



## Safeguarding & Child Protection Policy

**This policy is applicable to The Khalsa Academies Trust Schools**

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This Safeguarding and Child Protection Policy is written with due regard to the Department for Education statutory guidance [Keeping Children Safe In Education \(Sept 2024\)](#) and will be reviewed each time any subsequent guidance is issued by the Secretary of State, or annually, whichever is the most appropriate.

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**If there is immediate risk of harm to a child, call the Police on 999**

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## 1. INTRODUCTION & AIMS

The Khalsa Academies Trust (TKAT) schools are committed to providing Safeguarding and Child Protection in order to promote the welfare of all its pupils. The Board of Trustees and the Local Advisory Board expect all staff and volunteers to share this commitment.

All staff have a responsibility to provide a safe environment in which children can learn. School staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop, because they have daily contact with children and young people. This system is described in the statutory guidance [Working Together to Safeguard Children 2023](#).

All schools are required to have a Safeguarding and Child Protection Policy that guides the procedures and practices of staff when safeguarding children and promoting their welfare. TKAT takes very seriously its duty towards all its pupils who have been entrusted to its care and seeks to provide a school environment where all children are safe, secure, valued, respected, and listened to.

We understand the term *Safeguarding* to mean that we will take all reasonable measures to ensure that the risk of harm to children's welfare is minimised. We also understand that where we have any concerns about a child's welfare we will take all appropriate action to address those concerns by working in full partnership with other agencies.

TKAT believes that a range of other school policies are central to many aspects of the School's Safeguarding and Child Protection Policy, and this document should therefore be read in conjunction with our policies and procedures which are referenced throughout this policy.

Safeguarding and promoting the welfare of children for the purposes of this policy is defined as per [Working Together to Safeguard Children 2023](#)

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

- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework<sup>5</sup>.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this policy as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives protecting children from maltreatment preventing impairment of children's mental and physical health or development ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes

The definition child includes everyone under the age of 18.

Our procedures will be followed by all adults, including volunteers and agency staff, working with or on behalf of the School, through regular briefings and safeguarding guidelines documents.

The aims of this policy are to:

- ensure **everybody** working in our school understands their safeguarding responsibilities
- provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities
- ensure consistent good practice across the school
- define the responsibilities of school leaders, including Trustees, Local Advisory Boards (LABs), and all staff for Safeguarding and Child Protection

All staff, volunteers and trustees are expected to know and understand this Safeguarding and Child Protection Policy and their responsibility for implementing it. This will involve all staff who work directly with children reading, as a minimum, Part one and Annex A of [Keeping Children Safe in Education \(Sept 2024\)](#). Where appropriate those staff not working directly with children may be offered the choice to read either Part One **or** Annex A (a condensed version of Part one) [Keeping Children Safe In Education Part One or Annex A \(Sept 2024\)](#).

## 1.1 Implementation, Monitoring & Review of the Safeguarding & Child Protection Policy

This policy will be reviewed annually by the Board of Trustees. It will be implemented through the school's induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the Principal, the DSL, the Senior Lead Trustee for Safeguarding, the Trust Designated Safeguarding Lead and through staff performance measures.

## 1.2 Mission Statement

### TKAT Safeguarding Statement

*The Khalsa Academies Trust and it's schools are committed to safeguarding children. We believe that children and young people should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them. We expect that all staff, volunteers, outside agencies and service providers adhere to our policies and share in our commitment to safeguard all children in our care.*

The Khalsa Academies Trust Safeguarding Statement can be found on the Trust website.

In delivering our safeguarding duties, we will:

- provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child;
- identify concerns early and prevent concerns from escalating;
- establish and maintain a culture where children feel respected, secure, are encouraged to talk and are listened to when they have a worry or concern;
- establish and maintain an environment where school staff and volunteers feel well informed about Safeguarding and Child Protection and are listened to when they have concerns about the safety and wellbeing of a child;
- ensure children know that there are adults in school whom they can approach if worried and that these adults will take action to deal with what worries them;
- ensure that children who have unmet needs are supported appropriately. This could include a referral to early help services or specialist services if they are a child in need or have been / are at risk of being **abused, neglected or exploited**;
- where there is a safeguarding concern, take the child's wishes and feelings into account when determining what action to take and what services to provide and ensure that there are systems in place for children to express their views and give feedback;
- when concerned about the welfare of a child, always act in the best interests of the child;
- reassure pupils who may be victims that their concerns or issues are being taken seriously and that they will be supported and kept safe. A pupil will never be given the impression that they are creating a problem by reporting abuse,

sexual violence or sexual harassment. Nor will they ever be made to feel ashamed for making a report;

- work with parents to build an understanding of the school's responsibilities for the welfare of all children, including the need for referrals to other agencies in some situations;
- include opportunities across the curriculum, including within Personal, Social, Health Economic (PSHE) and Information Technology (IT), for children to be taught about safeguarding and to develop the skills they need to recognise danger, protect themselves from risks and stay safe from abuse; maintain an attitude of "it could happen here" where safeguarding is concerned
- ensure that staff feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and are familiar with the appropriate whistleblowing procedures
- maintain a culture of continuous improvement with regard to Safeguarding and Child Protection arrangements.
- ensure all staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or that they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

## 2. LEGISLATION & STATUTORY GUIDANCE

The Local Authority (LA) Children's Safeguarding Boards recognise the overriding priority of ensuring that schools and settings have effective policy and procedures in place to support Safeguarding and Child Protection. The policy and procedures must reflect the needs of children and young people and the context of the individual school.

This policy is reviewed, revised and adapted each academic year, and must also be underpinned by relevant legislation and statutory guidance. For schools, the statutory guidance is [Keeping Children Safe in Education \(Sept 2024\)](#) and [Working Together to Safeguard Children](#) (WTTSC 2023) the [Governance Handbook](#) and [Competency Framework](#), DFE 2017.

This policy is based on the statutory guidance [Keeping Children Safe in Education \(Sept 2024\)](#), departmental advice; [What to do if you are Worried a Child is Being Abused - Advice for Practitioners](#); the procedures set out by the LA Children's Safeguarding Boards and the following:

The Children and Social Work Act 2017;

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of students

- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [Prevent Duty Guidance: England and Wales \(2023\)](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Statutory Guidance from the Teaching Regulation Agency
- Guidance for safer working practice for those working with children and young people in education settings (GSWP) (Safer Recruitment Consortium May 2019)
- [Children Missing Education](#) – Statutory guidance for local authorities (DfE September 2016)

We know that we cannot be complacent in respect of our collective responsibility to safeguard children and young people. We also know that risks to children and young people are never static.

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

### 3. DEFINITIONS & ABBREVIATIONS

**All staff** refers to all paid adults, volunteers or students on placement, working in any capacity in the school or in activities organised by the school which brings them in to contact with students of the school.

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

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



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

**Child** is any student under the age of 18.

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

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

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

**Upskirting** taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. See 9.16

DSL is the Designated Safeguarding Lead

KCSIE is Keeping Children Safe in Education 2024

LADO is Local Authority Designated Officer

PSHE is Personal, Social, Health Education

SENDSCO is Special Education Needs and Disabilities Coordinator

RSHE is Relationships and Sex Education and Health Education

## 4. EQUALITY STATEMENT

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

We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

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

## 5. ROLES & RESPONSIBILITIES

Safeguarding and Child Protection is everyone's responsibility. This policy applies to all staff (including those not directly employed by the school), volunteers and governors in the school. Our policy and procedures also apply to extended school and off-site activities.

### 5.1 Designated Safeguarding Lead (DSL)

The Board of Trustees ensures that an appropriate senior member of staff from the school leadership team is appointed to the role of DSL. The DSL takes lead responsibility for Safeguarding and Child Protection including online safety and understanding the filtering and monitoring systems and processes in place. This is made explicit in the role holder's job description. This person has the appropriate status and authority within the school to carry out the duties of the post. They are given the time, funding, training, resources and support to provide advice to other staff on child welfare and Child Protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

The DSL, and their deputies, are most likely to have the complete safeguarding picture and be the most appropriate people to advise on safeguarding concerns.

All Deputy DSLs are trained to the same standard as the DSL and the role is made explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for Child Protection remains with the DSL.

The DSL, Mental Health First Aider and/or Mental Health Champions will have a clear oversight of mental health issues for students and will be able to take into consideration any contextual safeguarding factors that may pose a threat to the mental health of students. The DSL will work with external partners to ensure children are escalated as appropriate and continue to access the support they need.

- **The DSL for Child Protection at each school will be named in the school policy**
- **The Deputy DSLs for Child Protection at each school will be named in the school policy**
- **Mental Health First Aider at each school will be named in the school policy**
- **Health Champions at each school will be named in the school policy**

[\(See Appendix 6: Designated Safeguarding Lead Job Description & Person Specification for more information\)](#)

#### 5.1.2 Manage Referrals

The DSL is expected to:

- refer cases of suspected abuse to the LA Children's Safeguarding Board;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- inform the police (where a crime may have been committed);
- inform the Disclosure and Barring Service where a person is dismissed or left due to risk/harm to a child.

The DSL is trained to understand the requirements of the Prevent duty and to provide advice to staff on protecting children from the risk of radicalisation. The DSL must also understand the mandatory reporting duty for FGM.

The DSL will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

### 5.1.3 Working with Others

The DSL is expected to:

- act as a point of contact with the three safeguarding partners and work with other agencies in line with [Working together to safeguard children \(2023\)](#);
- Refer to NPCC – When to call the Police to help understand when to consider calling the police and what to expect;
- liaise with the Principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#);
- as required, liaise with the "case manager" and the local authority designated officer (LADO) for Child Protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, the school nurses, the IT technicians and SENDCO on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- act as a source of support, advice and expertise to all staff;
- support staff who make referrals to the Channel programme, to the police or to Children's Social Care;
- liaise with the local authority and work with other agencies in line with [Working Together to Safeguard Children \(2023\)](#). This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to Child Protection plans;
- where necessary, and in liaison with the Principal, uses local escalation policies where the actions of other agencies have not been sufficiently timely;

- share information with appropriate staff in relation to a child's looked after (CLA) status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility;
  - ensure s/he has details of the child's care arrangements and the levels of authority delegated to the carer by the authority looking after her/him. The DSL should have details of the child's social worker and the name of the Virtual School Principal in the authority that looks after the child. The school has a Designated Teacher for children looked after. We keep a list of children looked after by the Local Authority. We monitor their progress and wellbeing carefully.
- **The LA) Virtual School Head for each school will be named in the school policy**
  - **The Designated Teacher for Children Looked After for each school will be named in the school policy**

For **children that leave the school**, the DSL should:

- ensure their Child Protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff, such as DSLs and SENDCOs, are aware as required;
- consider if it would be appropriate to share any information with the new school or college in advance of the child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

#### 5.1.4 Children who are particularly vulnerable

Some children are more vulnerable to abuse and neglect and additional barriers exist when recognising abuse for some children. This increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a schooled adult or not being aware that what they are experiencing is abuse.

To ensure that all children receive equal protection we will give special consideration to children who are;

- Disabled or have special educational needs
- Young carers
- LGBTQ+
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Asylum seekers
- Living away from
- Vulnerable to being bullied or engaged in bullying
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- Do not have English as a first language
- Looked after children

Children with SEND can also be disproportionately affected by things like bullying without outwardly showing any signs. Further information can be found in the Department's: [SEND Code of Practice 0 to 25](#) and [Supporting Pupils at School with Medical Conditions](#).

### 5.1.5 Training

The DSL (and deputies) undertake formal training, to provide them with the knowledge and the skills required to carry out the role. This training will be updated at least every two years. The DSL and deputies will also undertake Prevent awareness training.

In addition to the formal training described above, the DSL's knowledge and skills is refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, but at least annually, to allow them to understand and keep up to date with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, including the guidance provided in the LA Children's Safeguarding Board) referral arrangements;
- have a working knowledge of how the local authority conducts a Child Protection case conference and a Child Protection review conference and are able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's Child Protection policy and procedures, especially new and part-time staff;
- are alert to specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation GDPR 2016;
- understand the importance of information sharing, both within the school and with the three safeguarding partners, other agencies, organisations and practitioners;

- be able to keep detailed, accurate, secure written records of concerns and referrals;
- be able to maintain a centralised register of all concerns and referrals, including robust and chronological records of actions taken;
- be able to ensure that all concerns and referrals are regularly monitored and reviewed, that links are made to all contextual sources of information relevant to a child's safeguarding, for example their behaviour, attendance and learning and progress, and that all decisions are recorded and actioned;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and any measure the school may put in place to protect them.
  - ensure all staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or that they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

School Deputy DSLs are trained to the same standard as the lead. The Assistant Principals are also trained at Safeguarding Level 3.

### 5.1.6 Raising Awareness

The DSL should:

- ensure this safeguarding and Child Protection policy is known, understood and used appropriately;
- ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and will work with the Board of Trustees regarding this;
- ensure this Safeguarding & Child Protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;

- link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding; and
- be able to analyse concerns and referrals for patterns, trends and gaps and other safeguarding data and identify and target training for staff or groups of staff accordingly.

### 5.1.7 Availability

During term time the DSL or a Deputy should always be available (during school hours), for staff to discuss any safeguarding concerns. The DSL or a Deputy are expected to be available in person during the school day. Outside the school day availability by phone or Google Meet video conferencing, for staff to discuss any safeguarding concerns, will be acceptable.

School Senior Leaders will ensure appropriate cover arrangements for any out of hours/out of term activities.

