

KING'S LEADERSHIP
ACADEMY HAWTHORNES

SCHOOLS OF CHARACTER
MAKING GREAT LEADERS

SAFEGUARDING (AND CHILD PROTECTION) POLICY



GREAT SCHOOLS
TRUST

Document Control

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Kings Leadership Academy Hawthornes
Safeguarding (and Child Protection) Policy

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Key safeguarding information

Role/organisation	Name and contact details
Designated safeguarding lead (DSL)	Miss Rachel Prout r.prout@kingshawthornes.com 0151 9284543
Deputy Designated safeguarding lead (DDSL)	Mrs Elaine Spencer
Designated Prevent Lead(s)	Miss Rachel Prout
Designated Operation Encompass lead (where applicable)	Miss Rachel Prout
Chair of governors	Mr John Rigby
Lead governor for safeguarding and child protection	Squadron Leader Richard Walsh
GST lead for safeguarding	Alyson Middlemass

Key external contacts	Emails/telephone number
Police	Merseyside Police T: 101
Local authority children's social care (Sefton Integrated Front Door (IFD) – (0151 9344013/4481)	Insert local authority contact address T: 03451400845 01519343555 – out of hours E: https://forms.sefton.gov.uk/contactform/ socialcare.customeraccessteam@sefton.gov.uk
Local authority designated officer (LADO)	Tracey Holyhead Email: tracey.holyhead@sefton.gov.uk Tel number – 01519343783
Safeguarding partners	https://seftonscp.org.uk/scp
Channel/Prevent Lead/helpline	Prevent – Steve Martlew – 01519343370 Channel – Claire Wright - 07394559107
Local children's centre	Springwell Park Children's Centre 0151 2886055 Litherland Family Wellbeing Centre 0151 2886661 Netherton Family Wellbeing Centre 01512821405
Forced Marriage Unit	020 7008 0151 or fm@fco.gov.uk
Anti-terrorist hotline	counter.extremism@education.gov.uk call 999 or the confidential hotline on 0800 789 321
NSPCC helpline	0800 800 5000

Key documentation (including hyperlinks)
C&YP schools guides
Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK
Child abuse concerns: guide for practitioners - GOV.UK
Child sexual exploitation: definition and guide for practitioners - GOV.UK

Children missing education - GOV.UK
Data protection: toolkit for schools - GOV.UK
DBS Identification Checking Guidelines Disqualification under the Childcare Act 2006 - GOV.UK
Education inspection framework
Guidance for Safer Working Practice
Guidance for the Employment Of Overseas Applicants
Guidance for the Employment of Overseas Trained Teachers
HM Government Multi-agency practice guidelines: Handling cases of Forced Marriage (publishing.service.gov.uk)
Information sharing advice for safeguarding practitioners - GOV.UK
Inspecting safeguarding
Keeping children safe in education - GOV.UK
Mental health and behaviour in schools - GOV.UK
Multi-agency statutory guidance on female genital mutilation - GOV.UK
Promoting Fundamental British Values Through SMSC Protecting children from radicalisation: the prevent duty - GOV.UK
Recruit teachers from overseas - GOV.UK
Regulated activity with children in England (DBS) Relationships Education
Relationships and Sex Education and Health Education guidance (publishing.service.gov.uk)
Searching, screening and confiscation (publishing.service.gov.uk)
Sexual violence and sexual harassment between children in schools and colleges - GOV.UK
Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK
Teacher Status Checks - Employer Access Online Teaching online safety in schools - GOV.UK
The use of social media for Online Radicalisation (Home Office, 2015)
Working together to safeguard children - GOV.UK

Useful sites	
Brook Advisory Service	Virtual College: Female Genital Mutilation: Recognising and Preventing FGM
UK Safer Internet Centre	Education from the National Crime Agency
Educate Against Hate	The National Archives: Disrespect Nobody
Home Office E-Learning Training on Prevent	NSPCC

1 Aims

Great Schools Trust will provide clear guidelines around safeguarding. King's Leadership Academy, Hawthornes recognises its statutory and moral responsibility to safeguard and promote the welfare of all students. We endeavour to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- The mission, vision and values of the trust are at the forefront of all of our safe working practices with children

There are three main elements to the safeguarding (child protection policy):

- **prevention** – a commitment to early help and identification of unmet needs and vulnerabilities and partnerships with agencies to promote the welfare of students and keep children safe
- **protection** - all staff and volunteers are trained to recognise and respond to abuse and neglect and are expected to be vigilant and act quickly when they suspect a child is suffering, or is likely to suffer, harm (in line with the Safeguarding Partners procedures)
- **support** – recognition of the sensitivity and complex nature of safeguarding and child protection, ensuring that students, staff and families are supported appropriately

2 Who is responsible for this policy?

The Trust has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework or Trust framework. The Trust has delegated day-to-day responsibility for operating the policy to Great Schools Trust, the local governing body, the principal of each trust school.

The Local Academy Council (LAC) and senior leadership team (SLT) at each Trust secondary academy school has a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

3 Definitions

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 **the above** definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm (Children Act 1989).

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

Allegation is where it is alleged that a person who works with children 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 they may pose a risk of harm to children.

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

Child and children refer to children and young people under the age of 18 years. However, the principles of the document apply to professional behaviours towards all students, including those over the age of 18 years. 'Child' should therefore be read to mean any student at the education establishment.

Child in Need refers to a child that is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining a reasonable standard of health or development without the provision of services by a local authority (Children Act 1989).

Children includes everyone under the age of 18.

Early Help means providing support as soon as a problem emerges at any point in a child's life. It relates to those children and young people at risk of harm but have not yet reached the significant harm threshold and for whom a preventative service would reduce the likelihood of that risk or harm escalating. Early help requires a collaborative approach from all agencies, including schools, with the active involvement of children, young people, families, and carers. Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child.

Female Genital Mutilation (FGM) is a procedure involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse (Keeping children safe in education, DfE, 2022).

Ideology is defined as a set of beliefs (Prevent Strategy, Home Office, 2011).

