical Commissioning Group
- The **Chief Officer of Police** for the local policing area

These partners work collectively to safeguard and promote the welfare of all children in the local area.

Victim

While "victim" is a commonly used and legally recognised term, we understand that not all children who experience harm or abuse will identify with or wish to be labelled as a victim. In managing such incidents, we will use the language that the individual child is most comfortable with, where appropriate.

Alleged Perpetrator(s) / Perpetrator(s)

The terms "alleged perpetrator" and "perpetrator" are widely recognised and may be used in formal contexts. However, we are mindful of how such language may impact children, including those who may themselves be vulnerable or experiencing harm. We will carefully consider and use appropriate language on a case-by-case basis.

4. Equality Statement

At Evolve Academy, we are committed to promoting equality, diversity, and inclusive safeguarding practice. We recognise that some children are more vulnerable to abuse—both online and offline—and that additional barriers may exist which make it more difficult for some children to recognise, report, or disclose harm.

We are committed to anti-discriminatory practice and ensure that **all children receive equal protection**, regardless of their background or circumstances. Our safeguarding procedures are responsive to the needs of individual children and their families.

We give particular consideration to children who may be especially vulnerable, including those who:

- Have special educational needs and/or disabilities (SEND), or ongoing physical or mental health conditions (see Section 10)
- Are young carers
- May experience discrimination or marginalisation due to their race, ethnicity, religion, gender identity, or sexual orientation
- Have English as an additional language
- Are living in challenging family circumstances, such as those involving substance misuse, domestic abuse, or temporary housing
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers or refugees
- Are affected by mental health needs—either their own or those of a family member
- Are looked after by the local authority, or have previously been in care (see Section 12)
- Are frequently absent from education or missing from school for extended or repeated periods

- Have parents or carers who have expressed an intention to remove them from school for the purposes of elective home education

5.Roles and Responsibilities

At Evolve AcademyAcademy, safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, contractors, and Academy Council members and aligns with the procedures outlined by our three local safeguarding partners. It also extends to all off-site activities and alternative provision.

We are committed to a whole-academy approach to safeguarding that includes preventative education. Our curriculum and pastoral support systems foster a culture of zero tolerance towards all forms of abuse, discrimination, and harmful behaviours, including:

- Sexism, misogyny/misandry
- Homophobia, biphobia, and transphobia
- Sexual violence and sexual harassment

This is supported by:

- Our Behaviour Policy
- Pastoral Support and Early Help interventions
- A planned, inclusive RSHE programme that regularly addresses:
    - Healthy, respectful relationships
    - Consent and boundaries
    - Stereotypes, prejudice, and equality
    - Body confidence and self-esteem
    - Abuse and coercive control
    - Sexual consent, exploitation, grooming, harassment, and domestic abuse
    - Honour-based abuse including forced marriage and FGM
    - Reporting pathways and how to access help

5.1 All Staff

All staff must read and understand **Part 1 and Annex B** of *Keeping Children Safe in Education (KCSIE)*, and confirm this by signing a declaration at the start of each academic year.

All staff will:

- Be familiar with key safeguarding documents, including:
    - This policy
    - The Evolve Academy Staff Code of Conduct
    - Behaviour and Online Safety Policies
    - Identity and role of the DSL and deputies
    - Procedures for reporting concerns (via the **Sleuth Purple Concern Button**)
- Understand their role in Early Help and statutory referrals
- Know how to respond to disclosures and maintain appropriate confidentiality
- Recognise the signs of abuse, including:
    - Child-on-child abuse
    - Child sexual and criminal exploitation (CSE/CCE)
    - County lines involvement
    - Radicalisation, FGM, serious violence
- Provide a safe space for LGBTQ+ pupils to speak openly

- Promote online safety with pupils and their families
- Reassure children who disclose abuse that they are believed, supported, and protected
- Understand that abuse can happen anywhere—including at home, online, and in school

Staff are further supported as outlined in Section 15 and Appendix 4 of this policy.

5.2 Designated Safeguarding Lead (DSL)

Our **Designated Safeguarding Lead (DSL)** is **Mark Browne**, a senior member of staff with lead responsibility for safeguarding and child protection, including online safety.

📧 Contact: **mbrowne@evolveacademy.org.uk**

The DSL will:

- Be available during school hours to respond to safeguarding concerns
- Lead safeguarding practices, including filtering and monitoring processes
- Support staff with advice and guidance
- Attend or delegate attendance at inter-agency meetings
- Make referrals to external agencies when necessary (e.g. social care, police, Channel)
- Understand harmful sexual behaviour and local procedures
- Be the central link between Evolve Academy and external safeguarding agencies
- Ensure appropriate adults are present for any police investigations involving students
- Keep the headteacher informed of serious safeguarding concerns

Deputy DSLs will support and step in during any absence of the DSL. Full responsibilities are detailed in the DSL's job description.

5.3 Academy Council

The **Academy Council** will:

- Ensure safeguarding is a core part of school culture and decision-making
- Approve and review this policy regularly and hold the headteacher accountable for its implementation
- Appoint a designated safeguarding lead governor separate from the DSL
- Monitor the effectiveness of safeguarding procedures, including filtering and monitoring systems
- Review training and ensure staff knowledge is up to date and in line with local safeguarding partner guidance
- Read *Keeping Children Safe in Education* in full
- Ensure online safety is a consistent and embedded theme throughout safeguarding
- Require that any external provider using academy premises complies with Evolve Academy's safeguarding expectations

In the event of an allegation against the headteacher, the **PLT Safeguarding Lead** will act as the case manager (see Appendix 3).