### 5.1.8 Summary of Procedures

Following a report from a member of staff, volunteer or visitor, the DSL will consider the level of need by applying the local thresholds for referral which the LA Children's Safeguarding Board has agreed for use by all agencies and professionals who are worried or concerned about a child's safety or welfare.

Using the levels of need described in the LA Children's Safeguarding Board documentation, the DSL will decide whether the child is in immediate danger or is at risk of harm, in which case a referral must be made without delay to Children's Social Care and the police immediately:

**LA) Multi-Agency Safeguarding Hub (MASH) will be provided in the school policy. Social Care Out of Hours information will be provided in the school policy.**

Making a clear statement of the known facts, any suspicions or allegations, whether or not there has been any contact with the child's family.

The DSL or Deputy should confirm any referrals in writing via a multi-agency referral form (MARF). They will clarify with the police or Children's Social Care whether the parents should be told about the referral and when and by whom.

**The LA MARF electronic link will be provided in the school policy.**

If early help is appropriate the DSL should support the relevant member of staff in liaising with other agencies and setting up an inter-agency assessment. If early help, or other support is appropriate, the case will be kept under constant review and consideration given to a referral to Children's Social Care if the child's situation does not appear to be improving.

**The full responsibilities of the DSL are set out in Annex C of KCSIE – Role of the DSL. All DSLs and Deputies must read and comply with this.**

## 5.2 The Board of Trustees

It is the responsibility of the Board of Trustees to ensure that it complies with its duties under legislation. The Board of Trustees must also have regard to [Keeping Children Safe in Education \(2024\)](#) to ensure that the school's policies, procedures and training are effective and comply with the law at all times.

The Trust ensures that all LAB members and trustees receive appropriate safeguarding and child protection (including online) training at induction, and that this training is updated at least annually. The training provides them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place within the schools are effective and supports the delivery of a robust whole school approach to safeguarding.

The Trust ensures they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Where there is a safeguarding concern, the Trust and the school leaders ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. Systems for children to report a concern are in place, they are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Trust are aware of their obligations under the [Human Rights Act 1998](#), the [Equality Act 2010](#), including the Public Sector Equality Duty (PSED) and their local multi-agency safeguarding arrangements. The PSED can be found in the Equality Act.

### Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education.



Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at [Human Rights | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com).

### Equality Act 2010

According to the Equality Act, schools must not unlawfully discriminate against pupils or students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Under the provisions set out within the Equality Act TKAT schools will take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. For example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

### Public Sector Equality Duty (PSED)

The PSED places a general duty on schools to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. As such, at TKAT schools, whenever significant decisions are being made or policies developed, specific consideration is given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

The PSED helps schools to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. For further information please see [Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com)

### Lead Trustee for Safeguarding

Although the Board of Trustees takes collective responsibility to safeguard and promote the welfare of children and young people, there is a Lead Trustee for Safeguarding and Child Protection, who takes leadership responsibility for the school's safeguarding arrangements and champions safeguarding within the school in collaboration with the Trust DSL and school DSL.

The Lead Trustee for Safeguarding and Child Protection is: **Susan Jackson**

The Lead Trustee for Safeguarding and Child Protection meets the DSL at least termly in order to monitor that safeguarding arrangements are effective. The Board of Trustees has agreed that the Lead Trustee for Safeguarding and Child Protection, together with the DSL, will report to the Board of Trustees each term. They will be responsible for implementation and oversight of the following:

### 5.2.1 Policies

The Board of Trustees will ensure that an effective Safeguarding and Child Protection policy is in place, which describes the procedures in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

The Safeguarding and Child Protection Policy should;

- describe procedures which are in accordance with government guidance;
- refer to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners;
- be reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt;
- be available publicly either via the school website or by other means

Other policies include;

- Child on Child Abuse Policy (Including Sexual Violence & Sexual Harassment)
- Online Safety,
- Special Educational Needs and Disabilities Policy (SEND)
- Behaviour Policy,
- Anti-Bullying Policy (including cyberbullying, prejudice-based and discriminatory bullying)
- Staff Code of Conduct which should, amongst other things, include: acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media.
- Children Missing Education policy, putting in place appropriate safeguarding arrangements to respond to children who go missing from education, particularly on repeat occasions to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

To further strengthen safeguarding procedures the school will;

- provide opportunities for staff to contribute to and shape the Safeguarding & Child Protection policy and the arrangements for safeguarding.
- where reasonably possible, hold more than one emergency contact number for each student so that the school has additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.
- ensure that the information we provide to the local authority, when removing a child from the school role at standard and non - standard transition points, will be in accordance with the DfE statutory guidance [children missing education](#).

- provide to all staff on induction, the school's suite of policies and procedures relevant to Safeguarding and Child Protection, along with [Keeping Children Safe in Education Part One or Annex A \(2024\)](#)
- take a proportionate, risk-based approach to the level of information provided to temporary staff and volunteers.
- ensure, through the actions of the Principal, that the above policies and procedures are followed by all staff.

### 5.2.2 Leadership of Safeguarding

The Lead Trustee for Safeguarding will ensure an appropriate senior member of staff is appointed to the role of DSL and ensure that her/his lead responsibility for Safeguarding and Child Protection is explicit in her/his job-description. The Lead Trustee for Safeguarding and Child Protection will ensure the DSL fulfils their duty of leading on the following

- Training the Deputy DSLs to the same standard as the DSL.
- The ultimate lead responsibility for Safeguarding and Child Protection, as set out in [Keeping Children Safe in Education \(2024\)](#) remains with the DSL. This responsibility should not be delegated.
- During term time, the DSL and/or a Deputy should always be available (during school hours) for staff to discuss any safeguarding concerns.
- The DSL and Deputy should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated at least every two years.
- In addition to this formal training, their knowledge and skills will be updated (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments) at regular intervals, and at least annually, to keep up with any developments relevant to the role.

### 5.2.3 Multi-Agency Working

The Trust ensures that the school contributes to multi-agency working in line with statutory guidance [Working together to safeguard children \(2023\)](#). The Lead Trustee for Safeguarding and Child Protection will ensure

- Senior leaders and in particular the DSL are aware and understand the school's role in safeguarding partner arrangements.
- Safeguarding partners and child death review partner arrangements are in place. The school will work with the three safeguarding partners (the local authority; a clinical commissioning group; and the chief officer of police) to safeguard and promote the welfare of local children, including identifying and responding to their needs.
- The Board of Trustees understands the local criteria for action and the local protocol for assessment and ensures that these are reflected in the school's own policies and procedures.
- The Board of Trustees is prepared to supply information as requested by safeguarding partners.

- The school works with Social Care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to Child Protection plans. The school will allow access for the LA Children's Safeguarding Board and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

#### 5.2.4 Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect in promoting children's welfare, including their educational outcomes. The school has clear powers to share, hold and use information for these purposes. The Board of Trustees ensures that principles and arrangements for sharing information at TKAT schools and with safeguarding partners, other agencies and practitioners are in place.

Further guidance about the Trustees' duty and expectations with regard to information sharing is set out in this policy in section 7 (including the seven golden rules for sharing information).

The Board of Trustees has taken into account:

- [Working Together to Safeguard Children 2023](#) (Chapter 1 - which includes a myth-busting guide to information sharing);
- [Information sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young people, Parents and Carers](#); and
- [The Information Commissioner's Office \(ICO\)](#) which includes ICO GDPR FAQs and guidance from the department.

#### 5.2.5 Staff Training

- Ensuring that all staff undergo Safeguarding and Child Protection training including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction and as part of the whole school safeguarding curriculum. The training will be regularly updated. Induction and training will be in line with advice from the three local safeguarding partners.
- All staff should receive regular Safeguarding and Child Protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of 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 do not want to receive such content.

- Ensuring all staff annually or upon their induction sign to say they have read and understood [Keeping Children Safe in Education Part One or Annex A \(2024\)](#).

In addition to this policy, all staff should read;

- the school behaviour policy
- Staff Code of Conduct
- Attendance and Punctuality Policy (including CME)
- Child on Child Abuse Policy (Including Sexual Violence & Sexual Harassment)
- Whistleblowing Policy
- [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils

### 5.2.6 Opportunities to Teach Safeguarding

The Board of Trustees recognises its responsibility to ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.

- This will include covering relevant issues through Relationships Education and Relationships and Sex Education, in line with [Statutory guidance: relationships education relationships and sex education \(RSE\) and health education](#) and through Personal, Social, Health and Economic (PSHE) education.
- The RSHE curriculum is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities). This program will tackle, at an age-appropriate stage, issues such as:
  - healthy and respectful relationships
  - boundaries and consent
  - stereotyping, prejudice and equality
  - body confidence and self-esteem
  - how to recognise an abusive relationship, including coercive and controlling behaviour
  - the concepts of, and laws relating to - sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called 'honour'-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
  - what constitutes sexual harassment and sexual violence and why these are always unacceptable.
- The DfE has produced a one-stop page for teachers on GOV.UK, [Teaching about relationships sex and health](#). This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

- The Trust will do all that they reasonably can to limit children's exposure to risks from the school's IT system. As part of this process, it will ensure schools have appropriate filters and monitoring systems in place and regularly review their effectiveness, ensuring that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- Whilst it is essential that appropriate filters and monitoring systems are in place, the Board of Trustees is also concerned that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

### 5.2.7 Safer Recruitment

The Board of Trustees has the responsibility to prevent people who pose a risk of harm from working with children

- By adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. The Board of Trustees has recruitment and selection policies and procedures in place. (See the TKAT Safer Recruitment policy).
- In accordance with The School Staffing (England) Regulations 2009, the Board of Trustees will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

The Board of Trustees regards it as vital that it has created a culture of safe recruitment and, as part of that, has adopted recruitment procedures that help deter, reject or identify people who might abuse children. The Board of Trustees has taken full account of the statutory guidance.

Further information on safer recruitment procedures can be found in **11.1 Safer Recruitment**

### 5.2.8 Concerns about a staff member who may pose a risk of harm to children

- Ensuring there are procedures in place to manage concerns / allegations against staff (including supply teachers and volunteers) that might indicate they would pose a risk of harm to children. Such allegations should be referred to the LA designated officer / school by the appropriate person.
- Meeting legal duties to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

The Board of Trustees and school leaders will ensure that they have read and understand the guidance about Allegations of abuse made against teachers and other staff. This guidance explains the duties of an employer and employee in respect of all cases in which it is alleged that a teacher or member of staff (including supply teachers and volunteers) in school has:

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

Further information on managing allegations against a member of staff can be found in **11.3 Allegations of abuse made against teachers and other staff**

**The responsibilities of the Board of Trustees are set out in Part Two of Keeping Children Safe in Education (September 2024) – The management of safeguarding.**

### 5.3 The Principal

The Principal will ensure that the policies and procedures adopted by the Board of Trustees are fully implemented and that sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.

#### 5.3.1 Quality Assurance

On behalf of the Board of Trustees, the Principal will ensure that all staff read at least Part One and Annex A of [Keeping Children Safe in Education \(2024\)](#).

The Principal will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of the above guidance. This will include periodic audits of Child Protection files and records by the DSL, the Principal and external auditors.

The Principal will quality assure the effectiveness of the DSL in all aspects of their role (as defined in this policy).

The Principal and DSL will prepare the safeguarding annual report to the Board of Trustees to enable Trustees to review the effectiveness of Safeguarding and Child Protection arrangements and, in turn, to influence the annual review of the policy. This enables the Board of Trustees to monitor compliance and to identify areas for improvement.

The views of children, parents and carers and staff members will be sought on safeguarding and Child Protection arrangements through surveys, questionnaires and other means.

In order that all members of staff have the knowledge and skills required to fulfil their duties, TKAT school Senior Leaders:

- publish the names and contact details for the DSL and any Deputy DSLs;
- as part of the induction programme for all new members of staff, including newly-qualified teachers, provide Safeguarding and Child Protection training. Staff new to the school, like their established colleagues, will be expected to read and understand Part One and Annex A of [Keeping Children Safe in Education \(2024\)](#) and be familiar with our Safeguarding and Child Protection policy, the Staff Code

of Conduct, and be familiar with the safeguarding response to children who go missing from education.

This information is held by the DSL in a centralised record for the purposes of auditing and identifying future training needs.

- All TKAT schools will ensure that staff provided by other agencies have received the required Child Protection training, commensurate with their roles, before being deployed,
- All temporary staff will be provided with appropriate Safeguarding and Child Protection induction training.
- The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the school's internal safeguarding processes.
- All staff members (including temporary staff) will be made aware of the school's expectations regarding safe and professional practice via the Staff Code of Conduct and Acceptable Use Policy.
- The DSL and Principal will provide a termly report to the Board of Trustees detailing safeguarding training undertaken by all staff and will maintain up to date register of who has been trained.
- Although the school has a nominated safeguarding lead on the Board of Trustees, all members of the Board of Trustees are required to access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

#### 5.4 All Staff

TKAT school staff are particularly important as they are in a position to identify concerns early, provide help for children and prevent concerns from escalating.

All staff have a responsibility to:

- Provide a safe environment in which children can learn. The Teachers' Standards state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Be prepared to identify children who may benefit from early help.
- To understand the early help process and their role in it.
- To understand our schools safeguarding policies and systems.
- To undertake regular and appropriate training which is regularly updated.
- Be aware of the process of making referrals to Children's Social Care and statutory assessment under the Children Act 1989.
- Know what to do if a child tells them that he or she is being abused or neglected.
- Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.
- Reassure pupils who may be victims that their concerns or issues are being taken seriously and that they will be supported and kept safe. A pupil will never be given the impression that they are creating a problem by reporting abuse, sexual



violence or sexual harassment. Nor will they ever be made to feel ashamed for making a report

- ensure all staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or that they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication
- all staff should understand the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods

It is the responsibility of every member of staff to know and understand this Safeguarding and Child Protection policy and our safeguarding procedures. As part of staff induction when staff join the school, they will receive training in this policy and its procedures, about the role of the DSL and the Staff Code of Conduct. This training will be updated at least every year and whenever the Safeguarding and Child Protection policy is reviewed by the Board of Trustees. Staff will be provided with Part one and Annex A of Keeping Children Safe in Education (September 2024) and will be expected to read and understand it, and any updates. Staff will also be expected to know and understand the Child on Child Abuse Policy (Including Sexual Violence & Sexual Harassment).