Low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold, or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member towards students that is considered inappropriate in line with statutory safeguarding advice.

Mental health problems can affect many of our young people. These include depression, anxiety and conduct disorder and self-harm and often have a direct response to what is happening in their lives. Such problems also be indicators that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a concern about a child's mental health that is also a safeguarding concern, then immediate action should be taken.

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.

Non-violent extremism is extremism, as defined above, which is not accompanied by violence (Prevent duty guidance, Home Office, 2015, updated 2021). 27. Parent refers to birth parents and other adults who have legal responsibility for the child, for example stepparents, foster carers and adoptive parents or legal guardian(s).

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism (KCSIE 2022).

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

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

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

Terrorism is defined as 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 according to the Terrorism Act 2000 (TACT 2000). 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 (Prevent Duty Guidance, Home Office, 2015, updated 2021).

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

4 Roles and Responsibilities

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

4.1 GST Trustees

Trustees should:

- Facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of systems, process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law and hold the principal to account for its implementation through the local academy council
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a lead trustee for safeguarding who will be adequately trained and will meet with the link safeguarding governors on LACs to ensure that schools are meeting their legal obligations and to share good practice.

- Ensure that each LAC appoints a link governor for safeguarding and child protection in order to monitor the effectiveness of this policy through local academy councils
- Make sure that the policy is implemented alongside the procedural guidance set out by the local authority and that LAC members effectively carry out their delegated role as set out below
- Receive regular updates from LACs around the effective implementation of the safeguarding policy in each academy through LAC chairs and the trust CEO report to trustees.
- the chair of trustees will act as the 'case manager' in the event that an allegation of abuse is made against the CEO, where appropriate (see appendix 3)
- all trustees will read Keeping Children Safe in Education 2022 in its entirety and complete all required safeguarding training

4.2 Local Academy Council (LAC)

The local academy council will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of systems, process and policy development
- Read and adopt this trust policy at each review, ensuring that schools personalise it as necessary to meet the needs of their school, ensuring that it complies with the law, and holds the principal to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor on the LAC to monitor the effectiveness of this policy in conjunction with the full local academy council. This is always a different person from the DSL.
- Ensure that the link governor for safeguarding communicates with and reports back to the lead trustee for safeguarding on their school's compliance with this policy.
- Make sure:
 - the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources, and support
 - online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - the leadership team and relevant staff are aware of and understand the ICT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
 - the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers, and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll):
 - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

- make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- the chair of local academy council will act as the 'case manager' in the event that an allegation of abuse is made against the principal, where appropriate
- all governors will read Keeping Children Safe in Education in its entirety and complete all required safeguarding training
- Section 14 of this policy has information on how governors are supported to fulfil their role.

4.3 Principal

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

- Ensuring that staff (including temporary staff) and volunteers:
 - are informed of our systems which support safeguarding, including this policy, as part of their induction
 - understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
 - communicating this policy to parents/carers when their child joins the school and via the school website
 - ensuring that the DSL has a suitable job description, appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent
 - ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
 - acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
 - making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Identifying a designated teacher with responsibilities for promoting that educational achievement of looked after children (LAC) who is expected to undertake appropriate training. Their responsibilities will be set out in their job description
- Ensuring that all staff feel able to raise concerns relating to the behaviours or actions of staff members or volunteers and ensure there is a process for staff to follow to raise such concerns
- Ensuring that there is an agreed recording mechanism in place for monitoring allegations against staff
- Ensuring that student's safety and welfare is addressed through the curriculum
- Ensuring appropriate arrangements are in place to ensure staff fulfil their statutory duty to report to the police any discovery that female genital mutilation appears to have been carried out on a girl under 18
- Ensuring the school has arrangements in place to fulfil its duty to have due regard to the need to prevent people from being drawn into terrorism
- Ensuring the school has arrangements in place to monitor and respond to children who go missing from education
- Where applicable, ensure the school fulfils its responsibility to complete the section 157/175 audit in liaison with safeguarding partners
- Ensuring the school fulfils its responsibility to complete a prevent risk assessment

- Ensuring the school's single central record is regularly reviewed

Virtual school heads

- Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of students with a social worker.
- They should also identify and engage with key professionals, e.g., DSLs, SENDCos, social workers, mental health leads and others.

4.4 Designated safeguarding lead (DSL)

- The DSL is a member of the senior leadership team. Our DSL is Miss R Prout, Vice-Principal. The DSL takes lead responsibility for child protection and wider safeguarding in the school.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- If necessary, the DSL can also be contacted out of school hours if by emailing r.prout@kingshawthornes.com or safeguarding@kingshawthornes.com
- When the DSL is absent, the deputy designated safeguarding lead(s) – Mrs E Spencer, Mr P Gaul, Mr. P Giles, Mrs J Bunclark will act as cover.
- If the DSL/deputy DSLs are not available, Miss S Stronach will act as cover (for example, during out-of-hours/out-of-term activities).
- The DSL will be given the time, funding, training, resources, and support to:
 - provide advice and support to other staff on child welfare and child protection matters
 - take part in strategy discussions and inter-agency meetings and/or support other staff to do so
 - contribute to the assessment of children
 - refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
 - have a good understanding of harmful sexual behaviour

The DSL will also:

- keep the principal informed of any issues
- liaise with local authority case managers and designated officers for child protection concerns as appropriate
- ensure each member of staff has access to and understands the safeguarding and child protection policy and procedures and has read at least part one of Keeping Children Safe in Education [DfE, 2022] and signed to say that they have understood it
- ensure all staff receive induction training, regular updates on child protection issues and annual safeguarding training on child protection issues
- be alert to the specific requirements of children in need, those with special educational needs and or disability's, young carers and any other vulnerable groups
- keep detailed, accurate, secure records of concerns and referrals
- work with the trust in the annual review of the safeguarding and child protection policy and procedures
- ensure that the safeguarding and child protection policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the school in this
- where applicable, completes the local authority 157/175 audit