5.4 Headteacher

The **Headteacher** is responsible for:

- Ensuring all staff, including volunteers and agency workers, receive safeguarding induction and ongoing training
- Communicating the safeguarding policy to families and publishing it on the website
- Supporting the DSL with adequate time, training, and resources
- Acting as case manager for allegations against staff (except where this involves the headteacher)
- Making decisions regarding low-level concerns in consultation with the DSL, if needed

5.5 Virtual School Heads

Virtual School Heads have a non-statutory responsibility to oversee the educational outcomes of children with a social worker. They should:

- Work with DSLs, SENCOs, mental health leads, and social workers
- Identify barriers to attendance, progress, or wellbeing
- Support multi-agency efforts to improve outcomes

6. Confidentiality and Information Sharing

Maintaining confidentiality is a critical aspect of safeguarding. At Evolve Academy, we follow statutory guidance to ensure that information is shared appropriately, securely, and in the best interests of the child.

6.1 Confidentiality

All staff must:

- Never promise confidentiality to a child where safeguarding is concerned
- Only share information with professionals who need it to protect the child
- Report safeguarding concerns immediately to the DSL or Deputy DSL via Sleuth

6.2 Information Sharing

We recognise that **timely and effective information sharing** is essential for identifying risk and delivering early help or protective action. Staff are expected to:

- Share relevant concerns early to avoid escalation
- Liaise with social care, police, and other agencies as appropriate
- Ensure child protection records are transferred securely when a pupil changes school

6.3 Principles for Information Sharing

All information shared should be:

- **Necessary and proportionate**
- **Relevant and adequate**
- **Accurate and up to date**
- **Timely**
- **Securely handled**

- **Clearly recorded**, including with whom, why, and the outcome

6.4 Legal Framework

Evolve Academy adheres to:

- Data Protection Act 2018
- UK GDPR
- *Working Together to Safeguard Children* (2018)
- *Keeping Children Safe in Education* (2024)

6.5 Multi-Agency Working

Our DSL works closely with:

- Social care
- Health services
- Police
- Early help teams
- Local safeguarding partners

We contribute to:

- Child protection conferences
- Strategy discussions
- Core groups
- Local safeguarding reviews

6.6 Parental Involvement

We involve parents and carers unless doing so:

- Places the child at greater risk, or
- Is not in the child's best interest

Parents are informed of safeguarding practices upon admission and via our website.

6.7 Training

All staff will be trained in confidentiality and information sharing as part of safeguarding induction and regular updates. Training will include:

- How to recognise when to share information
- Legal duties and professional judgement
- Secure methods for data sharing

7. Recognising Abuse and Taking Action

All staff, volunteers, and Academy Council members at Evolve Academy must follow the procedures outlined in this section if they have any safeguarding concerns.

Note: Throughout this policy, any reference to the **Designated Safeguarding Lead (DSL)** also includes the **Deputy DSL**, where applicable.

7.1 If a Child Is Suffering, Likely to Suffer Harm, or in Immediate Danger

If you believe that a child is at risk of **significant harm**, or is in **immediate danger**, you must take action **without delay**.

- **Make an immediate referral** to either:
  - **Children's Social Care**, and/or
  - **The police**

Any member of staff can make a referral directly.

- If you do make a referral yourself, you must **inform the DSL as soon as possible** to ensure appropriate follow-up and ongoing safeguarding measures.

Local Referral Procedures (Westminster)

To report a safeguarding concern in Westminster:

- Complete the **Multi-Agency Referral Form (MARF)** via the Lambeth   (Multi-Agency Safeguarding Hub):
  - Report a concern about a child – Lambeth
- Contact:
  - 📞 **Children's Services Duty Line:** 020 7926 3100
  - ✉️ **Email:**

If the child resides in a different borough (e.g. Lewisham, Southwark, etc.), you must contact the relevant **local authority**.

You may also refer to the national government website:

🔗 Report child abuse to your local council

7.2 If a Child Makes a Disclosure to You

If a child discloses a safeguarding concern, it is vital that you respond **calmly, supportively, and in line with safeguarding procedures**.

You must:

- **Listen carefully** and **take the child seriously**. Give them time to speak freely—**do not interrupt** or ask leading questions.
- Remain **calm and composed**. Avoid reacting with shock, disbelief, or judgment.
- Reassure the child that they've done the right thing by speaking up. **Do not criticise them for any delay** in telling someone.

- **Explain what will happen next**. Make it clear that you cannot promise confidentiality, as the information will need to be passed on to help keep them safe.
- **Record the disclosure as soon as possible**, using the child's own words. **Do not add personal opinions, assumptions, or interpretations**.
- **Sign and date** your written record and pass it to the DSL without delay.

If appropriate, you may also make a direct referral to **Children's Social Care** and/or the **police** (see section 7.1). If you do this, **inform the DSL as soon as possible**.

⚠️ Do not share the disclosure or any related information with anyone **other than the DSL,**

Important Considerations:

Some children may:

- **Not know how** to share what has happened to them.
- **Not recognise** their experiences as abuse, exploitation, or neglect.
- Feel **embarrassed, ashamed, or frightened**, especially if they are vulnerable, disabled, have communication difficulties, or face discrimination due to their identity.

These barriers must not stop staff from acting. You are expected to exercise **professional curiosity**—if something feels wrong, **speak to the DSL**.

7.3 If You Discover That Female Genital Mutilation (FGM) Has Taken Place or a Pupil Is at Risk

Female Genital Mutilation (FGM) is defined in *Keeping Children Safe in Education (KCSIE)* as **"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 is considered a **serious form of child abuse** with long-lasting physical and emotional impacts.
- FGM may also be referred to as **'female circumcision', 'cutting',** or **'initiation'**.
- Indicators that a pupil may have been subjected to FGM or may be at risk are detailed in **Appendix 4** of this policy.

Mandatory Reporting Duty for Teachers

Under the **mandatory reporting duty**, **any teacher** who:

- **Is told directly by a girl under 18** that FGM has been carried out on her; **or**
- **Observes physical signs** suggesting FGM has been carried out on a girl under 18, and **has no reason to believe the procedure was necessary for medical reasons**

Must report this to the police immediately and personally.
Failure to do so is a **legal offence** and may result in **disciplinary action**.