All staff have a responsibility to provide a safe environment in which children can learn. In every lesson or regulated activity with children and young people staff must ensure that the children are safe physically and emotionally. All staff should minimise the opportunities for child on child abuse by challenging and reporting student conduct appropriately where this behaviour is observed. All staff are provided with training that ensures they understand what this means on a practical and day to day basis. In addition, they receive Safeguarding and Child Protection updates (for example, via email, e-bulletins, staff meetings) as required and at least annually, to underpin the relevant skills and knowledge required to safeguard children effectively.

It is the staff member's responsibility to inform the school and be pro-active if they have missed any safeguarding training or updates.

All staff should be aware and be familiar with the following policies and guidance. Where relevant all staff should ensure the implementation of the policy's procedures.

- the Safeguarding and Child Protection policy
- the Staff Code of Conduct
- the safeguarding response to Children Missing from Education
- the identity and role of the DSL.
- Teachers' professional and personal standards (qualified and un-qualified teachers)
- The 2010 Equality Act and 9 *Protected Characteristics*

- Values & Rewards Policy (Behaviour Policy)
- Whistleblowing Policy
- Child on Child Abuse Policy

All staff at TKAT schools receive Safeguarding and Child Protection training which is regularly updated.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

The indicators and signs of abuse is in [APPENDIX 1 Indicators of abuse](#).

#### 5.4.1 Advice & Support

In line with other schools, each TKAT school has a DSL who provides support to staff to carry out their safeguarding duties and who will liaise closely with other services such as Children's Social Care. The DSL (or a Deputy) should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or Deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local Children's Social Care as soon as is practically possible.

#### 5.4.2 Identifying Concerns

All staff should be aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the academy, inside and outside of home, and online so that they are able to identify cases of children who may be in need of help or protection.

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

Knowing what to look for is vital to the early identification of **abuse, neglect and exploitation**. If staff are unsure, they should always speak to the DSL or a Deputy.

Additionally, all staff should be aware of the causes and indicators of specific forms of abuse and safeguarding issues.

#### 5.4.3 What staff should do if they have concerns about a child?

If staff have any concerns about a child's welfare, they should act on them immediately, in line with the school's policy and procedures and should always seek advice from the DSL.

Options will then include:

- with the DSL, managing any support for the child through our own pastoral support processes;
- an early help assessment; or

- a referral for statutory services, for examples as the child might be in need, is in need or suffering or likely to suffer harm.

The DSL or a Deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL or Deputy is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from local Children's Social Care. In these circumstances, any action taken should be shared with the DSL or Deputy as soon as is practically possible.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Just as all staff are accountable for reporting a safeguarding or Child Protection concern, so they are responsible for ensuring that action has been taken or following up with actions as advised by the DSL or a Deputy.

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of poor practice include:

- failing to act on and refer the early signs of **abuse, neglect and exploitation**;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

All staff should be aware of the process for making referrals and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they may be expected to play in such assessments. It is everyone's responsibility to ensure that concerns are followed up. If you have reported a concern, you should expect to be informed about how your concern has been acted upon and what you might be required to do next. If you do not receive this information, you should be proactive in seeking it out.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded via CPOMS; the schools online safeguarding reporting software. You must record information regarding the concerns immediately and according to the school's agreed processes. The record must be a clear, precise, factual account of the observations. If in doubt about recording requirements, staff should discuss these with the DSL or Deputy. **For information on how to report and manage a disclosure, see [Section 6 DISCLOSURES AND CONCERNS](#).**

#### 5.4.4 Early Help

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Any staff member who has a concern about a child's welfare should follow the school's referral processes. Staff should expect to support social workers and other agencies following any referral.

All staff should be aware of the local early help process and understand their role in it. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from the academy and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

If early help is appropriate, the DSL (or a Deputy) will generally lead on liaising with other agencies and setting up inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

#### 5.4.5 Statutory Assessments

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to Children's Social Care (and if appropriate the police) is made immediately. Referrals should follow the agreed process by LA Social Services.

All staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that the school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: Contextual Safeguarding.

#### 5.4.6 Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within our guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge/lanyard to denote DBS/Non-DBS whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

TKAT schools will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

**All visitors** must sign in on arrival and collect a lanyard and a School Information Leaflet which outlines Safeguarding and Child Protection procedures in school and how to report and concerns regarding a child/young person or another adult in school. This lanyard must be worn at all times.

GREEN LANYARD – VISITORS WITH VERIFIED, CLEAR DBS

RED LANYARD – VISITORS WITHOUT A DBS - *accompanied by a member of staff at all times*

#### 5.4.7 Whistleblowing: What staff should do if they have concerns about safeguarding practices within school

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime and know that such concerns will be taken seriously by the Senior Leaders.

Appropriate whistleblowing procedures are in place for such concerns to be raised with the school senior leaders.

If a member of staff feels unable to raise an issue with the school, or feels that their genuine concerns are not being addressed, they should follow the Trust whistleblowing policy. In addition, there are other whistleblowing channels:

- General guidance can be found at: [Advice on whistleblowing](#)
- The [NSPCC whistleblowing helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding Child Protection failures internally or have concerns about the way a concern is being handled by school. Staff can call 0800 028 0285, the line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**LA) Multi-Agency Safeguarding Hub (MASH) will be provided in the school policy.  
Social Care Out of Hours information will be provided in the school policy.**

## 5.5 The Local Authority

### 5.5.1 Children in Need

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

### 5.5.2 Children suffering or likely to suffer significant harm

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

### 5.5.3 What will LA Social Services do?

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

This will include determining whether:

- the child requires immediate protection and urgent action is required;
- whether the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
- any services are required by the child and family and what type of services;
- further specialist assessments are required to help the local authority to decide what further action to take;

- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

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

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

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

#### 5.5.4 Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should 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.

If in doubt about recording requirements, staff should discuss with the DSL or a DDSL.

#### 5.6 Children potentially at greater risk of harm

Whilst all children should be protected, TKAT and its schools understands that some groups of children, are potentially at greater risk of harm than others (both online and offline). The list below, is not exhaustive, but highlights some of those groups.

##### 5.6.1 Children who need a social worker (Child in Need and Child Protection Plans)

Children may require a social worker due to safeguarding or welfare needs. Children may need this help due to **abuse, neglect and exploitation** and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The local authority will share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This is considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action the Government is taking to support this.

#### 5.6.2 Children with family members in prison Children with family members in prison

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

#### 5.6.3 Children who are Lesbian, Gay, Bi Trans (LGBT) or Gender Questioning

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

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

As such, when supporting a gender questioning child, TKAT schools will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum.

#### 5.6.4 Children who are absent from Education

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



supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

### 5.7 Ofsted Inspections

The DSL and all relevant staff will provide any required and relevant information to Ofsted inspectors to help them report whether or not arrangements for safeguarding children and learners are effective.

## 6. DISCLOSURES & CONCERNS

All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If a child discloses a safeguarding concern to a member of staff or volunteer, the member of staff or volunteer should:

Receive:

- Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.
- Accept what is being said without judgement.
- Take it seriously.

Reassure:

- Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously.
- Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.

- Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

#### React:

- Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions.
- Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions.
- Do ask open questions like "Is there anything else that you want to tell me?" (WWWWH TED, What, where, who, when, how – tell explain describe)
- Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English.
- Do not ask the child to repeat what they have told you to another member of staff.
- Explain what you have to do next and whom you have to talk to.
- Refer directly to the named DSL at the school.
- Do not discuss the case with anyone outside the Child Protection team.

#### Record on CPOMS:

- Make notes at the time and transfer these onto CPOMS in detail immediately.
- Do not destroy your original notes in case they are required by Court.
- Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang.
- Record statements and observable things, not your interpretations or assumptions – keep it factual.
- Once submitted, speak with the DSL.

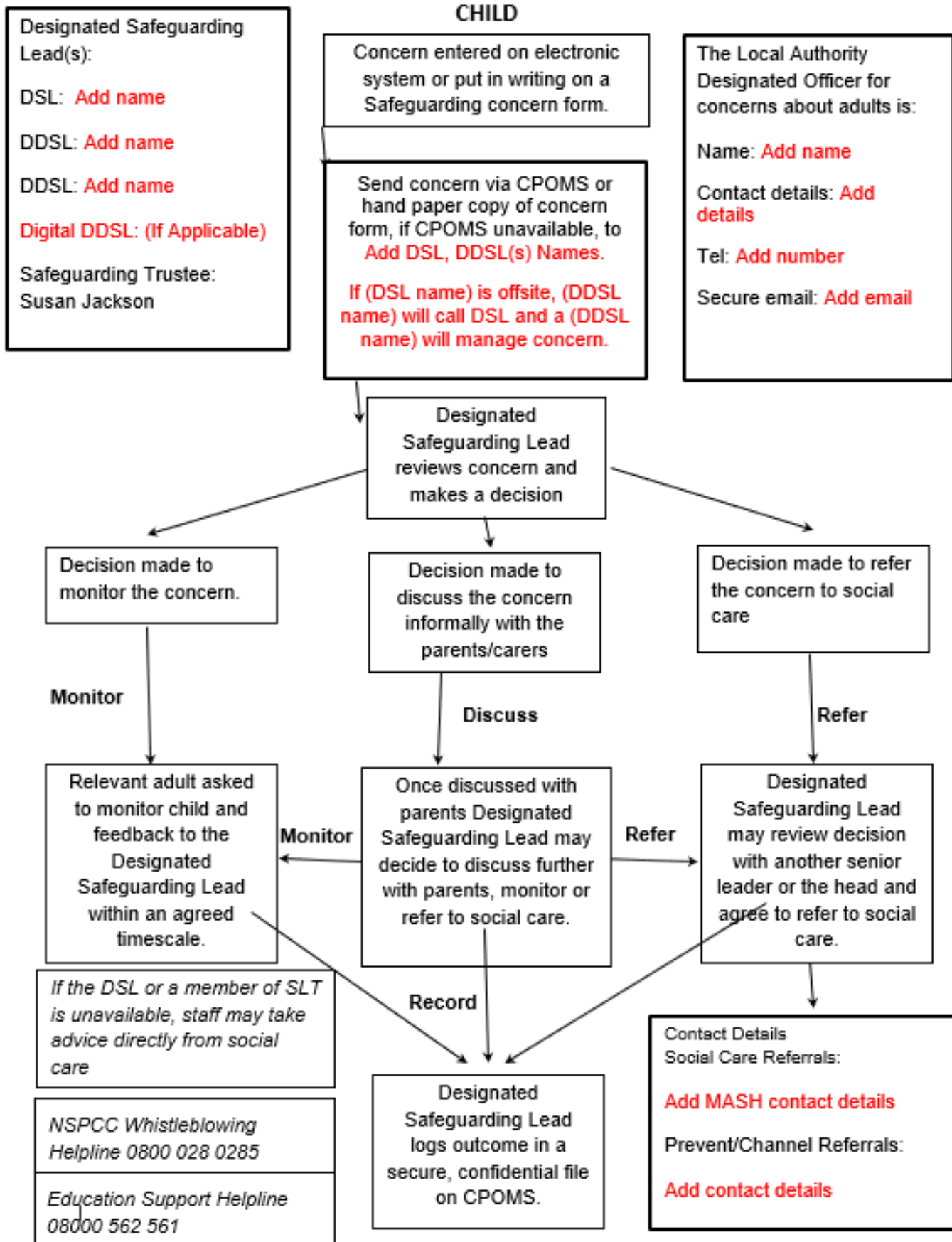
Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

Fig.1 Outlines the procedure for concerns made about a child



## EXAMPLE FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



## 7. CONFIDENTIALITY & INFORMATION SHARING

### 7.1 Information Sharing

Information sharing is vital in identifying and tackling all forms of **abuse, neglect and exploitation**. The Board of Trustees ensures that principles and arrangements for sharing information at the school and with safeguarding partners, other agencies and practitioners are in place.

The Board of Trustees has taken into account:

- [Working Together to Safeguard Children 2023](#) (Chapter 1 - which includes a myth-busting guide to information sharing);
- [Information sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young people, Parents and Carers](#); and
- [The Information Commissioner's Office \(ICO\)](#) which includes ICO GDPR FAQs and guidance from the department;
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

Information sharing is vital in identifying and tackling all forms of **abuse, neglect and exploitation**.

As part of meeting a child's needs, the Board of Trustees recognises the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the process and principles for sharing information within the school and organisations, agencies and practitioners as required.

School staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority Children's Social Care.

The Board of Trustees is aware that, among other obligations, the Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

**The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.**

The Board of Trustees will ensure that relevant staff have due regard to the data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018, and the GDPR. Relevant staff should have a clear understanding of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for

safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data.'

The Board of Trustees will ensure that staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Relevant staff should not provide pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

Where children leave the school, the DSL must ensure that their Child Protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The DSL should ensure secure transit. Confirmation of receipt should be obtained. The Child Protection file should be transferred separately from the main student file. Receiving schools and colleges should ensure key staff such as DSLs and SENDCOs or the named person with oversight for SEND in a college, are aware as required.