- complete and annual prevent risk assessment
- link with appropriate outside agencies to ensure staff received training on the prevent agenda, and the means by which to identify extremism and prevent radicalization and what to do to support them
- understand the channel panel referral system
- keep a record of staff attendance at safeguarding and child protection training
- consider whether it is appropriate to share any information with the new school or College in advance of a student leaving, in addition to the child protection file. Keeping children safe in education DfE 2022, gives the example of information that would allow the new school or college to continue supporting a victim of abuse and have the appropriate support in place for the student's arrival
- where children leave the school, ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main student file, ensuring secure transit and confirmation of receipt is obtained
- ensure school staff are aware of their statutory duty to report to the police any discovery that female genital mutilation appears to have been carried out on a girl under 18
- where applicable, ensure school has suitably trained key adults to fulfil its obligations under Operation Encompass
- where applicable ensure the school's commitment to Operation Encompass is known throughout the school community via the means of staff training parental letters posters under school website
- discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- the full responsibilities of the DSL and deputy DSL(s) are set out in their job description.

In managing referrals, the designated safeguarding lead will:

- refer all cases of suspected abuse to the local authority children's social care team
- use the NSPCC guidance for when to call the police
- liaise with the principal to inform them of issues, especially ongoing inquiries under section 47 of the children's act 1989 and police investigations
- act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies

4.5 All staff

- All staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE) 2022
- Staff who **don't** work directly with children will read part 1 of KCSIE 2022.
- All staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues), but you may expect all of your staff, including those who don't work directly with children, to read it too.

All staff will:

- Read and understand part 1 and annex B of the Department for Education’s statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g., sites they need to visit or who they’ll be interacting with online)
- Provide a safe space for students who are LGBT to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection
- Section 13 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5 Confidentiality

Safeguarding/child protection information will be dealt with in a confidential manner. It will be dealt with under the OFFICIAL-SENSITIVE category, meaning it is classed as special category data or sensitive personal data, and it should only be accessed on a “need-to-know” basis by the appropriate staff (DSLs). Other staff will be informed of relevant details only when the DSL feels their knowledge of a situation will improve their ability to deal with an individual child and/or family. A written record will be made of what information has been shared with whom and when.

Files will be kept for at least the period during which the child is attending the school, and beyond that in line with current data legislation and guidance. Please see section 13 for more information.

Access to these records by staff other than DSLs will be restricted and a written record will be kept of who has had access to them and when. Parents will be aware of information held on their child and will be kept up to date regarding any concerns or developments by the appropriate members of staff (unless this risks the safety or welfare of the child).

General communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.

School does not disclose to a parent any information held on a child if this would put the child at risk of significant harm. Should any sensitive information need to be shared (either internally or externally) to promote the welfare and/or to protect the safety of the child/ren then the data should be shared securely, with adequate protection. For example, via password protected document or recorded delivery post marked private and confidential. The trusts data protection officer should be consulted prior to any safeguarding/child protection information being shared. They can be contacted on dpo@greatschoolstrust.com.

For more information please see the trust's confidentiality policy and data protection and privacy policy.

Employees should be aware that they may have disclosed to them sensitive information in the course of their work, in or outside of the working day. In some circumstances the child may request that the information remains confidential.

Staff will need to be aware that they will be obliged to disclose information relating to child protection issues. They should make it clear to the individual, to keep them safe, confidentiality cannot be guaranteed as they will have to inform an appropriate officer (designated senior lead) and/or external agency.

Employees should use their professional judgement and discretion regarding these matters, and, if in doubt, should seek advice from the DSL.

DSLs should consider:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

You should note that:

- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

6 Recognising abuse and taking action

- Staff, volunteers, trustees and governors must follow the procedures set out below in the event of a safeguarding issue.
- Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'

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

- Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**
- Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.
- A referral should be made to Sefton Integrated Front Door at socialcare.customeraccessteam@sefton.gov.uk – 0151 9344013/4481
- If a child is in immediate danger the police should be contacted on 101/999

The person making the referral should provide the following information if available - note - absence of information must not delay a referral:

- Full name, any aliases, date of birth and gender of child/children
- Full family address and any known previous addresses
- Identity of those with Parental Responsibility
- Names, date of birth and information about all household members, including any other children in the family, and significant people who live outside the child's household
- Ethnicity, first language and religion of children and parents/carers
- Any need for an interpreter, signer, or other communication aid
- Any special needs of the child/ren
- Is the child/ren registered at a school or regularly attending a school? If so, identify the school
- Any significant/important recent or historical events/incidents in the child's or family's life
- Has the child recently spent time abroad or recently arrived in the area?
- Cause for concern including details of any allegations, their sources, timing and location
- The identity and current whereabouts of the suspected/alleged perpetrator
- The child's current location and emotional and physical condition
- Whether the child is currently safe or needs immediate protection because of any approaching deadlines (e.g. about to be collected by alleged abuser)
- The child's account and the parents' response to the concerns if known
- The referrer's relationship and knowledge of the and parents/carers
- Known current or previous involvement of other agencies/professionals
- Information regarding parental knowledge of, and agreement to the referral

The 'integrated front door' should decide within **one** working day of a referral being made about what course of action they are taking, and they should let the referrer know the outcome. The DSL will follow up on a referral should that information not be forthcoming. If, after a referral, the child's situation does not appear to be improving, the DSL will press for re-consideration using Sefton Escalation Policy and Procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. The escalation policy can be found at: -

<https://seftonscp.org.uk/p/sefton-scp-escalation-procedure#:~:text=This%20procedure%20has%20been%20developed,welfare%20of%20that%20young%20person.>

- The following link is to the GOV.UK webpage for reporting child abuse to your local council:
<https://www.gov.uk/report-child-abuse-to-local-council>

6.2 If a child makes a disclosure to you

- If a child discloses a safeguarding issue to you, you should:
 - listen to and believe them. Allow them time to talk freely and do not ask leading questions
 - stay calm and do not show that you are shocked or upset
 - tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
 - explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
 - write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
 - sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 6.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- not recognise their experiences as harmful
- feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- none of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child

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

- Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- is informed by a girl under 18 that an act of FGM has been carried out on her; or
 - observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
- must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
 - unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.
 - **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.
 - The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.
 - **Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.
 - Local procedures for students at risk of FGM are:
 - Make a referral to Sefton Integrated Front Door - socialcare.customeraccessteam@sefton.gov.uk

6.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

- Figure 1 below, illustrates the procedure to follow if you have any concerns about a child's welfare
- Where possible, speak to the DSL first to agree a course of action
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible
- Make a referral to local authority children's social care directly, if appropriate (see 'referral' below).
- Share any action taken with the DSL as soon as possible.