Where appropriate and unless instructed otherwise, teachers should also:

- **Inform the Designated Safeguarding Lead (DSL)** at Evolve AcademyAcademy.
- **Refer the matter to Children's Social Care**.

All Other Staff Responsibilities

Any **other member of staff** who becomes aware that FGM **may have been carried out** on a pupil under 18 must:

- Report the concern **immediately to the DSL**.
- **Follow the academy's safeguarding procedures**.
  This includes using the **Sleuth Purple Concern Button** to log and escalate the issue appropriately.

! Staff must **not physically examine** pupils to confirm suspicions of FGM.

If a Pupil Is at Risk of FGM

If a staff member suspects that a pupil may be at risk of FGM—but it is not known to have been carried out—they must:

- **Speak to the DSL without delay**.
- Log their concerns via the **Sleuth Purple Concern Button** in line with our safeguarding protocols.
- Support any referral process led by the DSL, which may involve **Children's Social Care** or other appropriate agencies.

7.4 If You Have Concerns About a Child's Welfare (But Do Not Believe They Are in Immediate Danger)

If you have concerns about a child's welfare that do not indicate immediate harm or danger, you should follow the steps below. The safeguarding procedure flowchart (Figure 1, before section 7.7) provides a visual guide to this process.

- **Whenever possible, speak to the Designated Safeguarding Lead (DSL)** first to discuss your concerns and agree on the next steps.
- If the DSL is unavailable due to exceptional circumstances, do **not delay taking action**. In this case:
    - Speak to a member of the Senior Leadership Team (SLT), and/or
    - Seek advice from local authority children's social care.
    - You can also contact the NSPCC helpline anytime at **0808 800 5000** for guidance.
- Always inform the DSL of any action taken as soon as practically possible.

Early Help Assessments

- If it is appropriate to initiate an **Early Help Assessment**, the DSL will usually lead on coordinating with other agencies and professionals.
- Staff may be asked to support or even act as the lead practitioner in this process.
- Evolve AcademyAcademy works in partnership with statutory safeguarding partners to agree thresholds for different levels of assessment and intervention.
- The DSL will continuously monitor the case and, if there is no improvement in the child's situation, will consider making a referral to children's social care. Timelines and effectiveness of interventions will be regularly reviewed.

Please refer to our local procedures for Early Help Assessments for detailed guidance.

Referrals to Children's Social Care or Police

- When a referral to local authority children's social care or the police is necessary, the DSL will normally make the referral or support you in doing so.
- If you make a direct referral yourself (see section 7.1), you must notify the DSL immediately afterward.
- The local authority is required to make a decision within **one working day** of receiving a referral and inform the referrer of the outcome.
- If you do not receive feedback or the child's situation does not improve, you or the DSL must follow up and escalate concerns through the local safeguarding escalation procedures.
- All referrals, outcomes, and subsequent actions must be properly recorded.
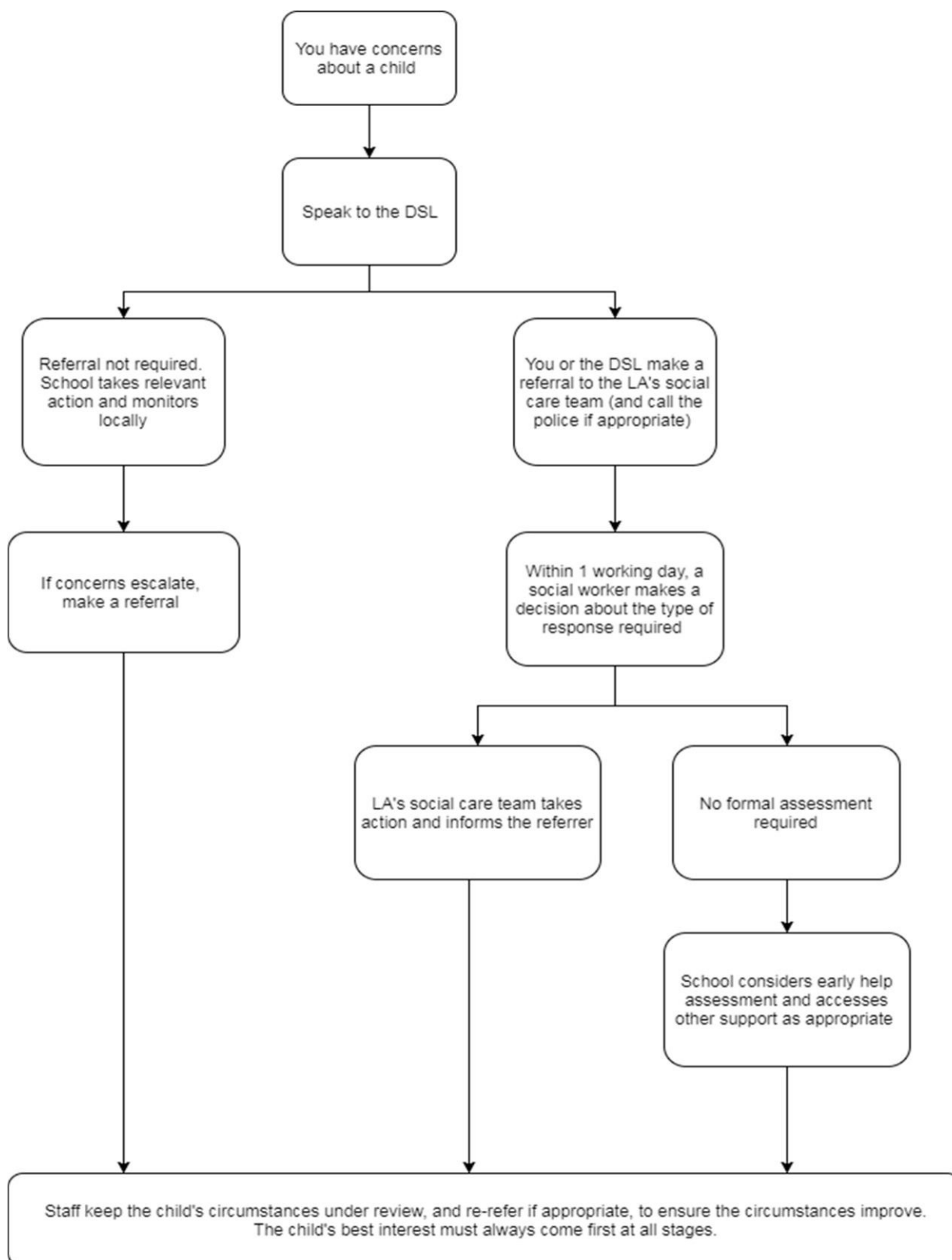
7.5 If You Have Concerns About Extremism