In addition to the Child Protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

[Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the DSL or Deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

In a case of female genital mutilation (FGM) there is a mandatory requirement for the **teacher** to report directly to the police.

### **The seven rules to sharing information**

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## 7.2 Working with parents & other agencies to protect children

Parents/carers will be made aware of our in-school procedures in respect of taking any reasonable action to safeguard the welfare of our students. In cases where the school has reason to be concerned that a child may be suffering significant harm, ill treatment or neglect or other forms of harm, staff will follow the procedures for responding to suspected cases of child abuse outlined in this policy document and contact Social Care.

In keeping with KCSIE, we will endeavour wherever possible to obtain at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at the home.

In general, we will discuss concerns with parents/carers before approaching other agencies and will seek to inform parents/carers and receive their consent when making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents/carers of a referral to another agency may increase the risk of significant harm to the child.

Parents/carers are informed about our Safeguarding & Child Protection policy through: the school prospectus, website, newsletters etc. A safeguarding & Child Protection statement is prominent in the school foyer/reception area.

### 7.3 Multi-Agency Work

We will co-operate with the LA MASH team in accordance with the requirements of the Children Act and allow access to child and child protection records for them to conduct section 17 or section 47 assessments.

In the best interests of our students, we will work with all relevant professionals and agencies as required to safeguard children and promote their welfare.

## 8. OUR ROLE IN THE PREVENTION OF ABUSE

**We will identify and provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their safety and well-being.**

### 8.1 The Curriculum

Relevant issues will be addressed through the PSHE curriculum, including self-esteem, emotional literacy, assertiveness, power, relationship and sex education (RSE), online safety, online bullying, sexting, child sexual exploitation (CSE), child criminal exploitation (CCE), youth generated images, female genital mutilation (FGM), preventing radicalisation, child on child abuse and anti-bullying. In Computing lessons we deliver a curriculum that ensures compliance with the [DfE Teaching Online Safety in Schools \(July 2019\)](#). We are compliant with the new [RSE guidelines](#) that all state-funded schools must have in place by September 2021.

Relevant issues will be addressed through other areas of the curriculum for example tutor periods and assemblies.

### 8.2 Other Areas of Work

All our policies that address issues of power and potential harm, e.g. Anti-Bullying, Equalities, Positive Handling, Behaviour, will be linked to ensure a whole school



approach. Our Safeguarding and Child Protection policy cannot be separated from the general ethos of the school.

## 9. OUR ROLE IN SUPPORTING CHILDREN

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, , **unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation** and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

We will offer appropriate support to individual children who have experienced abuse or who have abused others.

### 9.1 Mental Health

*“At TKAT schools, we aim to promote positive mental health for every member of our school community. We pursue this aim using our universal Sikh values, of Sat (Truth), Santokh (Altruism), Daya (Compassion), Dharam (Service), Himmatt (Courage), Chardi Kala (Resilience) and Pyaar (Love). In addition to promoting positive mental health, we aim to recognise and respond to mental ill health, by developing and implementing practical, relevant and effective procedures to promote a safe and stable environment for students and staff affected both directly and indirectly by ill mental health.”* **TKAT Mental Health Statement**

The Trust Board and Local Advisory Board play an important role in supporting the mental health and wellbeing of students. They ensure the school has clear systems and processes in place for identifying possible mental health problems, including routes to escalate as well as clear referral and accountability systems.

The DSL, Mental Health First Aider and/or Mental Health Champions will have a clear oversight of mental health issues for students and will be able to take into consideration any contextual safeguarding factors that may pose a threat to the mental health of students. The DSL will work with external partners to ensure children are escalated as appropriate and continue to access the support they need.

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

Although only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff are well placed to observe children day-to-day and can help identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Children who have suffered **abuse, neglect and exploitation**, or other potentially traumatic adverse childhood experiences, may encounter a lasting impact throughout childhood, adolescence and into adulthood. Staff are made aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, an immediate referral to the safeguarding team must be made.

The department has published advice and guidance [Department for Education: preventing and tackling bullying](#); [Department for Education: mental health and behaviour](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Public Health England: promoting children's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Public Health England: Rise Above](#) for links to all materials and lesson plans.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the Safeguarding and Child Protection policy, and speaking to the DSL or a DDSL.

### 9.1.1 Children requiring mental health support - Kooth

Every TKAT school has access to a range of advice and support to aid in identifying those children who may require additional support in terms of their mental health. This includes working with external agencies such as Kooth. Kooth is a web based confidential support service available to young people. Kooth provides a safe and secure means of accessing mental health and wellbeing support designed specifically for young people.

### 9.1.2 Adolescent Suicide

Young people can be put at risk of significant harm from their own behaviour. Suicidal feelings should be treated as a **child protection issue** and trigger a similar level of response to children at risk of harm from others.

School children spend the majority of their waking hours at school: teachers and school staff have the opportunity to recognise the signs that a student might be at risk of suicide and they are best placed to respond effectively:

- disclosures of suicidal feelings - often verbal, but also letters, suicide pacts or pieces of creative writing
- change in sleep patterns - sleeping more or less than usual
- change in appetite - eating more or less than usual
- sudden mood swings - in some cases a notable uplift in mood preceded a suicide attempt
- feelings of hopelessness, rejection or being a burden to others
- self-neglect - often signalled by a decline in personal hygiene and appearance
- self-harm - often through deliberate cutting, but also aggressive acts such as hitting walls
- withdrawing from family and friends and stopping engagement with support services.

**Every warning sign of suicide should be taken seriously and acted on accordingly.**

Also see: [NSPCC: Suicide Learning from Serious Case Reviews](#)

[Papyrus: Save the Class of 2018](#)

## 9.2 Care Leavers

Local authorities have on-going responsibilities to the young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal adviser who develops a pathway plan with the young person. The DSL holds the details of the local authority Personal Adviser appointed to guide and support the care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

## 9.3 Children Missing from Education

A child going missing from education is a potential indicator of **abuse, neglect and exploitation**. School staff members must follow the LA procedure **Attendance Manager details will be provided in the school policy.**

Children who are absent, abscond or go missing during the school day are vulnerable and at potential risk of **abuse, neglect and exploitation**. Staff members must follow the school's procedures for dealing with children who are absent/ go missing, particularly on repeat occasions, to help identify the risk of **abuse, neglect and exploitation** including sexual abuse or exploitation and to help prevent the risks of their going missing in future

**We will comply with our statutory duty to inform the local authority of any student who falls within the reporting notification requirements outlined in the [Children Missing in Education Policy](#).**

### 9.3.1 Elective Home Education

Although many home educated children have an overwhelmingly positive learning experience. Home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will work with the LA and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where a child has an Education, Health and Care plan the school will liaise with the local authority, who will need to review the plan, working closely with parents and carers.

## 9.4 Contextual Safeguarding

We train all staff to understand that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and deputies) should be considering whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## 9.5 Child Sexual Exploitation & Child Criminal Exploitation

We train staff to recognise that both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### 9.5.1 Child Sexual Exploitation including Grooming

Staff are trained to understand that Child Sexual Exploitation (CSE) occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or

nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. It can occur over time or be a one-off incident which may happen without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

Indicators of CSE can also be indicators of CCE, such as; children who have older boyfriends or girlfriends; and children who suffer from sexually transmitted infections or become pregnant.

Grooming is when someone builds an emotional connection with a child or young person to gain their trust for the purposes of sexual abuse, sexual exploitation, trafficking or radicalisation. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female. They could be any age. Many children and young people don't understand that they have been groomed or that what has happened is abuse.

The signs of grooming aren't always obvious and groomers will often go to great lengths not to be identified. If a child is being groomed they may:

- be very secretive, including about what they are doing online
- have older boyfriends or girlfriends
- go to unusual places to meet friends
- have new things such as clothes or mobile phones that they can't or won't explain
- have access to drugs and alcohol.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or [inappropriate sexual behaviour for their age](#).

For more information and guidance: [www.nspcc.org.uk](http://www.nspcc.org.uk) What is grooming and how to protect children

Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time gaining a child's trust. Groomers may try to gain the trust of a whole family to allow them to be left alone with a child and if they work with children they may use similar tactics with their colleagues. Groomers do this by:

- pretending to be someone they are not, for example saying they are the same age online
- offering advice or understanding
- buying gifts
- giving the child attention
- using their professional position or reputation/standing in the community
- taking them on trips, outings or holidays.

If staff have a concern about a child relating to the above, they should follow the usual school referral process. For grooming relating to radicalisation see -referrals to the Channel programme (see sections 9.16 and 9.17).

### 9.5.2 Child Criminal Exploitation including County Lines

Staff are made aware that Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to other young people.

Staff are made aware that potential indicators of CCE may include: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education.

Staff will know that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of County Lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs (primarily crack cocaine and heroin) and money from urban areas to suburban and rural areas, market and seaside towns using dedicated mobile phones or other forms of "deal line".

Exploitation is an integral part of the county lines offending model with children exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations

and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in County Lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, County Lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and

is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office and The Children's Society County Lines Toolkit For Professionals](#)

## 9.6 Trafficking of Children & Modern Day Slavery

We recognise that exploitation includes the trafficking of children and modern day slavery. Child trafficking is child abuse. It's defined as recruiting, moving, receiving and harbouring children for the purpose of exploitation. Child trafficking is a form of modern slavery. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another. Exploitation can take many forms, such as; sexual exploitation, servitude, removal of organs, cannabis cultivation; street crime, begging and bag theft; moving drugs; forced marriage ([The right to choose: government guidance on forced marriage - GOV.UK](#) (www.gov.uk) Academy staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk)) and forced labour. Further information for staff will be found here – [Modern slavery: how to identify and support victims](#). Where child exploitation or the risk of it, is suspected, frontline practitioners must notify the DSL in line with the school procedures.

## 9.7 Domestic Abuse

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Domestic abuse may encompass a wide range of behaviours and can be presented by a single incident or a pattern of incidents. Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). **Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.** All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

### 9.7.1 Operation Encompass

[Operation Encompass](#) operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

### 9.7.2 National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects



- Refuge what is domestic violence/effects of domestic violence on children
- SafeLives: young people and domestic abuse.

### 9.8 Female Genital Mutilation (FGM) mandatory reporting duty for teachers

Whilst all staff should speak to the DSL or Deputy with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

KCSIE (2024) explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’. Specific signs and indicators for FGM include

- Having difficulty walking, standing or sitting.
- Spending longer in the bathroom or toilet.
- Appearing quiet, anxious or depressed.
- Acting differently after an absence from school.
- Reluctance to go to the doctors or have routine medical examinations.

**Any teacher** who discovers that an act of FGM appears to have been carried out on a **student under 18** must immediately (in consultation with the DSL) report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff must not examine students.

### 9.9 Breast Ironing

**Breast Ironing** also known as **Breast Flattening** is a practice whereby young pubescent girls usually aged between 9 - 15 years old and from practising communities have their breasts ironed, massaged and/or pounded down through the use of hard or heated objects to delay the development of the breasts or to attempt to cause the breasts to disappear entirely.

Breast Ironing is a harmful cultural practice. There is no specific law within the UK around Breast Ironing; however, it is a form of Physical Abuse.

Professionals working with children and young people must be able to identify the signs and symptoms of girls who are at risk of or have undergone breast ironing.

**Staff must inform the Designated Safeguarding Lead immediately if there are indicators that breast ironing may have occurred.**

Also see: [National FGM Centre: Breast Flattening](#)

### 9.10 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](#) Academy staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufcdo.gov.uk](mailto:fmufcdo.gov.uk).

### 9.11 Homelessness

Staff will alert the DSL of families becoming or at risk of becoming homeless, so that the DSL can refer to housing services at the earliest opportunity. Indicators for the risk of homelessness can include debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Duties introduced under The Homelessness Reduction Act 2017 shift focus to early intervention. For further information, refer to [Homeless Reduction Act Factsheets](#).

### 9.12 Honour-Based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in

relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead (or a Deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

### 9.13 Students on Work Experience

When organising Work Experience placements, we have procedures agreed with the LA Education and Business Partnership with the support of the LA Safeguarding Children Team. In the vast majority of placements, as the employer / employees involved will not have regular unsupervised access to young people at work, there is no need for DBS checks to take place.

DBS checks, however, must be considered when students are identified by the school as vulnerable for educational, medical, behavioural or home circumstance reasons, when the placement is long-term (lasting more than 15 days), when the placements is in a particularly isolated environment with 1:1 working or if a placement includes a residential element.

Students on all placements should regularly be made aware who they should speak to if they have a concern. They are all visited regularly by a member of staff with up to date Child Protection training.

### 9.14 Looked After Children & Previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The DSL has the responsibility for ensuring that staff have the skills, knowledge and understanding to keep children that are looked after safe.

In particular, the DSL must ensure that staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previous Child Looked After potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previous Children Looked After safe. When dealing with Children Looked After and previous Children Looked After, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children who are a particularly vulnerable group.

The Board of Trustees has a responsibility to appoint a Designated Teacher and to work with local authorities to promote the educational achievement of registered

students who are looked after. On commencement of sections 4 to 6 of the Children and Social Work Act 2017, the Designated Teacher will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

The Board of Trustees has a responsibility to ensure that the Designated Teacher has appropriate training and the relevant qualifications and experience. Statutory guidance contains further information on The Role and Responsibilities of the Designated Teacher.

### Virtual School Heads

Virtual school heads manage pupil premium plus for Children that are Looked After; they receive this funding based on the latest published number of children looked after by the local authority. The Designated Teacher should work with the virtual school head to discuss how funding can be best used to support the progress of Children Looked After and meet the needs identified in the child's personal education plan. The Designated Teacher should also work with the virtual school head to promote the educational achievement of previously Children Looked After.