6.4.1 Early help assessment

- If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
- We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
- The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
- Local procedures for early help assessment are:
 - Make a referral to Sefton Integrated Front Door - socialcare.customeraccessteam@sefton.gov.uk

6.4.2 Referral

- If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so
- If you make a referral directly (see section 6.1), you must tell the DSL as soon as possible
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Local procedures for referral and escalation can be found at:

<https://seftonscp.org.uk/p/sefton-scp-escalation-procedure#:~:text=This%20procedure%20has%20been%20developed,welfare%20of%20that%20young%20person>

6.5 If you have concerns about extremism

- If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.
- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
- The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
 - think someone is in immediate danger
 - think someone may be planning to travel to join an extremist group
 - see or hear something that may be terrorist-related

6.6 If you have a mental health concern

- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 6.4.
- If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

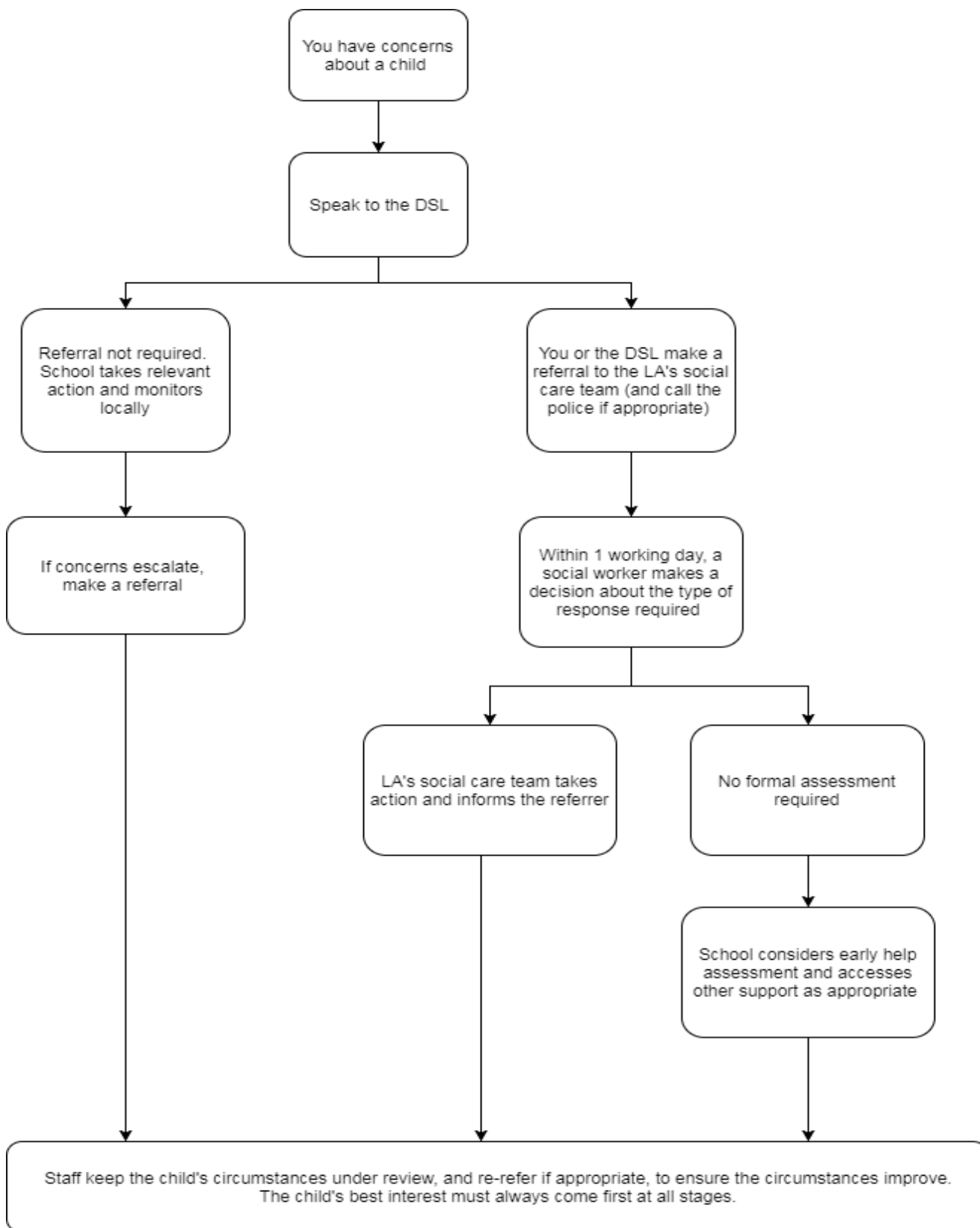
- Our procedures for identifying possible mental health problems, including routes to escalate and referral and accountability systems are outlined below:
 - CPOMS identification from staff
 - Pastoral team meetings
 - Safeguarding team meetings
 - Use of student reporting portal
 - Student health questionnaire linked to school nurse
 - All students have access to Kooth (online counselling and emotional wellbeing platform for children and young people)
 - In school pastoral 1:1 support
 - In school counsellor 1:1 support
 - Individual risk assessments produced; shared and reviewed on a termly basis.
 - Referral to The Star Centre
 - Referral to CAMHS
 - Refer to GP/A&E via parent/carer
 - Referral to Sefton Integrated Front Door

- Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

Please see overleaf for the safeguarding reporting procedure.