- If a child is not currently suffering harm, is not likely to suffer harm, and is not in immediate danger, try to speak with the Designated Safeguarding Lead (DSL) first to agree on the best course of action.
- If the DSL is unavailable in exceptional circumstances, do not let this delay necessary action. Instead, speak to a member of the senior leadership team and/or seek advice from the local authority children's social care. If appropriate, make a direct referral to local authority children's social care (see 'Referral' section above). Inform the DSL or deputy as soon as possible after making the referral.
- When a concern is raised, the DSL will assess the level of risk and decide which agency to contact. This may include referring to Channel—the government's program that identifies and supports individuals at risk of being drawn into terrorism—or the local authority children's social care team.
- The Department for Education (DfE) offers a dedicated helpline for school staff and governors to raise concerns about extremism relating to a pupil. You can call 020 7340 7264 or email counter.extremism@education.gov.uk. Please note, this helpline is not for emergencies.
- In an emergency, call 999 immediately or the confidential anti-terrorist hotline at 0800 789 321 if you:
  - Believe someone is in immediate danger.
  - Suspect someone is planning to travel to join an extremist group.
  - Witness or hear something that may be related to terrorism.

7.6 If You Have a Concern About Mental Health

- Mental health issues can sometimes indicate that a child has experienced, or is at risk of experiencing, abuse, neglect, or exploitation.
- Staff should be attentive to behavioural signs that may suggest a child is struggling with their mental health or may be at risk of developing a problem.
- If your mental health concern is also a safeguarding concern, act immediately by following the steps outlined in section 7.4.
- If your mental health concern is not linked to safeguarding, discuss it with the Designated Safeguarding Lead (DSL) to decide on the best course of action.
- Additional details about how to identify mental health issues, routes for escalation, referral processes, and accountability should be included in your procedures.
- For further guidance, refer to the Department for Education's advice on mental health and behaviour in schools.

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)

```
┌─────────────────────┐
│ You have concerns   │
│ about a child       │
└─────────────────────┘
          │
          ▼
┌─────────────────────┐
│ Speak to the DSL    │
└─────────────────────┘
```

You have concerns about a child

Speak to the DSL

Referral not required. School takes relevant action and monitors locally

If concerns escalate, make a referral

You or the DSL make a referral to the LA's social care team (and call the police if appropriate)

Within 1 working day, a social worker makes a decision about the type of response required

LA's social care team takes action and informs the referrer

No formal assessment required

School considers early help assessment and accesses other support as appropriate

Staff keep the child's circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The child's best interest must always come first at all stages.

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

Figure 2 : Procedure if a Child have concerns about another child's welfare or their own welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

Safeguarding Referral Flowchart for Student

Are you worried about yourself or another stulent's safety or wellbeing?

↓

Tell a trusted adult in school straight away:
This could be:
- A teacher   A teaching
  assistant   Any other staff

↓

The adult will listen and take your concern seriously.

↓

They will pass your concern to a Designated Safeguarding Lead (DSL) or Deputy DSL.

↓

The DSL will decide what to do next.
This may include:
- Offering you support in school
- Speaking with your parents/carrers (it safe to do so)
- Contacting children's social care or other services if needed

↓

You will be kept safe, and someone will check in with you to make sure you worrıted. You will always be taken seriously.

7.7 Concerns About a Staff Member, Supply Teacher, Volunteer, or Contractor

- If you have concerns or receive an allegation about a staff member, supply teacher, volunteer, or contractor posing a risk of harm to children, you should report it to the principal immediately.
- If the concern or allegation involves the principal, report it directly to the chair of the academy council.
- The principal, chair of the academy council, chair of trustees, or HR manager will then follow the procedures outlined in Appendix 3, if appropriate.
- If you believe there is a conflict of interest in reporting your concern or allegation to the principal, you must report it directly to the local authority designated officer (LADO).

7.8 Allegations of Abuse Made Against Other Pupils

We acknowledge that children can abuse their peers in various ways, including:

- Bullying or initiation/hazing-type violence.
- Physical abuse such as hitting, kicking, shaking, biting, or hair pulling.
- Sexual violence and sexual harassment.
- Upskirting — taking a photo under someone's clothing without their knowledge for sexual gratification or to cause distress.
- Sexting and initiation/hazing rituals.

You may adjust this list to fit your school's context.

- Abuse among pupils will never be dismissed as "banter," "just having a laugh," or "part of growing up."
- We recognize that peer-on-peer abuse often has a gendered element, but all such abuse is unacceptable and will be taken seriously.
- Most incidents of pupils harming other pupils will be managed under the school's behaviour policy. However, this safeguarding policy applies when allegations raise safeguarding concerns, such as when the behaviour:
  - o Is serious or potentially criminal.
  - o Puts other pupils at risk.
  - o Is violent.
  - o Involves pupils being forced to use drugs or alcohol.
  - o Involves sexual exploitation, abuse, or harassment (e.g., indecent exposure, sexual assault, or inappropriate sexual images or videos, including sexting).

If a pupil makes an allegation against another pupil:

- Record the allegation and report it to the Designated Safeguarding Lead (DSL) immediately. Do not investigate the matter yourself.
- The DSL will contact local authority children's social care and follow their guidance, and involve the police if a criminal offence may have occurred.

- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – 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 minimize the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualized language or behavior.
- Being vigilant to issues that particularly affect different genders – for example, sexualized 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 behavior and consent.
- Ensuring pupils know they can talk to staff confidentially by informing them through school assemblies, posters, and the use of worry 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.

7.8.1 Sharing of Nudes and Semi-Nudes (Sexting)

At **Evolve Academy**, we take all incidents involving the **consensual or non-consensual sharing of nudes and semi-nudes** extremely seriously. Our safeguarding response to these incidents is fully aligned with the most recent guidance, including:

- **UK Council for Internet Safety (UKCIS)**: *Sharing nudes and semi-nudes: advice for education settings working with children and young people*
- **Department for Education (DfE)**: *Searching, Screening and Confiscation: Advice for Schools (2022)*
- **Keeping Children Safe in Education (KCSIE 2025)**

We recognise that incidents of sharing nudes and semi-nudes expose children and young people to a wide range of **safeguarding and emotional risks**, including:

- Coercion, exploitation, and criminal behaviour
- Gender-based pressure and reinforcement of harmful stereotypes
- The objectification and sexualisation of girls
- Online harassment, blackmail, and extortion
- Cyberbullying and peer victimisation
- Loss of control over personal images, which may be shared without consent

Our Approach at Evolve Academy

All incidents involving the sharing of nudes and semi-nudes will be **treated as safeguarding concerns** and managed in line with our **Child Protection and Safeguarding Policy**, incorporating the **six UKCIS principles** for handling such incidents:

1. **The best interests of the child come first**
2. **Safeguarding is everyone's responsibility**

3. **Children and young people should be empowered to report concerns**
4. **Incidents should be handled promptly, proportionately, and sensitively**
5. **All decisions must be based on a thorough assessment of risk**
6. **Support should be provided for all children involved, including those who may have acted inappropriately**

We do not criminalise children unnecessarily, and responses are always **proportionate and trauma-informed**. However, where there is evidence of **coercion, exploitation, or intent to harm**, referrals to external safeguarding agencies or the police may be made in line with statutory guidance.

Our procedures include:

- Ensuring a trained **Designated Safeguarding Lead (DSL)** or deputy handles the incident
- Risk-assessing the situation and recording all decisions and actions clearly
- Supporting both the child whose image has been shared and, where appropriate, the child who shared it
- Confiscating, securing, and (if necessary) deleting any devices or material in line with **DfE Searching and Confiscation guidance**
- Engaging with **parents/carers** unless doing so would place the child at further risk
- Liaising with **external agencies** (e.g. police, social care) if the incident warrants escalation

Curriculum and Prevention

Preventive education is embedded across the **PSHE, RSHE, and computing curriculum**, and reinforced through assemblies, workshops, and pupil voice activities. This includes:

- Promoting healthy relationships and body confidence
- Teaching about consent, coercion, and peer pressure
- Raising awareness of the legal and emotional consequences of sharing intimate images
- Encouraging a culture of **respect, digital responsibility, and open dialogue**

We are committed to a **whole-academy approach to safeguarding**, where digital safety and personal wellbeing are central to the learning experience and school culture.

7.8.2 Reporting systems for pupils

Set out how your pupils can raise safeguarding concerns and the procedures staff should follow when they do so.

Our school's approach includes the following:

- Systems that are well promoted, easily understood, and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously.

  All students have a raft of intervention spaces were there are positive relationship's ,Counselling , S.A.L.T and school were students are in a safe and trusted space and are able to disclose

7.10.2 How Sleuth Supports Safeguarding – Evolve Academy

At Evolve Academy, **Sleuth** is an integral part of our safeguarding infrastructure, supporting early identification, consistent recording, and effective intervention. The system strengthens our ability to monitor, assess, and respond to behavioural and safeguarding concerns across the academy.

Key safeguarding benefits of using Sleuth include:

- **Early Identification**
  By consistently recording behavioural incidents, Sleuth enables staff to spot early warning signs of safeguarding concerns, such as sudden changes in behaviour, patterns of withdrawal, aggression, or signs of distress that may indicate abuse, neglect, or other forms of harm.
- **Comprehensive Monitoring**
  Sleuth supports the ongoing tracking of both individual pupils and wider pupil groups, helping to ensure that no behaviour-related safeguarding concern goes unnoticed or unaddressed.
- **Data-Driven Decision Making**
  The system generates detailed reports that provide valuable insights into trends and behaviours. These reports help to inform evidence-based safeguarding strategies, interventions, and referrals.
- **Consistency Across the Academy**
  Sleuth ensures a unified and standardised approach to behaviour recording, meaning safeguarding-related incidents are logged and managed consistently by all staff.
- **Real-Time SLT Notifications**
  As soon as a safeguarding concern is logged in Sleuth, **all members of the Senior Leadership Team (SLT)** receive immediate notification. This ensures prompt oversight, coordinated response, and timely escalation where needed.

  Sleuth plays a key role in our **whole-academy approach to safeguarding**, ensuring behaviour and welfare are closely linked and that the right people are informed at the right time to take appropriate action.

`   **7.10.3 Staff Responsibilities**

- **Recording Incidents:** Staff members are responsible for accurately recording all behavior incidents in Sleuth, ensuring that all relevant details are included.
- **Monitoring and Reporting:** The DSL and other designated staff members regularly monitor the data in Sleuth to identify any safeguarding concerns. Any significant findings are reported and acted upon in accordance with our safeguarding procedures.
- **Training:** All staff are trained in using the Sleuth system effectively to ensure accurate and

consistent recording of behavior incidents.

7.10.4 Action and Intervention

When the Sleuth system identifies a potential safeguarding concern, the following actions are taken:

7.10.4.1 **Assessment:** The DSL assesses the data and determines the level of concern, considering the context and any other relevant information.

7.10.4.2 **Referral:** If necessary, the DSL will make a referral to children's social care or other relevant agencies in line with section 7.4 of this policy.

7.10.4.3 **Support Plans:** The DSL will develop support plans for the involved students, coordinating with staff, parents, and external agencies as needed.