Further information on the roles and responsibilities of virtual school heads can be found at [Promoting the education of looked-after and previously looked-after children](#) and [promoting the education of children with a social worker](#).

### 9.15 Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of the local authority) for the care of a child under the age of 16 (18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. Staff at all TKAT schools recognise the importance of identifying children that are privately fostered so their needs can be fully assessed by the local authority. We will confirm the status of every student's care arrangements on admission (or when a student's care arrangements change) and notify the local authority of any known or suspected fostering arrangement. We will remain alert to any additional needs that children placed away from their immediate families might face.

### 9.16 Child Abduction & Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is

important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org)

### 9.17 Child on Child Abuse

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. However, we also recognise that some students will sometimes negatively affect the learning and wellbeing of others. This is generally referred to as child on child abuse and can take many forms. Staff should be aware that it can happen both inside and outside of school and online.

This can include (but is not limited to)

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- 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); see [Sharing nudes and semi-nudes advice for educational settings](#) for further guidance
- 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; and
- 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 students are found to negatively affect the learning and wellbeing of others their behaviour will be dealt with under the school's behaviour policy.

The Board of Trustees have the responsibility to ensure that our Safeguarding and Child Protection policy includes:

- procedures to minimise the risk of child on child abuse;
- information as to how allegations of child on child abuse will be recorded, investigated and dealt with;
- clear processes as to how victims, perpetrators and any other child affected by child on child abuse will be supported;
- a clear statement that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up";
- recognition of the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and, boys, perpetrators), but that all child on child abuse is unacceptable and will be taken seriously; and
- information as to the different forms child on child abuse can take, such as:
  - bullying (including cyberbullying);
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - sexual violence and sexual harassment. Part five of KCSIE 2024 sets out how schools should respond to reports of sexual violence and sexual harassment;
  - upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
  - sexting (also known as youth produced sexual imagery): the policy should include the school's approach to it. The department provides [Searching Screening and Confiscation Advice](#) for schools. The UK Council for Internet Safety (UKCIS) Education Group has published [Advice for Schools and Colleges on Responding to Sexting Incidents](#); and
- initiation/hazing type violence and rituals.

### 9.17.1 Role of Staff

It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Even if there are no reports in our school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse they should speak to their designated safeguarding lead (or deputy)

At TKAT schools all staff will be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk. [Sexual Behaviours Traffic Light Tool](#) supports professionals working with children and young people by helping them to identify and respond appropriately to sexual behaviours.

All staff must understand the importance of challenging inappropriate behaviours between peers that are actually abusive in nature. Downplaying certain behaviours

can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

**All** staff have a responsibility of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- a zero-tolerance approach to abuse of any kind
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- being aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the [Sexual Offences Act 2003](#).

*Dismissing or tolerating such behaviours risks normalising them*

At TKAT schools we specifically minimise the risk of allegations against other students by:

- Providing a developmentally appropriate syllabus which develops students understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe to those students identified as being at risk
- Providing targeted work for students identified as being a potential risk to other students

### **Allegations against other students which are safeguarding issues**

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

TKAT schools understand the gendered nature of child on child abuse (it is more likely that girls will be victims and boys will be perpetrators) but all child on child abuse is unacceptable and will be taken seriously.

If the allegation:-

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

**Examples of safeguarding issues against a student could include:**

**Physical Abuse**

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

**Emotional Abuse**

- Blackmail or extortion
- Threats and intimidation

**Sexual Abuse**

- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting

**Sexual Exploitation**

- Encouraging other children to engage in inappropriate sexual behaviour (For example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)
- Photographing or videoing other children performing indecent acts

**Neglect**

- 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.
- 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;

**Procedure:**

- When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the DSL (DSL) should be informed and a concern raised on CPOMS.
- The DSL will make a referral where appropriate
- If the allegation indicates that a potential criminal offence has taken place, the DSL will refer the case to the Multi Agency Safeguarding Hub where the police will become involved.



- Parents, of both the student being complained about and the alleged victim, should be informed and kept updated on the progress of the referral.
- The DSL will make a record of the concern, the discussion and any outcome.
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual behaviour/disciplinary procedures.

Where there is a safeguarding concern, the school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the **best** interests of the child.

### 9.18 Prevent

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

The Prevent duty should be seen as part of the school's wider safeguarding obligations. DSLs and other senior leaders are required to familiarise themselves with the [Prevent duty guidance: for England and Wales \(2023\)](#), especially paragraphs 141-210 which are specifically concerned with schools (and also cover childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The Department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

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

### 9.19 Channel

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

at: [Channel guidance](#), and a Channel awareness e-learning programme is available for staff at: [Channel General Awareness](#).

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

### 9.20 Preventing Radicalisation

Children **may be susceptible into terrorism**. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of the schools' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to **the process of a person legitimising support for, or use of, terrorist violence**.
- 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 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.
- If staff are concerned about a change in the behaviour of an individual or see something that concerns them (this could be a colleague too) they must seek advice appropriately with the DSL who must contact the Preventing Violent Extremism Team on 0800 789 321

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. The Education Safeguarding Team and the Prevent team can advise and identify local referral pathways.

For more information on how to spot signs of radicalisation can be found in [APPENDIX 2 Signs of Radicalisation](#)

### 9.21 Reasonable Force in Schools

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

person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed.' The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

Staff should refer to the guidance and advice for schools in [Statutory Use of Reasonable Force in Schools July 2013](#).

## 9.22 Special Educational Needs & Disabilities

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. The Board of Trustees recognises the importance of ensuring that this Safeguarding & Child Protection policy reflects the fact that additional barriers can exist when recognising **abuse, neglect and exploitation** in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; a
- communication barriers and difficulties in overcoming these barriers.  
and
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

To address these additional challenges, TKAT schools offer extra pastoral support for children with SEN and disabilities.

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](#)
- [Mencap](#) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- [NSPCC - Safeguarding children with special educational needs and disabilities \(SEND\)](#) and [NSPCC - Safeguarding child protection/deaf and disabled children and young people](#)

## 9.23 Sexting/Youth Produced Imagery

Sexting', also referred to as 'youth produced sexual imagery', is one of a number of 'risk-taking' behaviours associated with the use of digital technologies, social media or the internet. **It can be created by under 18s themselves and involves still photographs, video, and streaming. It can include consensual and non-consensual sharing of nude and semi-nude images and/or videos.** It is accepted that children experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated.

Staff, students and parents/carers are supported, via training, to understand the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes images of students themselves if they are under the age of 18.

Any youth produced sexual imagery disclosures will follow the normal safeguarding practices and protocols for our school. We will also use the guidelines for responding to incidents, as set out in the publication 'Sexting in Schools and Colleges' produced by the UK Council for Child Internet Safety.

If the incident meets the threshold it may be necessary to refer to the police in a timely manner; contact will be through our safer schools' officer, a PCSO (Police Community Security Officer), local neighbourhood police or by dialling 101. Such a report will result in an Outcome 21 record being generated by the police. We will always endeavour to speak to the parents/carers of the students involved prior to any report being made to the police.

In the latest advice for schools ([UKCCIS, 2016](#)), sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.

Youth produced imagery does not include the sharing of sexual photos and videos of under-18-year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

### ***What to do in an incident involving youth produce imagery comes to your attention***

- Report it to your Designated safeguarding Lead (DSL) immediately
- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL
- Do not delete the imagery or ask the young person to delete it
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL
- Do not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers
- Do not say or do anything to blame or shame any young people involved

- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL

When responding to Sexting DSL's should follow [UKCCIS guidance](#)

### 9.24 Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

We recognise that 'Upskirting' involves taking a photograph under an individual's clothing without their knowledge. We understand that it causes the victim distress and humiliation. Staff must recognise that 'Upskirting' is a criminal offence and must promptly report any such incidence to the DSL, Principal or most senior member of staff.

### 9.25 Gangs & Serious Youth Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Children and young people involved with, or on the edges of, gangs might be victims of violence or they might be pressured into doing things like stealing or carrying drugs or weapons. They might be abused, exploited or put into dangerous situations.

For lots of young people, being part of a gang makes them feel part of a family so they might not want to leave. Even if they do, leaving or attempting to leave can be a frightening idea. They might be scared about what will happen to them, their friends or their family if they leave.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools is provided in the Home Office's [Preventing youth violence and gang involvement: practical advice for schools and colleges](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

### 9.26 Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent.

Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

A useful umbrella term is "harmful sexual behaviour". The term has been widely adopted in child protection and is used in this advice. **Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two.** Harmful sexual behaviour should be considered in a child protection context.

For more information see; [Think U Know: Recognising harmful sexual behaviour by young people and Brook sexual behaviours traffic light tool](#)

### 9.27 Alternative Provision

Where an Academy places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

The cohort of pupils in Alternative Provision often have complex needs, The Board of Trustees are aware of the additional risk of harm that their pupils may be vulnerable to. Further information can be obtained via:

- [Alternative Provision DFE statutory guidance](#) and
- [Education for children with health needs who cannot attend school - GOV.UK](#) – DFE statutory guidance.

## 10. SEXUAL VIOLENCE & SEXUAL HARASSMENT BETWEEN CHILDREN IN SCHOOLS

If an incident of sexual violence or sexual harassment occurs our school will follow the guidance set out in [Part 5 of Keeping Children Safe in Education 2024](#).

Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap - they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

It is important that school staff are aware of sexual violence and the fact that children can, and sometimes do, abuse their peers in this way. When referring to sexual violence the School is referring to sexual offences under the [Sexual Offences Act 2003](#) as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

The initial response to a report from a child is important. It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. If staff are in any doubt as to what to do, they should speak to the DSL (or a Deputy).

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. The designated safeguarding lead (or a deputy) s should take a leading role and use their professional judgement, supported by other agencies, such as children's social care and the police as required.

### 10.1 Awareness

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- zero-tolerance of any abuse
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts
- maintaining an attitude of **'it could happen here'**

*Dismissing or tolerating such behaviours risks normalising them*

### 10.2 Responding to reports of sexual violence or sexual harassment

Children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe, regardless of how long it has taken them to come forward. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or



sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

If staff have a concern about a child or a child makes a report to them, should act on them immediately and speak to the designated safeguarding lead.

### 10.3 Effective Safeguarding Procedures

If possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible.

Where the report includes an online element, the key consideration is for staff not to view or forward illegal images of a child. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps.

Staff should only share the report with those people who are necessary in order to progress it.

It is important that the victim understands what the next steps will be and who the report will be passed to.

It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.

Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.

Keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;

Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.

### 10.4 Making a record of the report

Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the

child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present).

However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made; only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Staff should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation. Staff will need to inform the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

### 10.5 Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms

Risk assessments should be recorded (written or electronic) and should be kept under review

At all times, the school will be actively considering the risks posed to all our pupils and put adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) will ensure they are engaging with children's social care and specialist services as required.

Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Any such professional assessments should be used to inform the school's approach to supporting and protecting their pupils and updating their own risk assessment.

### 10.6 Actions to consider following a report of sexual violence and/or sexual harassment

Following a report of sexual violence and/or harassment we will consider:

- The wishes of the victim in terms of how they want to proceed (in an age appropriate way.) This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible

over decisions regarding how any investigation will be progressed and any support that they will be offered.

- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour.
- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school staff; and
- Other related issues and wider context e.g. contextual safeguarding.

### 10.7 Managing a Report

We will consider every report on a case-by-case basis. When to inform the alleged perpetrator will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, generally, our school will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles, this will not stop our school taking immediate action to safeguard our children, where required.

Each TKAT school will be a part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

Our school will consider four likely scenarios when managing any reports of sexual violence and/or sexual harassment.

We will either manage the report:

1. Internally
2. Consider early help
3. Refer to social care
4. Report to the police

In line with managing internally, the school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and

may prevent escalation of sexual violence. It is particularly important that the DSL (and their deputies) know what the local early help process is and how and where to access support.

Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s). Whatever the response, it should be under-pinned by the principle that there is a **zero-tolerance** approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated. **All** concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

### 10.8 Safeguarding and supporting the victim

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When ongoing support will be required, we will ask the victim if they would find it helpful to have a designated trusted adult (for example, a member of the Safeguarding Team) to talk to about their needs. The choice of any such adult should be the victims. We will respect and support this choice.

We understand that a victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While we will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

We will do everything we reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

### 10.9 Safeguarding and supporting the alleged perpetrator

The following principles are based on effective safeguarding practice and will help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

The age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

Consider the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive

practices and or materials. We will seek advice, as appropriate, from children's social care, specialist sexual violence services and the police.

Any sanctions that are considered will be in line with our behaviour policy and the DfE [Behaviour in Schools](#) guidance. If the perpetrator is to be excluded the decision must be lawful, reasonable and fair. Further information about exclusions can be found in statutory guidance for schools: [Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England](#).

It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL will take responsibility to ensure this happens as well as transferring the child protection file within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives.

#### 10.10 Unsubstantiated, unfounded, false or malicious reports

As set out in [KCSIE 2024](#), **all** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school, should consider whether any disciplinary action is appropriate against the individual who made it in line with the behaviour policy.

Additional Resources:

[Childnet: Star SEND toolkit](#) Support young people with special educational needs and disabilities [Childnet: Just a Joke?](#) (for children age 9-12)

[Childnet: Step Up, Speak Out](#) (for young people age 13 – 17)

[Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation](#)

[NSPCC: Harmful sexual behaviour framework](#)

[Contextual Safeguarding Network](#)

[Keeping Children Safe in Education September 2024: Annex B](#)

LGFL '[Undressed](#)' provides schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

## 11. PROMOTING A SAFER SCHOOL CULTURE

### 11.1 Safer Recruitment

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.