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

(Note – if the DSL is unavailable, this should not delay action. See section 6.4 for what to do.)



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

- If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the principal as soon as possible. If the concerns/allegations are about the principal, speak to the chair of governors.
- The principal/chair of governors will then follow the procedures set out in appendix 3, if appropriate.
- Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the principal, report it directly to the local authority designated officer (LADO).

6.8 Allegations of abuse made against other students

- We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.
- We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.
- Most cases of students hurting other students will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
 - is serious, and potentially a criminal offence
 - could put students in the school at risk
 - is violent
 - involves students being forced to use drugs or alcohol
 - involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
- See appendix 4 for more information about child-on-child abuse.

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

- If a student makes an allegation of abuse against another student:
 - you must record the allegation and tell the DSL, but do not investigate it
 - the DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
 - the DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
 - the DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary

measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

- Add further details here depending on your school's procedures for recording, investigating and dealing with allegations, and supporting victims, perpetrators and any other children affected.
 - Follow the bullying procedures
 - When relevant, ensure victim and alleged perpetrators individual needs are met within the school environment.
 - Employ a key member of staff to students.

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

- We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.
- To achieve this, we will:
 - challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
 - be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
 - ensure our curriculum helps to educate students about appropriate behaviour and consent
 - ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 6.10 below)
 - ensure staff reassure victims that they are being taken seriously
 - be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
 - support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
 - consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
 - ensure staff are trained to understand:
 - i. how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - ii. that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening –staff should maintain an attitude of “it could happen here”
 - iii. that if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - children can show signs or act in ways they hope adults will notice and react to
 - a friend may make a report
 - a member of staff may overhear a conversation
 - a child's behaviour might indicate that something is wrong

- iv. that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - v. that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - vi. the important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - vii. that they should speak to the DSL if they have any concerns
 - viii. that social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
 - Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
 - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
 - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

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

6.9.1 Your responsibilities when responding to an incident

- If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.
- You must **not**:
 - view, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
 - delete the imagery or ask the student to delete it
 - ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
 - share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
 - say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

6.9.2 Initial review meeting

- Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This may include the staff member who reported the incident and the safeguarding or leadership

team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- whether there is an immediate risk to student(s)
 - if a referral needs to be made to the police and/or children's social care
 - if it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
 - what further information is required to decide on the best response
 - whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
 - whether immediate action should be taken to delete or remove images or videos from devices or online services
 - any relevant facts about the students involved which would influence risk assessment
 - if there is a need to contact another school, college, setting or individual
 - whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
 - the incident involves an adult
 - there is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
 - what the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
 - the imagery involves sexual acts and any student in the images or videos is under 13
 - the DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
 - If none of the above apply then the DSL, in consultation with the principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

6.9.3 Further review by the DSL

- If, at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
- They will hold interviews with the students involved (if appropriate).
- If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

6.9.4 Informing parents/carers

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

6.9.5 Referring to the police

- If it is necessary to refer an incident to the police, this will be done through

- Informing the Safer Schools Officer
- If the Safer School's officer is unavailable ring 101

6.9.6 Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

6.9.7 Curriculum coverage

The below is provided as an example of how you might demonstrate the way your [is an example of how our] curriculum covers the sharing of nudes and semi-nudes. Insert details of your own approach here.

- Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education (via our Super Learning Days) and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
 - What it is
 - How it is most likely to be encountered
 - How to report worries and/or concerns
 - The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
 - Issues of legality
 - The risk of damage to people's feelings and reputation
- Students also learn the strategies and skills needed to manage:
 - specific requests or pressure to provide (or forward) such images
 - the receipt of such images
- This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident.

6.10 Reporting systems for our students

- Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
- We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.
- To achieve this, we will:
 - put systems in place for students to confidently report abuse
 - ensure our reporting systems are well promoted, easily understood and easily accessible for students
 - make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback
 - Students will report their concerns by:

- Speaking directly to a member of staff they feel comfortable with (who will pass the concern to the DSL/deputy DSL's).
 - Speaking directly to a member of the Safeguarding Team.
 - Emailing safeguarding@kingshawthornes.com
 - Use the self-reporting student portal
- Students are made aware of the reporting systems through:
 - Discussion in the relationships/sex education curriculum
 - School notice boards/posters in classrooms
 - Assemblies/ASPIRE sessions
 - Boot camp curriculum
 - How students will feel safe in submitting any concerns:
 - Personal reassurances following disclosures
 - Identify a key adult to support needs

7. Online safety and the use of mobile technology

- We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
- To address this, our school aims to:
 - have robust processes in place to ensure the online safety of students, staff, volunteers and governors
 - protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
 - set clear guidelines for the use of mobile phones for the whole school community
 - establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- educate students about online safety as part of our curriculum. For example:
 - i. The safe use of social media, the internet and technology
 - ii. Keeping personal information private
 - iii. How to recognise unacceptable behaviour online
 - iv. How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim
- train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - i. staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present
 - ii. staff will not take pictures or recordings of students on their personal phones or cameras
- make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

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

8. Notifying parents or carers

- Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
- Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
- If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the

other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

- The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):
 - meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
 - meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g., moving them out of classes with the victim, and the reason(s) behind any decision(s)

9. Students with special educational needs, disabilities, or health issues

We recognise that students with special educational needs and/or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- the potential for students with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges

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

- Key person identified to support needs.
- Appropriate language and environment considered when dealing with incidents.
- Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the SENDCo.

10. Students with a social worker

- Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.
- The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare, and educational outcomes. For example, it will inform decisions about:
 - responding to unauthorised absence or missing education where there are known safeguarding risks
 - the provision of pastoral and/or academic support

11. Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, Mrs E Spencer, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#). The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

12. Complaints and concerns about school safeguarding policies

12.1 Complaints against staff

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

12.2 Other complaints

Safeguarding related complaints of other types; for example, those related to students or premises will be handled under the trust's complaints policy procedure. If there are serious concerns, complainants may wish to contact the local authority designated officer (LADO) who has local responsibility for safeguarding or the multi-agency safeguarding hub (MASH) for the school's relevant local council. LADO contact information can be found at the front of this policy.