7.10.4.4 **Follow-Up:** The DSL will ensure ongoing monitoring and follow-up to assess the effectiveness of the interventions and make adjustments as necessary.

7.10.5 Review and Evaluation

The use of Sleuth as part of our safeguarding strategy is regularly reviewed and evaluated to ensure its effectiveness. Feedback from staff and data analysis are used to make improvements to the system and our safeguarding practices.

By integrating the Sleuth Behaviour Monitoring System into our safeguarding framework, Evolve Academy is committed to creating a safer and more supportive environment for all students.

7.11 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.

Section 8. Online Safety and Use of Mobile Technology

In line with the **Department for Education (DfE) guidance** and the statutory requirements set out in **Keeping Children Safe in Education (KCSIE) 2025**, Evolve Academy recognises the critical importance of protecting children from risks posed by online activity and the misuse of mobile and digital technology.

The updated KCSIE 2025 places increased emphasis on whole-school responsibility for online safety, the integration of online safety within safeguarding practice, and the role of leadership in ensuring a strong culture of digital safeguarding. Evolve Academy is committed to upholding these principles through a comprehensive and preventative approach.

Our Approach Includes:

- **Curriculum Integration**
  Online safety is embedded across the curriculum—particularly in PSHE, computing, and tutor time—to ensure students are equipped with the knowledge and skills to navigate the digital world safely. This includes education on cyberbullying, online grooming, radicalisation, fake news, self-generated imagery, and exposure to harmful content.
- **Whole-School Digital Safeguarding Culture**
  Online safety is viewed as a whole-school safeguarding priority. All staff are expected to remain vigilant to online risks and to take action in accordance with Evolve Academy's safeguarding procedures.
- **Safe Use of Mobile Technology**
  In accordance with KCSIE 2025, Evolve Academy maintains clear expectations regarding the responsible use of mobile phones and personal devices. Mobile phones must not be used during the school day without staff permission. Misuse of mobile technology will be addressed promptly and may involve parental involvement and further safeguarding measures where appropriate.
- **Filtering and Monitoring**
  We use robust internet filtering and monitoring systems to restrict access to harmful content and detect concerning behaviour. These systems are regularly reviewed in line with statutory guidance and best practice recommendations.
- **Staff Training and Responsibilities**
  All staff receive regular training on online safety, including the latest emerging risks, reporting procedures, and how to support pupils who may be at risk of or affected by online harm. Designated Safeguarding Leads (DSLs) have enhanced training in digital safeguarding.
- **Parental Engagement**
  Parents and carers are provided with information, guidance, and resources to support online safety at home. We actively encourage a partnership approach to managing digital risks and promoting responsible technology use.
- **Responding to Incidents**
  Any concerns relating to online safety—including sexting, online abuse, or use of technology to harm others—will be treated as safeguarding matters and managed according to our Safeguarding and Child Protection procedures.

Evolve Academy is committed to building a digitally safe environment in which students can learn, interact, and explore responsibly and without risk of harm.

8.1 Robust Processes and Guidelines

Our academy is committed to maintaining robust processes, including filtering and monitoring systems, to ensure the online safety of pupils, staff, volunteers, and governors. We aim to protect and educate our entire school community on the safe and responsible use of technology, including mobile phones.

8.2 Categories of Risk

To address the various risks associated with online activities, we categorize risks into four key areas:

1. Exposure to illegal, inappropriate, or harmful online content.
2. Harmful interactions with other users, including grooming or exploitation.
3. Personal online behavior that may cause harm, such as cyberbullying.
4. Risks related to online transactions, including scams and phishing.

8.3 Measures and Procedures

To reduce the risks associated with online activity and ensure a digitally safe learning environment, Evolve Academy has implemented a comprehensive set of online safety measures in line with **KCSIE 2025** guidance and our whole-school safeguarding responsibilities.

Our procedures include:

- **Curriculum Integration**
  Online safety is embedded across the curriculum to help pupils develop the skills and awareness necessary for safe and responsible internet use. Topics include privacy management, recognising online abuse and inappropriate behaviour, cyberbullying, and knowing how and when to report concerns.
- **Staff Induction and Training**
  All staff receive induction training that covers key areas of online safety, including the prevention of cyberbullying, exposure to harmful content, online radicalisation, and the legal responsibilities regarding filtering and monitoring. Staff receive **regular updates and annual refresher training** to ensure their knowledge remains current.
- **Parental Engagement**
  Evolve Academy works in partnership with parents and carers to raise awareness of online risks. We provide regular guidance and resources to help families manage online safety at home, as well as clear procedures for reporting concerns.
- **Mobile Phone and Device Use**
  Personal mobile phones must not be used by staff for taking images or recordings of pupils unless authorised for a specific safeguarding or educational purpose. Restrictions are in place to ensure appropriate use of personal devices on site, in line with DfE guidance.

- **Acceptable Use Agreements**
  All students, staff, and visitors are required to sign and adhere to Acceptable Use Agreements outlining the expectations for using digital technology and the internet responsibly within the academy.
- **Sanctions and Enforcement**
  Clear consequences are in place for breaches of the academy's policies on internet and mobile phone use. These are communicated to all stakeholders and enforced consistently.
- **Search, Screening and Confiscation**
  Staff are empowered to search a student's phone or device if there is reason to believe it contains harmful or inappropriate material, in line with the DfE's guidance on searching, screening, and confiscation.
- **Filtering and Monitoring**
  Evolve Academy uses **Impero filtering and monitoring software** across all school devices and networks. This system actively blocks access to inappropriate content and alerts safeguarding staff to concerning online behaviours or keywords. Impero enables real-time monitoring and comprehensive audit trails, supporting both proactive safeguarding and incident response.
- **Regular Review and Risk Assessment**
  Our online safety strategy is reviewed annually and is informed by a risk assessment that considers the specific digital threats faced by our school community. We adapt our approach as new risks emerge.
- **Safeguarding Updates**
  Regular updates on safeguarding—including online safety—are shared with staff throughout the academic year. This ensures continued awareness of emerging issues and reinforces their confidence to act.
- **Policy Review and Update**
  This Safeguarding and Child Protection Policy, including all online safety measures and procedures, is formally reviewed and updated annually to reflect changes in legislation, technology, and identified school risks.