When appointing **new staff**, we will:

- Ensure at least one person conducting any interview for a post at the school will have undertaken safer recruitment training.
- Follow The Education and Training (Welfare of Children) Act 2021 extended provisions to providers of post 16 Education as required
- Verify their identity (best practice is to check the name on their birth certificate where available)
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- 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, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
- In addition, as part of the shortlisting process the academy school will carry out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. should inform shortlisted candidates. The school will inform candidates that online searches will be carried out as part of due diligence checks.

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

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

**Regulated Activity** means a person who will be:

- Responsible, on a regular basis in a school, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school 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

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

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

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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.

A separate barred list checks will only be carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks have been carried out); or,
- where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation

For **volunteers** on site, 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. Note: The DBS will not charge for checks on volunteers, however, there may be an administration charge if using an external organisation to carry out the check.
- 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

### 11.1.1 European Economic Area (EEA) regulating authority teacher sanctions or restrictions

Since the 01 January 2021 the United Kingdom is no longer a member state of the European Union. From this date the TRA Teacher Services system has not maintained a list of those teachers who have been sanctioned in EEA member states. Advice about how information about a teacher's past conduct may be obtained can be found at paragraphs 279-284 of [KCSIE 2024](#).

### 11.1.2 Individuals who have lived or worked outside the UK

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges (set out in [KCSIE 2024](#) paragraph 279). This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, the academy must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, the academy should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

These checks could include, where available:

- criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions
- obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach<sup>87</sup>. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body.

Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability.



Where this information is not available the academy should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, the academy should ensure individuals undergo the same checks. The academy should make any further checks. This is often the Department/Ministry of Education but varies across the world. Whilst the safeguarding and qualified teacher status (QTS) processes are different it is likely that this information will be obtained from the same place. The academy should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment. Further information can be found in DfE Guidance: Recruit teachers from overseas.

Not all countries provide criminal record information, and where they do, the nature and detail of the information provided varies from country to country. The academy should also be mindful that the criteria for disclosing offences in other countries often have a different threshold than those in the UK. The Home Office provides guidance on criminal records checks for overseas applicants which can be found on GOV.UK.

Some overseas qualified teachers can apply to the TRA for the award of qualified teacher status (QTS) in England. Please note that holding a teaching qualification (wherever it was obtained) does not provide suitable assurances for safeguarding purposes that an individual has not been found guilty of any wrongdoing or misconduct, and or is suitable to work with children. Further information can be found in [KCSIE 2024](#).

Each TKAT academy will ensure that the recruitment of any staff who have lived or worked outside the UK will only be confirmed upon successful completion of the above checks in addition to all other usual checks.

### 11.2 Single Central Record

Our academies keep a single central record (SCR) to demonstrate we have carried out the mandatory pre-appointment checks referred to above. It is in electronic format.

Our SCR covers:

- All staff (including supply and agency staff, and trainee teachers on salaried routes)
- All members of the proprietor body (for academies and free schools this means members and Trustees)

For each staff member we record:

- The checks that will be made

- The date these checks were made

The Trustee for Safeguarding and Child Protection meets the DSL termly in order to monitor the Single Central Record is accurate and up to date.

### 11.3 Safeguarding Concerns and Allegations made about staff, including supply teachers, volunteers and contractors

It is the duty of the Board of Trustees to ensure that there are procedures in place to handle allegations against teachers, the Principal, other staff, supply teachers, volunteers and contractors. Our procedures are based upon the guidance in Part four of KCSIE (Sep 2024).

If staff have safeguarding concerns, or an allegation is made about a member of staff (including themselves, supply teachers, volunteers and contractors) having;

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

**then this should be referred immediately to the Principal; information will be provided in the school policy.**

Where there are concerns / allegations about the Principal, this should be referred immediately to the CEO or Chair of the Trust as detailed in the Trust Whistleblowing policy.

- **Anita Notta, a.notta@tkat.org.uk**

The Principal or (where the Principal is the subject of an allegation) the Chair of the Board of Trustees, should discuss the allegation immediately with the LADO. The purpose of an initial discussion is for the designated officer(s) and the case manager to consider the nature, content and context of the allegation and agree a course of action. The designated officer may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the designated officer in order to help determine whether police involvement is necessary.

**Local Authority Designated Officer:**

## **LADO information will be provided in the school policy.**

If an allegation is determined to be unsubstantiated or malicious, the designated officer(s) should refer the matter to the Children's Social Care services to determine whether the child concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the Principal should consider whether any disciplinary action is appropriate against the student or student who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a student or student.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, staff can contact any of the professionals named in the above paragraph, in addition to other whistleblowing channels which may be open to them.

### **11.3.1 Supply Teachers**

It is possible that in some circumstances the school will have to consider an allegation against an individual not directly employed by the school, where its disciplinary procedures would not fully apply, for example, supply teachers provided by an employment agency.

Whilst the school is not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The Principal and The Trust will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst the investigation takes place.

Supply agencies are required to be fully involved and to co-operate in any enquiries from the LADO, police and/or children's social services. The school will in most circumstances take the lead because supply agencies will not have direct access to children or other school staff, so will be unable to collect the facts when an allegation is made, nor will they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under the supervision, direction and control of The Trust when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the supply agency are taken into account by the school during the investigation.

When using a supply agency, the school will inform them of our process for managing allegations. This will include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

### 11.3.2 Organisations or Individuals Using School Premises

TKAT schools may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the school will follow their safeguarding policies and procedures, including informing the LADO.

### 11.4 Allegations that may meet harms threshold

Allegations that might indicate a person would pose a risk of harm if they continue to work in their present position or in any capacity with children in a school. Examples of such concerns could include:

- 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 he or she 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.
- Low-level concerns

#### 11.4.1 Low-level concerns

The term 'low-level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the harms threshold.

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

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language
- humiliating pupils

## Sharing low-level concerns

All low-level concerns should be shared with the Principal as soon as possible. The Principal will be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL, the Principal may wish to consult with the DSL and take a more collaborative decision making approach.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If the Principal and/or DSL are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

## Low-level concern procedures

For any concerns that do not meet the harm threshold it is important that the school follows the procedures outlined below.

- All low-level concerns should be recorded in writing
- The record should include details of the concern, the context in which the concern arose, and action taken
- The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible
- All records must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies will be revised, and/or extra training delivered to minimise the risk of it happening again.

All low-level concerns information, must be retained at least until the individual leaves their employment.

**For further information see the TKAT Managing Staff Allegations Policy**

## 11.5 Training & Support

All members of staff have been provided with a copy of Part One of “Keeping Children Safe in Education” (2024) which covers Safeguarding information for all staff. School leaders will read the entire document. School leaders and all members of staff who work directly with children will access Annex A within Keeping Children Safe in Education 2024. Members of staff have signed to confirm that they have read and understood Part One and Annex A.

***This information is held by DSL in a single central record with all other safeguarding training.***

- The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the school's internal safeguarding processes.
- All staff members (including temporary staff) will receive induction and updated INSET training to ensure they are aware of a range of safeguarding issues.
- All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually.
- All staff members (including temporary staff) will be made aware of the school's expectations regarding safe and professional practice via the staff behaviour policy and Acceptable Use Policy.
- The DSL and Principal will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain up to date register of who has been trained.
- Although the school has a nominated lead for the governing body all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.
- All staff members will be made aware of systems within our school that support safeguarding and these will be explained to them as part of our staff induction. This includes: the school's Safeguarding/Child Protection policy; the school's safer working practice document and the school's whistleblowing procedures.
- Designated Safeguarding staff will attend refresher training at least every two years. The DSL will undertake Prevent Awareness Training to enable them to provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- The Principal will attend appropriate safeguarding training at least every three years.
- The Board of Trustees, in particular the Lead Trustee for Safeguarding and Child Protection will keep up to date with Government guidelines and attend specific training for their role at least every two years.

As well as KCSIE (2024) all members of staff must have read:

- Keeping Children Safe in Education (2024) [Part 1]; and school leaders and staff that work directly with children should also read Annex A
- Staff Code of Conduct

- Safeguarding and Child Protection Policy
- School's Behaviour Policy
- What to do if you're worried a child is being abused

All staff will undergo safeguarding and child protection training (including online safety) at induction. The training will be regularly updated. Induction and training will be in line with advice from the three local safeguarding partners;

In addition, all staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Ensuring all staff read at least Part one, Part five and Annex A of Keeping Children Safe in Education (2024)

### 11.6 Safe Working Practice

- All members of staff are required to work within clear guidelines on Safe Working Practice / the school's
- Code of Conduct/school expectations.
- Staff should be aware of the school's Behaviour Management and Physical Intervention Policies, and any physical interventions must be in line with agreed policy and procedures.
- Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should adhere to the school's online safety and Acceptable Use policies.
- The relationships and associations that staff have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the school.

### 11.7 Staff Supervision & Support

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.

The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children

- All staff will be supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

### 11.8 Children's & Parents' access to Child Protection files

Under Data Protection legislation (General Data Protection Regulation & Data Protection Act 2018) a student or their nominated representative have a number of legal rights in respect of information relating to them. These rights include the right to access and the right to rectification of inaccurate data. Therefore, all information will be accurately recorded, objective in nature and expressed in a professional manner.

Any child who has a Child Protection file has a right to request access to it. However, neither the child nor the parent has an automatic right to see all the information held in Child Protection records. Information can be withheld if disclosure:

- could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person; or
- could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child; or
- is likely to prejudice an on-going criminal investigation; or
- information about the child also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority.

It is best practice to make reports available to the child or their parents unless the exceptions described above apply.

The establishment's report to the Child Protection conference will (wherever possible) be shared with the child, if old enough, and parent at least two days before the conference.

### 11.9 Archiving

The school that the student attended until statutory school leaving age (or the school where the student completed sixth form studies) is responsible for retaining any Child Protection records they may hold. The recommended retention period is 35 years from closure when there has been a referral. If no referral has been made, the Child Protection record will be retained until the child's 25th birthday, after which point the file will be deleted from our electronic system. The decision of how and where to



store child protection files will be made by the school. Due to sensitivity of the information, the records will continue to be held in a secure area with limited access e.g. designated officer or Principal. The DSL is responsible for ensuring that all CP files are archived in accordance with the timescales referenced above.

### 11.10 Safe Destruction of the Student Record

Where records have been identified for destruction, they will be disposed of securely at the end of the academic year (or as soon as practical before that time). Records which have been identified for destruction will be confidentially destroyed. This is because they will either contain personal or sensitive information, which is subject to the requirements of Data Protection legislation or they will contain information which is confidential to school or the Local Education Authority. Information will be shredded (or deleted as appropriate) prior to disposal or confidential disposal can be arranged through private contractors. For audit purposes the school will maintain a list of records which have been destroyed and who authorised their destruction. This can be kept securely in either paper or an electronic format.

## 12. USE OF SCHOOL PREMISES & SECURITY

### 12.1 The Use of School Premises by Other Organisations

When services or activities are provided by the Trust and/or school, under the direct supervision or management of school staff, the usual arrangements for child protection will apply. However, where services or activities are provided separately by another body using the school premises, the Principal will seek written assurance that the organisation concerned has appropriate policies and procedures in place (including inspecting these as needed) with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. TKAT will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that TKAT schools should expect these providers to have in place.

**If this assurance is not achieved, then an application to use premises will be refused.**

### 12.2 Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge/lanyard to denote DBS/Non-DBS whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

### 13. ONLINE SAFETY

We recognise that children's use of the Internet is an important part of their education but that there are risks of harm associated with its use. We have Online Safety and Acceptable Use of Technology policies that address how we minimise those risks in school and teach children how to stay safe when using the internet in their lives out of school.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of 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 do not want to receive such content.

We also recognise that all members of staff and volunteers must always be mindful of the need to follow our policy of acceptable use of our IT equipment.

#### 13.1 Online Safety in Schools

Each TKAT school will continue to provide a safe environment, including online. This includes the use of an online filtering system.

Where students are using computers in school, appropriate supervision will be in place. Staff and students will follow our existing Behaviour Policy/Code of Conduct/IT Acceptable Use Policy.

Each TKAT school will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

#### **Responding to an online safety incident:**

- 1) Preserve the evidence

#### **Note:**

- *If the incident involves the discovery of indecent images or videos of children, the police should always be contacted immediately for advice.*

- *If the incident involves unacceptable, inappropriate or potentially illegal use of schools: computer, iPad, mobile phone or camera, make sure no one else comes into contact with the equipment. Do not shut down the equipment down, but do turn the display off. Where possible lock the equipment away.*
- *Seek technical advice.*

## 2) Consider the impact of the online safety incident

If the incident is solely against the school's Acceptable Use Policy, consider applying the consequences indicated in that policy or the overarching behaviour policy.

If the incident is of a potentially criminal nature, the police should be contacted.

If the incident involves an adult, the local authority Designated Officer(s) (LADO) must be contacted for further advice (see section on "Managing allegations against staff")

## 13.2 Children & Online Safety away from School

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding and Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Where staff are interacting with children online, they will continue to follow our existing Behaviour Policy/Code of Conduct/IT Acceptable Use Policy.

Each TKAT school will communicate with parents and carers as appropriate to reinforce the importance of children being safe online and to make them aware of the systems used to filter and monitor online use. Parents and carers are made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the academy (if anyone) their child is going to be interacting with online.