12.3 Whistleblowing

We believe whistle blowing is the reporting of suspected wrongdoing in the workplace which is regarded as making a disclosure in the public interest. We actively encourage all school personnel and visitors to any of the GST schools to report any serious concerns they may have by following this procedure:

Stage One

- any concerns should be made in person or in writing.
- the person raising the concern may wish to receive help from the local authority or from their trade union representative.
- at any future meeting the employee may be accompanied by a colleague or their trade union representative.

Stage Two

- within 10 working days, the person with whom the concern has been registered acknowledges receipt of the concern in writing
- the letter will state the following:
 - how the concern will be dealt with
 - how long it will take to provide a final response to the concern
 - information on employee support services.

Stage Three

- after initial enquiries have been conducted, a decision will be made if an investigation should take place.
- the investigation will be either:
 - an internal investigation
 - a referral to the police
 - a referral to the council auditor
 - an external independent enquiry.

Stage Four

- the employee will be informed in writing of the outcome of the investigation by the board of trustees/LAC
- the employee has the right to take their concern to an independent body if they feel it has not been addressed adequately.

For more information, please see the trusts whistleblowing policy.

13. Record-keeping

We will hold records in line with our records retention schedule (IRMS Toolkit for School). All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file. Accompanying each file must be the child protection transfer form along with acknowledgement of receipt.

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

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

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school. If a student leaves the school to join another school, the safeguarding records will be copied and the originals securely transferred to the student's new school along with the transfer of records form. King's Leadership Academy Hawthornes will keep the copy of the record for 1 month post the student leaving. This is to ensure that the data is not lost in transition. Following the 1-month period, and only after confirmation that the file has been received by the other school, the record will be securely destroyed. If the student completes their education with King's Leadership Academy Hawthornes, the school will keep the safeguarding record until the student turns 25 years old (date of birth plus 25 years).

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

- School records are electronic using the platform CPOMS
- Paper school records are kept securely in a locked filing cabinet (keys kept in the school safe) in a room with a separate lock to the main school doors/classrooms.
- The school shares confidential information with other agencies via professional meetings and using Egress secure email - in line with the local safeguarding procedures.

In addition:

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

14. Training

14.1 All staff

- All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.
- This training will be regularly updated and will:
 - be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
 - be in line with advice from the three safeguarding partners
 - have regard to the teachers' Standards to support the expectation that all teachers:
 - i. manage behaviour effectively to ensure a good and safe environment
 - ii. have a clear understanding of the needs of all students
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

- Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- Volunteers will receive appropriate training, if applicable.

14.2 The DSL and deputy DSL/deputies

- The DSL and deputy DSL/deputies will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training.

14.3 Trustees and Local Governors

- All trustees and governors receive training about safeguarding and child protection (including online safety) at induction, which is updated annually. This is to make sure that they:
 - Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
 - Can be assured that those safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach and culture to safeguarding
- The lead trustee for safeguarding and the link governors for safeguarding will receive further, more in-depth training to help them fulfil their roles effectively.
- The chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the principal, training will be sourced as and when required for these individuals in managing allegations for this purpose.

14.4 Recruitment – interview panels

- At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.
- See appendix 2 of this policy for more information about our safer recruitment procedures.

14.5 Staff who have contact with students and families

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

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people based on their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

- 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 recognize children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
- We give special consideration to children who:
 - Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
 - Are young carers
 - May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
 - Have English as an additional language
 - Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
 - Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
 - Are asylum seekers
 - Are at risk due to either their own or a family member’s mental health needs
 - Are looked after or previously looked after (see section 12)
 - Are missing from education
 - Whose parent/carer has expressed an intention to remove them from school to be home educated

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any student and it helps to promote equality at this academy.

Race Disparity Audit

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment, and the criminal justice system.

The educational section of the audit that covers differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this academy.

Monitoring, Evaluation and Review

The policy will be promoted and implemented throughout all Trust academies. The Trust will monitor the operation and effectiveness of arrangements referred to in this policy at each Trust secondary academy.

The Trust will review this policy annually in consultation with each Trust secondary academy.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Local Academy Council and/or the Trust Board for further discussion and endorsement.

Linked Policies

This policy links to the following policies and procedures:

- Anti-bullying policy
- Behaviour policy

- Staff code of conduct policy
- Complaints policy
- Health and safety
- Attendance policy (including CME procedures)
- Online safety policy
- ICT acceptable use policy
- Mobile phone use (staff and students)
- Equality and diversity policy
- Relationships and sex education policy
- First aid policy
- Curriculum policy
- Designated teacher for looked-after and previously looked-after children policy
- Low level concerns policy
- Data protection and privacy policy, including privacy notices
- Prevent risk assessment
- Searching/screening/confiscation policy
- Whistleblowing policy
- SEND policy

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

- Behaviour policy
- Online safety policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - i. Healthy and respectful relationships
 - ii. Boundaries and consent
 - iii. Stereotyping, prejudice, and equality
 - iv. Body confidence and self-esteem
 - v. How to recognise an abusive relationship (including coercive and controlling behaviour)
 - vi. 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
 - vii. What constitutes sexual harassment and sexual violence and why they're always unacceptable

Other Related Documents

This policy should be a working document that is fit for purpose. It represents the academy ethos, enables consistency and quality across the academy. It is also related to the following legislation and statutory guidance:

In addition, the following documentation is also related to this policy:

- This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#).

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

- This policy is also based on the following legislation:
 - Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of 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 guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
 - [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
 - [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and principal should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it’s proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment
 - [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
 - This policy also complies with our funding agreement and articles of association.

Appendices

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

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

- Ensure access to appropriate medical care or treatment

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

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

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

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

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

Once we have shortlisted candidates, we will carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

We will obtain references before confirming an appointment.