8.4 References to Policies

For detailed policies on online safety and mobile phone use, please refer to our standalone documents available on our website. These policies provide comprehensive guidance on filtering and monitoring procedures, acceptable use agreements, and sanctions for breaches.

By adhering to these measures and guidelines, Evolve Academy is committed to ensuring a safe and secure online environment for all members of our school community.

Section 9: Notifying Parents or Carers

Aligned with the latest Department for Education (DfE) 2024 updates and Keeping Children Safe in Education (KCSIE) 2024 guidelines, Evolve Academy emphasizes transparent communication with parents or carers regarding safeguarding concerns. This section outlines our approach:

9.1 Discussion with Parents or Carers

When appropriate, we will engage in discussions with the parents or carers of a child involved in safeguarding concerns. The Designated Safeguarding Lead (DSL) typically leads this communication following a suspicion or disclosure. Other staff members will only initiate discussions with parents or carers after consulting with the DSL.

9.2 Risk Assessment Before Notification

If we assess that notifying the parents or carers could heighten the risk to the child, we will seek guidance from the local authority children's social care team before proceeding with the notification.

9.3 Allegations Involving Other Children

In cases where allegations of abuse involve other children, we will generally inform the parents or carers of all children involved. Careful consideration will be given to the information shared about the other child and the timing of disclosure. We will coordinate with the police and/or local authority children's social care to ensure consistency in our approach to information sharing.

9.4 Meetings with Parents or Carers

The DSL, in collaboration with relevant agencies on a case-by-case basis, will:

Meet with the Victim's Parents or Carers:

Discuss safeguarding measures in place, understand their needs for support, and address their preferences regarding the progression of the report.

Meet with the Alleged Perpetrator's Parents or Carers:

Provide support, discuss interventions impacting them (e.g., changes in class placement), and clarify the rationale behind any decisions made.

This proactive engagement with parents or carers underscores our commitment to safeguarding and ensures a collaborative approach in addressing concerns and implementing protective measures.

10. Pupils with special educational needs, disabilities or health issues

We recognize that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognizing abuse and neglect in this group, including:

› Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

› Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

› The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

› Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This includes:

Counselling ,speech and language therapy ,DASH Mary dolly and Fulham fc

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

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11. 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

12. Looked-after and previously looked-after children

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

› Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

› The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Zina Bourreza, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

› Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

› Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

13. Complaints and concerns about 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

Refer to PLT Complaints policy

13.3 Whistle-blowing

Refer to PLT Whistle-blowing policy

14. Record-keeping

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

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.

Records will include:

› A clear and comprehensive summary of the concern

› Details of how the concern was followed up and resolved

› A note of any action taken, decisions reached and the outcome

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

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

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

If a child 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 as soon as possible, securely, and separately from the main pupil file.

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

› **5 days** for an in-year transfer, or within

› **The first 5 days** of the start of a new term

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

All records at Evolve Academy are kept both paper based and Electronically

Paper based records are kept in the HR room in a locked cupboard

Electronic reports are kept in shared drive which have restricted access to the DST

All file are transferred by egress or SIMS file transfers for Safeguarding issue

In addition:

> Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment 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, to ensure they understand the academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

> Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning

> Be in line with advice from the 3 safeguarding partners

> Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

> Have regard to the Teachers' Standards to support the expectation that all teachers:

   o Manage behaviour effectively to ensure a good and safe environment

   o Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalization 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, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

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

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and [deputy/deputies]

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

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

They will also undertake Prevent awareness training.

15.3 Academy Council Members

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

> Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

> Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

If the chair of the Academy Council was ever required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they would receive training in managing allegations for this purpose.

15.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment 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 Mark Browne. At every review, it will be approved by the Academy Council.

17. Links with other policies

This policy links to the following policies and procedures:

> Behaviour

> Staff Code of Conduct

> Complaints

> Health and safety

> Attendance

> Online safety

> Mobile phone use

> Equality

> Relationships and sex education

> First aid

> Curriculum policies

> Designated teacher for looked-after and previously looked-after children

› Privacy notices

› Whistle blowing

› IT acceptable use

› Anti-bullying

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

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 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 cyber-bullying), 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.

Educational Neglect

Educational neglect is the persistent failure of a parent or carer to ensure a child receives an education that is suitable to their age, ability, aptitude, and special educational needs, whether at school or otherwise. This includes, but is not limited to:

- Failing to secure regular school attendance without reasonable justification.

- Withholding necessary support or resources that enable the child to access learning.

- Ignoring a child's identified educational needs, including failure to engage with support services, professionals, or plans in place.

- Allowing a child to experience significant and ongoing disruption to their learning, which is likely to impair their development or life chances.

Educational neglect should be recognised as a safeguarding concern when a parent or carer's actions, or lack of action, place a child at risk of harm through impaired educational and social development.

As a Rights Respecting School, we are guided by the United Nations Convention on the Rights of the Child (CRC). Article 28 establishes that every child has the fundamental right to an education. Failure by parents or carers to ensure their child's regular attendance at school may therefore constitute a safeguarding concern, as it represents a potential breach of this right. Where there is persistent non-engagement or a lack of support for attendance, the Academy may consider this to be educational neglect and will respond in line with statutory safeguarding procedures, including making referrals to the local authority where appropriate.