Each TKAT school will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are the requirements needed when delivering **online lessons**:

### Staff

- Live lessons to be conducted via Google Meet
- One member of staff **MUST** be present in ALL lessons, whether live or pre-recorded. (Classes may need to be grouped together to accommodate as necessary).
- No 1:1s, groups only.
- **ALL** Lessons **MUST** be recorded as soon as the staff member enters the lesson.
- **ALL** lessons must be recorded in their entirety.
- Choose a suitable venue for conducting the lesson.
- Choose a neutral background where possible.

- No personal objects, photographs to be visible.
- Make sure that it is a quiet space, with no ambient noise, and family, pets and friends are never visible during a lesson.
- Lessons to be conducted away from windows if possible.
- Ensure your standard of dress is appropriate.
- Make sure your equipment and materials are organized in advance of your lesson. Be well prepared.
- All lesson resources to be prepared and uploaded via Google Classrooms in advance of the lesson.
- Resources should be kept to a reasonable size, or the downloading may prevent the family 'getting on' with their day.
- Be strict about class times and stick to them.
- Staff should only be on screen for the minimum time required.
- Members of staff must join the lesson prior to any students.
- Members of staff must only leave the lesson after **ALL** students have exited.
- Staff must record the names of students who are present using Class Charts Attendance. (This may be asked for by a member of the Pastoral or Safeguarding teams if necessary).
- Staff to remove any student(s) not in their class and to refer their name(s) to the relevant HOY.
- All students must **Mute** their mic and **Turn Off** their camera throughout the lesson.
- Staff to ensure students comply, and to record and refer any breach to the relevant HOY as required.
- Give clear instructions.
- Maintain your presence as you would in class.
- Set appropriate boundaries and maintain the same professional standards as you would at school. Online lessons should not lead to a relaxation in staff student protocols.
- Never make inappropriate jokes or comments.
- Staff to use the live stream for written communication with students during online lessons.
- Any digital communication between staff and students should be professional in tone and content.
- Do not interrupt lessons to search for refreshments. Do not eat snacks or meals during lessons if that is going to affect the lesson quality.
- Staff must endeavour where possible to follow the school behaviour policy for any students who fail to submit work/display unacceptable online behaviour and contact the relevant Head of Year.
- HOY will call parents as soon as is possible to inform them of any breach to the school behaviour policy and any sanctions that may be imposed upon the return to normal classroom lessons.

## Students

- Students should choose a suitable venue to attend the lesson.

- Students should make sure that it is a quiet space, with no ambient noise, and family, pets and friends are not around to distract them.
- Students should make sure their equipment and materials are organized in advance of the lesson. Be well prepared.
- Students should ensure all lesson resources are downloaded via Google Classrooms in advance of the lesson.
- Students should not interrupt lessons to search for refreshments. Do not eat snacks or meals during lessons.
- Students **must Mute** their mic and **Turn Off** their camera prior to joining the lesson.
- Mics **must** remain muted and cameras turned off throughout the lesson.
- Students should **only** enter the lesson they are invited to.
- Students **must not** under any circumstances provide their login details to anyone else.
- Students **must not** invite any guests from outside the school to join the lesson.
- Students **must not** forward lesson invites to other students.
- Students **must not** attempt to use a lesson invite provided by another student.
- Students should report to parents, guardians or teachers any online activity that makes them uncomfortable or is inappropriate. (The safeguarding and/or pastoral team will deal with any online issues to ensure everyone is safe and comfortable online).
- Students should treat others with respect at all times; as if they were talking to them face to face in a classroom.
- Students should use the comments box to ask questions as appropriate during the lesson.
- Students **must not** share their or others' personal information during an online lesson.
- At **no** point should students take photos, recordings or videos of teachers or other students.
- Students are aware that any breach of the above will be contradict the school behaviour policy and will be dealt with accordingly.
- Parents will be called as soon as is possible to inform them of any breach to the school behaviour policy and any sanctions that may be imposed upon the return to normal classroom lessons.

### **Academic Mentoring/Welfare Meetings**

- Live meetings to be conducted via telephone calls or Google Meet
- Phone calls via parents' phones and in all cases make sure parents are aware and agree
- All communication is logged on CPOMS.
- Academic mentoring/welfare meetings must be 1:1 via Google Meet only, no groups.
- Only SLT, Pastoral or Safeguarding staff to conduct meetings.
- Choose a suitable venue for conducting the meeting.
- Choose a neutral background where possible.
- No personal objects, photographs to be visible.

- Make sure that it is a quiet space, with no ambient noise, and family, pets and friends are never visible during a meeting.
  - Meetings to be conducted away from windows if possible.
  - Ensure your standard of dress is appropriate.
  - The meeting should be for the minimum time required.
  - Staff must join the meeting prior to any student.
  - Staff must only leave the meeting after the student has exited.
  - **ALL** meetings must be recorded in their entirety.
  - Ask clear questions and listen intently.
  - Set appropriate boundaries and maintain the same professional standards as you would at school. Online meetings should not lead to a relaxation in staff student protocols.
  - Never make inappropriate jokes or comments.
- Any digital communication between staff and students should be professional in tone and content.
- Staff must endeavour where possible to follow the school behaviour policy for any student who displays unacceptable online behaviour and contact the relevant Head of Year.

HOY will call parents as soon as is possible to inform them of any breach to the school behaviour policy and any sanctions that may be imposed upon the return to school.

### 13.3 Reducing Online Risks

TKAT recognises that the internet is a constantly changing environment with new apps, devices, websites and material emerging at a rapid pace.

We will

- regularly review the methods used to identify, assess and minimise online risks.
- examine emerging technologies for educational benefit and undertake appropriate risk assessments before their use in school is permitted.
- ensure that appropriate filtering and monitoring is in place and take all reasonable precautions to ensure that access is appropriate.
- recognise that due to the global and connected nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via our systems or devices and as such identify clear procedures to follow if breaches or concerns arise.

All members of the community are made aware of our expectations regarding safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos which could cause harm, distress or offence. This is clearly outlined in our acceptable use policies and highlighted through a variety of education and training approaches.

### 13.4 Safer Use of Technology

#### 13.4.1 Classroom Use

TKAT schools use a wide range of technology. This includes access to:

- Computers, laptops, tablets and other digital devices
- Internet, which may include search engines and educational websites
- Google classroom
- Email
- Games consoles and other games-based technologies
- Digital cameras, web cams and video cameras

All setting owned devices will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

Members of staff will always evaluate websites, (particularly YouTube), tools and apps fully before use in the classroom or recommending for use at home.

The setting will use appropriate search tools as identified following an informed risk assessment.

- Learners are allowed to use Google search in line with the school's digital vision, Google safe search is enforced along with administrative control of Google Chrome and removal of other web browsers.

We will ensure that the use of internet-derived materials, by staff and learners complies with copyright law and acknowledge the source of information.

Supervision of internet access and technology use will be appropriate to learners 'age and ability.

- Key Stage 3, 4, 5
  - learners will use age-appropriate search engines and online tools.
  - Learners will be appropriately supervised when using technology, according to their ability and understanding.

### 13.4.2 Managing Internet Access

TKAT schools will maintain a written record of users who are granted access to our devices and systems, including Wi-Fi.

All staff, learners and visitors will read and agree an acceptable use policy before being given access to our computer system, IT resources or the internet.

### 13.4.3 Decision Making

TKAT trustees, LAB members and school leaders have ensured that our schools have age and ability appropriate filtering and monitoring in place to limit learner's exposure to online risks.

Changes to the filtering and monitoring approach will be risk assessed by staff with educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.

The leadership team will ensure that regular checks are made to ensure that the filtering and monitoring methods are effective and appropriate.

Leaders are mindful to ensure that “over blocking” does not unreasonably restrict access to educational activities and safeguarding materials.

All members of staff are aware that they cannot rely on filtering and monitoring alone to safeguard learners; effective classroom management and regular education about safe and responsible use is essential.

### 13.5 Filtering & Monitoring

TKAT schools ensure that all filtering and monitoring systems and procedures are in accordance with the Department for Education published [filtering and monitoring standards](#).

TKAT schools will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems i.e. Trust IT Manager, school DSL's, appropriate senior leaders
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet safeguarding needs

Additional guidance on filtering and monitoring can be found at: UK Safer Internet Centre: “appropriate” [filtering and monitoring](#).

#### 13.5.1 Appropriate Filtering

TKAT school's education broadband connectivity is provided through Virgin Media Business.

TKAT schools use Sonicwall filtering.

- Sonicwall filtering blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
- Sonicwall is a member of [Internet Watch Foundation\(IWF\)](#) and blocks access to illegal Child Abuse Images and Content (CAIC).
- Sonicwall integrates the ‘the police assessed list of unlawful terrorist content, produced on behalf of the Home Office’



We work with Sonicwall to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.

If learners or staff discover unsuitable sites or material, they are required to report the concern immediately to a member of staff, report the URL of the site to technical staff/services.

Filtering breaches will be reported to the DSL (or deputy) and technical staff and will be recorded and escalated as appropriate.

Parents/carers will be informed of filtering breaches involving learners as appropriate.

Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the IWF, the police and/or CEOP.

Youtube is filtered for students and therefore all reasonable steps are taken to filter out inappropriate videos.

Student mobile phones are not allowed to be used in school as per the mobile phone policy and therefore are not connected to the school Wi-Fi.

Visitor devices will be joined to the guest Wi-Fi network where appropriate and therefore not have access to sensitive data.

### 13.5.2 Appropriate Monitoring

TKAT and its schools will appropriately monitor internet use on all setting owned or provided internet enabled devices. This is achieved by:

- Physical monitoring (supervision)
- Monitoring internet and web access (reviewing logfile information)
- Active/pro-active technology monitoring services.(Impero, Senso)

All users will be informed that use of our systems can be monitored and that all monitoring will be in line with data protection, human rights and privacy legislation.

If a concern is identified via monitoring approaches we will respond in line with the safeguarding policy.

### 13.6 Cyber Security

TKAT ensures that all its schools are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Further guidance on e-security is available from the [National Education Network](#).

## 14. MONITORING & REVIEW

This policy will be reviewed annually by the DSL and the Principal, considering any legislative changes and the latest guidance issued by the DfE. Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is September 2025.

## APPENDIX 1: Indicators of Abuse

**Physical abuse** happens when a child is deliberately hurt, causing injuries such as cuts, bruises and broken bones. It can involve hitting, shaking, throwing, poisoning, burning, slapping or suffocating. It is also physical abuse when a parent or carer fabricates, or induces, the symptoms of an illness in a child.

It is normal for children to have cuts and bruises on their bodies caused by accidents which happen whilst they are moving about and/or playing. These are marks that have an acceptable and reasonable explanation. Marks or injuries which do not have an acceptable explanation may indicate that a child has been abused. This may include:

- Bruises on the cheeks, ears, palms, arms and feet; Bruises on the back, buttocks, tummy, hips and backs of legs; Multiple bruises in clusters, usually on the upper arms or out thighs; Bruising which looks like it has been caused by fingers, a hand, or an object i.e. belt, shoe etc; Large oval shaped bite marks
- Any burns which have a clear shape of an object, e.g. cigarette burn; Burns to the back of hands, feet, legs, genitals, or buttocks

Other signs of physical abuse include multiple injuries (i.e. bruising, fractures) inflicted at different times. It is particularly concerning if parents/carers are unable to explain these injuries and it is not clear whether they took the child to receive medical treatment at the time of the injury.

Be vigilant to possible abuse if a child is frequently described as ill by their parent but does not have any symptoms which are obvious to others. In addition, the parent will be unable to provide details of a medical diagnosis for the child's apparent condition.

**Emotional abuse** is persistent and, over time, it severely damages a child's emotional development. Active emotional abuse involves an adult deliberately trying to scare, humiliate or verbally abuse a child. Passive emotional abuse happens when a parent or carer denies the child the love and care they need in order to be healthy and happy. Such adults might be emotionally unavailable; fail to offer their child praise and encouragement; fail to interact with them in an age-inappropriate way; be over-protective, limiting their opportunities to explore, learn and make friends; or expect the child to meet the parent's own emotional needs.

It is important to remember that some children are naturally open and affectionate whilst others are quieter and more self-contained. Children also develop at different rates from one another and some may be slightly more or less advanced than other children in their age group. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child. The following signs may indicate emotional abuse of children:

- Inappropriate knowledge of 'adult' matters such as sex, alcohol and drugs
- Extreme emotional outbursts
- Regularly experiencing nightmares or sleep difficulties.

- Over-affectionate towards strangers or people they haven't known for very long
- Language and behaviour are not socially appropriate
- Struggles to control strong emotions
- Lacks social skills and has few if any friends
- Self-harms, e.g. scratching

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities. It does not necessarily involve violence and the child may or may not be aware of what is happening. Sexual abuse includes: grooming a child with the intention of sexually abusing them; all forms of penetrative (for example rape or oral sex) and non-penetrative sex such as masturbation, kissing, rubbing and touching outside of clothing; sexually exploiting a child in return of gifts, money or affection; and making, looking at and distributing indecent images of a child.

It may also include 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.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. (See the Child on Child Policy (Including Sexual Violence & Sexual Harassment)).

It is normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Behaviours which might be concerning depend on the child's age and the situation. Signs of sexual abuse may include

#### Middle childhood

- Masturbating in public
- Showing adult-like sexual behaviour or knowledge
- Using toys or other objects in a sexual way
- Becoming withdrawn or very clingy
- Physical signs such as anal or vaginal soreness or an unusual discharge.