When seeking references, we will:

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

Before confirming any employment offer we will ask the candidate to;

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

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

New staff

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

- Verify their identity
- Obtain suitable references
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - for all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - for teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to the CEO, chief operations and strategic officer (COSO), central directors, principals, deputy/assistant principals, middle leaders.

Regulated activity means a person who will be:

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

Existing staff

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

- there are concerns about an existing member of staff's suitability to work with children; or
- an individual moves from a post that is not regulated activity to one that is; or
- there has been a break in service of 12 weeks or more
- we will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

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

Agency and third-party staff

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

Contractors

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

This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Members, Trustees and Local Governors

All schools include:

- All Members, Trustees and Local Governors will have an enhanced DBS check without barred list information.

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

- The chair of the trust board will have their DBS check countersigned by the secretary of state.
- All proprietors, trustees, local governors and members will also have the following checks:
 - a section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
 - identity
 - right to work in the UK
 - other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise students on work experience

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

Students staying with host families

- Where the school makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.
- Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

- This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:
 - behaved in a way that has harmed a child, or may have harmed a child, and/or
 - possibly committed a criminal offence against or related to a child, and/or
 - behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children, this includes behaviour taking place both inside and outside of school
- If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).
- We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
- A 'case manager' will lead any investigation. This will be the principal, the chair of the board where the CEO is the subject of the allegation or the chair of governors where the principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.
- Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

- Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.
- Based on an assessment of risk, we will consider alternatives such as:
 - redeployment within the school so that the individual does not have direct contact with the child or children concerned
 - providing an assistant to be present when the individual has contact with children
 - redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
 - moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
 - temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust
- If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police **before** consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

- we will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- the governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- we will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- we will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

- any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

- If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
- If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

- If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
- The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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

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

Record-keeping

- The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
- The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
- For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
 - a clear and comprehensive summary of the allegation
 - details of how the allegation was followed up and resolved
 - notes of any action taken, decisions reached and the outcome
 - a declaration on whether the information will be referred to in any future reference
- In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.
- Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

- Abuse can be reported, no matter how long ago it happened.
- We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
- Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

- This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
- Concerns may arise through, for example:
 - Suspicion
 - Complaint
 - Safeguarding concern or allegation from another member of staff
 - Disclosure made by a child, parent or other adult within or outside the school
 - Pre-employment vetting checks
- We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 6.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

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

- directly to the person who raised the concern, unless it has been raised anonymously
- to the individual involved and any witnesses
- the principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [low levels concerns policy, staff behaviour policy/code of conduct]. The principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#).

Record keeping

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

Records will be:

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

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

References

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

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

Appendix 4: specific safeguarding issues

Children missing from education

- A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.
- There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:
 - are at risk of harm or neglect
 - are at risk of forced marriage or FGM
 - come from Gypsy, Roma, or Traveller families
 - come from the families of service personnel
 - go missing or run away from home or care
 - are supervised by the youth justice system
 - cease to attend a school
 - come from new migrant families
- We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
- Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.
- If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

- Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
- The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
- The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- Indicators of CCE can include a child:
 - appearing with unexplained gifts or new possessions
 - associating with other young people involved in exploitation
 - suffering from changes in emotional wellbeing
 - misusing drugs and alcohol
 - going missing for periods of time or regularly coming home late
 - regularly missing school or education
 - not taking part in education
- If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

- Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.
- The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
- The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.
- CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.
- In addition to the CCE indicators above, indicators of CSE can include a child:
 - having an older boyfriend or girlfriend
 - suffering from sexually transmitted infections or becoming pregnant

- If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

- Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.
- Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.
- Child-on-child abuse is most likely to include, but may not be limited to:
 - bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
 - abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
 - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.
- If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 6.8 and 6.9 set out more detail about our school's approach to this type of abuse.
- When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

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

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

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#) scheme.

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

Homelessness

- Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- The DSL and deputy/deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
- Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

- So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
- Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
- All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

- The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.
- Section 6.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.
- Indicators that FGM has already occurred include:
 - a student confiding in a professional that FGM has taken place
 - a mother/family member disclosing that FGM has been carried out
 - a family/student already being known to social services in relation to other safeguarding issues

A girl:

- having difficulty walking, sitting or standing, or looking uncomfortable
 - finding it hard to sit still for long periods of time (where this was not a problem previously)
 - spending longer than normal in the bathroom or toilet due to difficulties urinating
 - having frequent urinary, menstrual or stomach problems
 - avoiding physical exercise or missing PE
 - being repeatedly absent from school, or absent for a prolonged period
 - demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - being reluctant to undergo any medical examinations
 - asking for help, but not being explicit about the problem
 - talking about pain or discomfort between her legs
- Potential signs that a student may be at risk of FGM include:
 - the girl’s family having a history of practising FGM (this is the biggest risk factor to consider)
 - FGM being known to be practised in the girl’s community or country of origin
 - a parent or family member expressing concern that FGM may be carried out
 - a family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
 - a girl:
 - i. Having a mother, older sibling or cousin who has undergone FGM
 - ii. Having limited level of integration within UK society
 - iii. Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - iv. Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - v. Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - vi. Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - vii. Being unexpectedly absent from school
 - viii. Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

- Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.
- Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e., we may only have 1 chance to speak to the potential victim and only 1 chance to save them.
- If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.
- The DSL will:
 - speak to the student about the concerns in a secure and private place
 - activate the local safeguarding procedures and refer the case to the local authority's designated officer
 - seek advice from the Forced Marriage Unit on 020 7008 0151 or fmufco.gov.uk
 - refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - endangers or causes serious violence to a person/people
 - causes serious damage to property; or
 - seriously interferes or disrupts an electronic system
- The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.
- Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.
- We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
- We will ensure that suitable internet filtering is in place and equip our students to stay safe online at school and at home.
- There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.
- Staff will be alert to changes in students' behaviour.