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

Safer recruitment policy

Recruitment and selection process

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

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

Advertising

When advertising roles, we will make clear:

› Our academy's commitment to safeguarding and promoting the welfare of children

› That safeguarding checks will be undertaken

› The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

› Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

› Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

› Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

› Consider any inconsistencies and look for gaps in employment and reasons given for them

› Explore all potential concerns

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

› Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

    o If they have a criminal history

    o Whether they are included on the barred list

    o Whether they are prohibited from teaching

    o Information about any criminal offences committed in any country in line with the law as applicable in England and Wales

- o   Any relevant overseas information
  › Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

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

When seeking references we will:

› Not accept open references

› Liaise directly with referees and verify any information contained within references with the referees

› Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations

› Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

› Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

› Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

› Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

› Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

› Explore any potential areas of concern to determine the candidate's suitability to work with children

› Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the 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

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

› Verify their identity

- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

- Verify their mental and physical fitness to carry out their work responsibilities

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

- Verify their professional qualifications, as appropriate

- Ensure they are not subject to a prohibition order if they are employed to be a teacher

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

    o For all staff, including teaching positions: criminal records checks for overseas applicants

    o For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

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

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

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

› There are concerns about an existing member of staff's suitability to work with children; or

› An individual moves from a post that is not regulated activity to one that is; or

› There has been a break in service of 12 weeks or more

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; or

› We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

› We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

› The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside 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

Academy Council Members

All trustees and Academy Council members will have an enhanced DBS check without barred list information.

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

The chair of the board will have their DBS check countersigned by the secretary of state.

All trustees and Academy Council members will also have the following checks:

› A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]

› Identity

› Right to work in the UK

› Other checks deemed necessary if they have lived or worked outside the UK

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.

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

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

› Possibly committed a criminal offence against or related to a child, and/or

› Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or

› Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

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

A 'case manager' will lead any investigation. This will be the headteacher, or the PLT Safeguarding Lead where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organization was using the academy premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused 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 there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

› Redeployment within the academy so that the individual does not have direct contact with the child or children concerned

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

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

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

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

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

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, or to cause harm to the subject of the allegation

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

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

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

› Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

› 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)

› 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 the designated officer, police and/or children's social care services, as appropriate

› Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

› **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated 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 designated 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. We will also appoint a staff member to conduct twice weekly telephone welfare checks. Staff will also be advised to contact their trade union as necessary and to seek the support of smartclinic **www.smartclinic.com**

> 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 (only in relation to their child – no information will be shared regarding the staff member)

> 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

If the academy 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 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 academy's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

> We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

> The Academy Council will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

- › We will involve the agency fully, but the academy will take the lead in collecting the necessary information and providing it to the LADO as required
- › We will address issues such as information sharing, to ensure any previous concerns or allegations 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.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavor to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavor to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer 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 academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the academy will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the academy will consider 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 academy.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

› Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

› Shown to be deliberately invented, or malicious, the academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

› Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

› Shown to be deliberately invented, or malicious, the academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The case manager will take advice from the LADO, police and children's 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.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation

- Details of how the allegation was followed up and resolved

- Notes of any action taken, decisions reached and the outcome

- A declaration on whether the information will be referred to in any future reference

In these cases, the academy will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

› Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

› Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager 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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

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

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

› Suspicion

› Complaint

› Safeguarding concern or allegation from another member of staff

› Disclosure made by a child, parent or other adult within or outside the school

› Pre-employment vetting checks

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

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school 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 designated officer at the local authority

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

› Being overly 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

› Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

› Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

› Empowering staff to share any low-level concerns as per section 7.7 of this policy

› Empowering staff to self-refer

› Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

- › Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- › Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

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

Record keeping

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

Records will be:

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

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

References

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

- › The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- › The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Children who are absent from education

A child being absent 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 be absent or 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 Traveler 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 are absent 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 absent, 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.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

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

Indicators of CCE can include a child:

› Appearing with unexplained gifts or new possessions

› Associating with other young people involved in exploitation

› Suffering from changes in emotional wellbeing

› Misusing drugs and alcohol

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

› Regularly missing school or education

› Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to 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 child sexual 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.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

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

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

› Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

› Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

› Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

› Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

› Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

› Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

› Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

› Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

› Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

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

 Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

We have signed up to Operation Encompass. 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.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 Designated Safeguarding Team (DST) 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/carers 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.

Teachers must report any 'known' cases of FGM to the police. **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.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 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 fmu@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 our online safety policy and RSHE/PSHE curriculum

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

› Between 2 children of any age and sex

› Through a group of children sexually assaulting or sexually harassing a single child or group of children

› Online and face to face (both physically and verbally)

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

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

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

When supporting victims, staff will:

› Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them

› Regularly review decisions and actions, and update policies with lessons learnt

› Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

› Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

› Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

› Challenging inappropriate behaviours

› Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

› Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

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

Serious violence

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

› Increased absence from school

› Change in friendships or relationships with older individuals or groups

› Significant decline in performance

› Signs of self-harm or a significant change in wellbeing

› Signs of assault or unexplained injuries

› Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

› Being male

› Having been frequently absent or permanently excluded from school

› Having experienced child maltreatment

› Having been involved in offending, such as theft or robbery

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

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 badge.

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 appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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.

Non-collection of children

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

Missing pupils

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

Procedure: Once a pupil is identified as missing by any member of school staff, the Designated Safeguarding Lead will be informed. Staff will use professional judgement and risk asses the urgency of the situation to help inform the timeframe required in establishing the pupils' whereabouts before notifying the Police. Timeliness should be on a case by case basis. Designated Safeguarding Lead should, together with the class teacher, assess the child's vulnerability. School staff will try to locate the pupil and try to establish the whereabouts of them. School staff will contact home and try to contact the pupil via their mobile telephone if known.

Notifying the Police The information required by the Police to assist in locating and returning the pupil to a safe environment is as follows: · The pupils name/s; date of birth; status (for example looked after child); responsible authority; · Where and when they went missing; · Previous missing episodes and where they went; · Who, if anyone, they went missing with; 3 · What the child was wearing plus any belongings they had with them such as bags, phone etc.; include mobile number. · Description and recent photo; · Medical history, if relevant; · Time and location last seen; · Circumstances or events around going missing with relevant safeguarding information; · Details of family, friends and associates: ·

Contact details of safeguarding lead if it was after school hours.:

mbrowne@evolveacademy.org.uk

07425845689 moblie