#### Adolescence

- Masturbating in public
- Having sexual contact with younger children or older adults
- Pregnancy when the child does not have a boyfriend
- Sexually transmitted diseases

**Neglect** is persistently failing to meet a child's basic physical and/or psychological needs resulting in serious damage to their health and development. Neglect is difficult as it is hard to describe the absence of something such as love or attention

(Daniel et al, 2011). In practical terms, neglect may involve a parent's or carer's failure to:

- Provide adequate food, clothing and shelter
- Protect the child from physical and emotional harm or danger
- Supervise the child properly
- Make sure the child receives appropriate medical care or treatment

Neglect often happens at the same time as other types of abuse (Daniel et al, 2011; Rees et al 2011).

It is important to remember that some children are very picky eaters whilst others may refuse to wear a coat regardless of how cold it is outside. A child may also appear to be underweight, but is, in fact, naturally thin.

Some of the most obvious signs of neglect (e.g. children being thin, dirty or not wearing a coat) are not in themselves indicators of abuse. However, if, over time, it is clear that a child is not receiving an adequate level of care and supervision appropriate to their age, it may indicate that the child is being neglected. The following are general and age-specific signs of neglect. General signs of neglect for children of all age groups:

- Medical needs are not being met; not being registered with a GP; not being taken to the dentist despite having obvious dental problems; failing to ensure that the school has a child's medication, e.g. asthma inhalers
- Not taking the child to see a doctor when they are ill or have been injured.

Middle childhood

- Child has poor school attendance and punctuality and is often picked up late at the end of the day
- A child is frequently tired at school due to a lack of routine at home (e.g. regular bedtimes)
- Parents are unsupportive and uninterested in the child's education or behaviour
- A child frequently appears to be hungry and does not have a packed lunch or money to buy food

### **Adolescence**

- A child is often tired at school or due to a lack of routine at home (e.g. regular bedtimes)
- A child frequently appears to be hungry and does not have a packed lunch or money to buy food
- Parents are dismissive and non-responsive to professional concerns (e.g. the need for medical care or taking action over bullying).

## APPENDIX 2: Signs of Radicalisation

### Radicalisation Quick Reference Assessment Guide

Note: No one strand necessarily indicates someone is vulnerable to radicalisation, usually it is a combination of factors

STRAND	A Appearance	B Behaviour	C Communication	D Danger	E Environment
<b>Radicalisation</b>	Unexplained change of appearance / uniforms, flags and extremist symbols/tattoos	Avoidance of friends and family / secretive internet use (encrypted systems) / communication with extremists / secretive behaviours, hiding literature/mental health, learning vulnerabilities/not willing to mix with Out groups/ family dynamics ,breakdown, crisis / increased fitness/adventure (training) /unexplained sudden religious conversion/ non-conforming with expected British values /Participating in activities and demonstrations by extreme groups	Condemnation of others / assigning blame / in and out group speech / hate crimes / talk of revenge / aspiration to 'fight'/Grievances towards West and Authority advocating and encouraging violence to achieve extremist goals.	Intention to harm others, cause death ,physical and emotional harm / de-humanisation of others/knowledge of firearms, explosives, chemicals/previous military, fighting experience/ violent offending/ preparatory acts to travel to fight, travel to a War zone (unexplained intention to take children out of the country), increased levels of stress and anxiety (particularly Lone Actors)	Online spaces / controlling, grooming behaviours by others, / isolation from family or friends / group meeting places / private meetings/new unknown friendships

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## Appendix 3: Linked Policies

The following or similarly named policies and procedures are relevant to Safeguarding and Child Protection:

- Administration of Medicines policy
- Attendance policy
- Behaviour Policy
- Single Central record of recruitment and vetting checks
- Children Missing from Education policy and procedures
- Complaints Policy
- Data Protection policy
- Drug and Alcohol Education policy
- Early Years Foundation Stage policy (including safeguarding and welfare)
- On-line Safety policy
- Equalities Information and Objectives (public sector equality duty) statement
- First Aid policy
- Freedom of Information policy
- Health and Safety policy and risk assessments
- ICT Acceptable Use policy
- Keeping records of Child Protection and welfare concerns protocols
- Managing Staff Allegations Policy
- Offsite Activities and Educational Visits policy and risk assessments
- Pastoral Care policy
- Child on Child Policy (Including Sexual Violence & Sexual Harassment)
- Physical Education and Sports guidance
- Positive Handling and Use of Reasonable Force policy
- Premises Inspection checklist
- Prevention of Radicalisation, Extremism and Terrorism
- Personal, Social and Health Education policy
- Pupil Images policy
- Recruitment and Selection policy and procedures
- Register of pupils' attendance
- Safer Recruitment policy
- Sex (and Relationship Education) policy
- Special Educational Needs and Disabilities policy
- Spiritual, Moral, Social and Cultural Development policy
- Staff Code of Conduct - including Acceptable Use of Technologies, Staff/Pupils Relationships and Use of Social Media)
- Staff Discipline, Conduct and Grievance (procedures for addressing)
- Statement of procedures for dealing with Allegations of Abuse against Staff
- Supporting pupils with Medical Conditions
- Teachers' standards, Department for Education guidance available on GOV.UK website
- Whistleblowing procedures
- Work Experience handbook

## APPENDIX 4: LA MASH

**LA Multi-Agency Safeguarding Hub (MASH) details will be provided in the school policy.**

**Social Care Out of Hours: details will be provided in the school policy.**

All members of staff at TKAT schools are made aware of local support available:

What does the MASH do?

The MASH:

- Is a 'front door' to manage early help and safeguarding referrals
- Provides a secure and confidential environment for professionals to share information.
- Enables early identification of potential safeguarding concerns and facilitates access to timely and effective interventions.
- Prioritises referrals using Red, Amber & Green (RAG) rating.
- Makes sure that cases that don't meet the Threshold for Children's Social Care are picked up by other agencies as Early Help or other appropriate support.
- Where necessary, activates 'immediate response' social work services to provide protection for a child or young person(s).

To report any concerns about a child's safety or wellbeing telephone the LA MASH team.

Early Help and Social Care staff in the MASH will carry out a range of information checks to see what if any additional information there is in partners' files to ensure the best possible picture of the family is used to inform decisions about keeping children safe and the sort of help and support the family might need.



## APPENDIX 5: National Support

### Support for Staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### Support for Pupils

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- [UK Sikh helpline 08456440704](http://www.uk-sikh-helpline.org)
- **Children and the Court System:** [5-11-year olds](http://www.childrenandthecourtsystem.org.uk) and [12-17 year olds](http://www.childrenandthecourtsystem.org.uk).

### Support for Adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- NAPAC (National Association for People Abused in Childhood): [napac.org.uk](http://napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](http://www.councilfordisabledchildren.org.uk)

### Domestic Abuse

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- Operation Encompass <https://www.operationencompass.org/>

## Honour-Based Abuse

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/the-right-to-choose-government-guidance-on-forced-marriage)

## Sexual Abuse CSE & CCE

- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- [Home Office and The Children's Society County Lines Toolkit For Professionals](#)
- [Supporting practice in tackling child sexual abuse - CSA Centre](#)
- [Multi-agency practice principles for responding to child exploitation and extra-familial harm](#) – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

## Online Safety

- Childnet International: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- Net Aware: [www.net-aware.org.uk](http://www.net-aware.org.uk)
- ParentPort: [www.parentport.org.uk](http://www.parentport.org.uk)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- [Harmful Online Challenges and Online Hoaxes](#)

## Radicalisation & Hate

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)
- [Prevent Duty Guidance: England and Wales \(2023\)](#)

## APPENDIX 6: Designated Safeguarding Lead Job Description & Person Specification

### Job Description

**Job Title:** Designated Safeguarding Lead

**Hours:** Full Time

**Contract type:** Permanent

**Reporting to:** Principal

**Responsible for:** Safeguarding Team

### Main Purpose

The DSL will be an appropriate senior member of staff, from the school leadership team, who is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place). They will take part in strategy discussions and inter-agency meetings, and contribute to the assessment of children.

They will advise and support other members of staff on child welfare and child protection matters, and liaise with relevant agencies such as the local authority and police.

### **[Deputy DSLs (DDSL):**

Some safeguarding activities may be delegated to deputies, although the DSL will retain lead responsibility for the work of deputies and will ensure it is completed to the highest standard.

### Duties and Responsibilities

#### Managing referrals

- Refer cases of suspected abuse to the local authority children's social care
- Support staff who make referrals to local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern
- Support staff who make referrals to the Channel programme
- Refer cases to the Disclosure and Barring Service where a person is dismissed or left due to risk or harm to a child
- Refer cases where a crime may have been committed to the police
- Keep detailed, accurate, updated and secure written/electronic records of concerns and referrals, **discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.**

## Working with staff and other agencies

- Ensure staff can access and understand the school's child protection and safeguarding policy and procedures (especially new and part time staff)
- Inform the headteacher of safeguarding issues, especially ongoing enquiries (under section 47 of the Children Act 1989) into whether a child is at risk of harm, and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)
- Liaise with the case manager and the local authority's designated officer for child protection concerns in all cases where a member of school staff is involved
- Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, SENDCOs, and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) when deciding whether to make a referral by liaising with relevant agencies on matters of safety and safeguarding
- Act as a source of support, advice and expertise for staff
- Understand the assessment process for providing early help and intervention
- Develop a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference
- Attend and contribute to child protection case conferences effectively when required to do so

## Training

- Undergo training to develop and maintain the knowledge and skills required to carry out the role (DSL & DDSs)
- Undergo Prevent training and be able to:
  - Support the academy in meeting the requirements of the Prevent duty
  - Provide advice and support to staff on protecting children from the risk of radicalisation
- Undergo training on female genital mutilation (FGM) and be able to:
  - Provide advice and support to staff on protecting and identifying children at risk of FGM
  - Report known cases of FGM to the police, and help others to do so
- Refresh knowledge and skills at least annually so remain up to date with any developments relevant to the role
- Have a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:
  - understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
  - have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
  - ensure each member of staff has access to, and understands, the academy's child protection policy and procedures, especially new and part time staff;

- are alert to the specific needs of children in need, those with special educational needs and young carers;118
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the academy, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the academy with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the academy;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the academy may put in place to protect them.

In addition to the formal training set out above, knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Raise awareness**

- Ensure the academy's child protection policies are known, understood and used appropriately
- Work with the governing board to ensure the school child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly
- Ensure the safeguarding policy is available and easily accessible to everyone in the school community
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the academy in this
- Link with the local safeguarding children board (WST) to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Be alert to the specific needs of children in need, those with special educational needs and young carers

- Encourage a culture of listening to children among all staff, ensuring that children's feelings are heard where the school puts measures in place to protect them
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
  - Ensure that the school and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort;
  - Supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

#### **Other areas of responsibility**

- Where children leave the school, securely transfer their child protection file to their new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. separately from the main pupil file
- Undertake safer recruitment training and support the school to follow best practice
- Monitor the single central record and ensure it complies with all relevant legislation
- Provide safeguarding reports to the governing board
- Model best practice and uphold the principles of confidentiality and data protection at all times

The DSL will be required to safeguard and promote the welfare of children and young people, and follow school policies and the staff code of conduct.

During term time, the DSL/DDSLs should always be available during school hours for staff in the school to discuss any safeguarding concerns. Ideally this will be in person, but can also be via phone or video calling in exceptional circumstances.

Please note that this list of duties is illustrative of the general nature and level of responsibility of the role. It is not a comprehensive list of all tasks that the DSL will carry out. The postholder may be required to do other duties appropriate to the level of the role.

## Person Specification

Criteria	Qualities
<b>Qualifications &amp; Training</b>	<ul style="list-style-type: none"> <li>● GCSE (or equivalent) in English and Maths</li> <li>● Honours Degree (or equivalent)</li> <li>● Level 3 DSL training (minimum)</li> </ul>
<b>Experience</b>	<ul style="list-style-type: none"> <li>● Successful leadership or management experience in a school or other relevant organisation</li> <li>● Experience of managing safeguarding in a school or other relevant organisation, including:               <ul style="list-style-type: none"> <li>● Building relationships with children and their parents, particularly the most vulnerable</li> <li>● Working and communicating effectively with relevant agencies</li> <li>● Implementing and encouraging good safeguarding practice throughout a large team of people</li> <li>● Demonstrable evidence of developing and implementing strategies to help children and their families</li> <li>● Experience of handling large amounts of sensitive data and upholding the principles of confidentiality</li> </ul> </li> </ul>
<b>Skills &amp; Knowledge</b>	<ul style="list-style-type: none"> <li>● Expert knowledge of legislation and guidance on safeguarding and working with young people, including knowledge of the responsibilities of schools and other agencies</li> <li>● Ability to work with a range of people with the aim of ensuring the safety and welfare of children</li> <li>● Awareness of local and national agencies that provide support for children and their families</li> <li>● Excellent record keeping skills and attention to detail, in order to produce reports, take minutes of meetings, and document safeguarding concerns</li> <li>● Good IT skills, including previous use of <i>SIMs</i>, <i>Arbour</i>, <i>SENSO</i> and <i>CPOMS</i></li> <li>● Effective communication and interpersonal skills</li> <li>● Ability to communicate a vision and inspire others</li> <li>● Ability to build effective working relationships with staff and other stakeholders</li> </ul>

<b>Personal Qualities</b>	<ul style="list-style-type: none"> <li>● Commitment to ensuring the safety and welfare of children</li> <li>● Uphold and promote the ethos and values of the school</li> <li>● Act with integrity, honesty, loyalty and fairness to safeguard the assets, financial integrity and reputation of the school</li> <li>● Ability to work under pressure and prioritise effectively</li> <li>● Maintain confidentiality at all times</li> <li>● Commitment to equality</li> </ul>
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**Notes:**

This job description may be amended at any time in consultation with the postholder.

**Last review date:** September 2024

**Next review date:** September 2025

**Headteacher/Line Manager's Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Postholder's Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_