- The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:
 - refusal to engage with, or becoming abusive to, peers who are different from themselves
 - becoming susceptible to conspiracy theories and feelings of persecution
 - changes in friendship groups and appearance
 - rejecting activities they used to enjoy
 - converting to a new religion
 - isolating themselves from family and friends
 - talking as if from a scripted speech
 - an unwillingness or inability to discuss their views
 - a sudden disrespectful attitude towards others
 - increased levels of anger
 - increased secretiveness, especially around internet use
 - expressions of sympathy for extremist ideologies and groups, or justification of their actions
 - accessing extremist material online, including on Facebook or Twitter
 - possessing extremist literature
 - being in contact with extremist recruiters and joining, or seeking to join, extremist organisations
- Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.
- If staff are concerned about a student, they will follow our procedures set out in section 6.5 of this policy, including discussing their concerns with the DSL.
- Staff should **always** take action if they are worried.
- Further information on the school’s measures to prevent radicalisation are set out in other school policies and procedures

Sexual violence and sexual harassment between children in schools

- Sexual violence and sexual harassment can occur
 - between two children of any age and sex
 - through a group of children sexually assaulting or sexually harassing a single child or group of children
 - online and face to face (both physically and verbally)
- Sexual violence and sexual harassment exist on a continuum and may overlap.
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.
- If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.
- When supporting victims, staff will:

- reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
 - regularly review decisions and actions, and update policies with lessons learnt
 - look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
 - consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
 - remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs
- Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.
 - Staff should be aware of the importance of:
 - challenging inappropriate behaviours
 - making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
 - challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
 - If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 6.8 and 6.9 set out more detail about our school's approach to this type of abuse.

Serious violence

- Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
 - increased absence from school
 - change in friendships or relationships with older individuals or groups
 - significant decline in performance
 - signs of self-harm or a significant change in wellbeing
 - signs of assault or unexplained injuries
 - unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))
- Risk factors which increase the likelihood of involvement in serious violence include:
 - being male
 - having been frequently absent or permanently excluded from school
 - having experienced child maltreatment
 - having been involved in offending, such as theft or robbery

- staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL.
- All visitors must report to reception.
- All visitors must sign in using the electronic portal at the main reception. A photograph of your face will be taken and a visitor ID pass generated. This ID must be visible at all times.
- All visitors will be required to verify their identity to the satisfaction of staff.
- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
- All visitors must sign in on each occasion visiting the school.
- Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:
 - will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
 - the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)
- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.
- All visitors must sign out at the end of their visit.

Non-collection of children

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

- Keep the child in school with a key member of staff.
- Make contact with the parent/carers on the school system.
- Record on Bromcom/CPOMS depending on circumstance.

Missing students

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

- Hold at least **two** contact numbers for every child. These will be used as part of the 'First Day Calling/text process'.
- If a child left for school and has not arrived at school following communication with a parent/carer the police will be called.
- Lesson registers will be monitored throughout the day. If a child goes missing in the school day (following a reasonable enquiry/search of school and grounds) parent/carers will be informed. Police will be contacted within 20 minutes of this call if the whereabouts of the child are still unknown.

- **Notifying the Local Authority**
- We will notify the Local Authority of any child who fails to attend school regularly after making reasonable enquiries or has been absent without the school's permission for a continuous period of 10 days or more.
- We will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered missing from education.
- Where a child leaves the school without a destination or another school is not identified, our school follow Sefton Council Children Missing Education Procedures and they can be found at: [https://www.sefton.gov.uk/schools-learning/attendance-and-welfare/children-missing-education-\(cme\).aspx](https://www.sefton.gov.uk/schools-learning/attendance-and-welfare/children-missing-education-(cme).aspx). The school will liaise with Carole Blundell the Children Missing Education Co-ordinator who can be contacted on 0151 934 3181 or carole.blundell@sefton.gov.uk
- For our children who receive an education at another establishment but remain on our roll we will keep in touch each day with the alternative provision and follow school procedures for absence.
- **All incidents of children missing from school will be recorded on CPOMS**

Appendix 6: Safeguarding concerns form – allegations against staff

Safeguarding Concerns Form – Allegations Against Staff

CONFIDENTIAL



To be completed following the reporting of a safeguarding concern relating to a staff member or volunteer within the school. This may relate to a specific incident or may relate to an individual's general behaviour with or around pupils.

This form can be completed collaboratively with the principal, or the staff member may wish to complete the form themselves and return via secure email.

Where the concern relates to the principal the faculty for education HR team, or a senior member of the education team will complete the form with input from the staff member raising the concern.

DETAILS OF THE PERSON TO WHOM THE CONCERN RELATES

Name of staff member/volunteer	
Job title of staff member/volunteer	
Establishment of the staff member/volunteer	

DETAILS OF THE PERSON RAISING THE CONCERN (Add n/a if the concern has not been reported by a staff member)

Name	
Job title	
Establishment	
Date concern raised	

DETAILS OF THE PERSON WHO HAS RECEIVED THE CONCERN

Name	
Job title	
Establishment	
Date concern received	

What is the nature of the allegation/concern?

If the allegation/concern relates to a specific incident include the following details	
Date of incident	
Time of incident	
Location of incident	
Were there any other witnesses? If so, include names	

Has the staff member reporting the concerns had any previous concerns regarding this staff member/volunteer, or have concerns been raised previously?	YES/NO
If YES, please add further detail below	

To be completed by the principal/faculty for education team HR team /member of GST faculty for education team

Is the allegation/concern likely to meet the harms threshold?	YES/NO
Rationale for reaching this decision	

If **YES**, complete the **Safeguarding Risk Assessment – Allegations against staff** form to assess the level of risk and follow the steps outlined in the **Safeguarding Allegations Flowchart**.

If **NO**, complete the 'Agreed Actions' section below and follow the steps outlined in the **Safeguarding Allegations Flowchart**.

AGREED ACTIONS

Consideration should be given to appropriate actions that will support the reduction of risk, for example, training and development, discussion with the employee regarding concerns, review of policies or processes, peer support and monitoring of future behaviour.

Action	Desired outcome	Timescale	Responsible Officer

Appendix 7: Safeguarding risk assessment form – allegations against staff

Safeguarding Risk Assessment Form – Allegations Against Staff

CONFIDENTIAL

To be completed by the principal (or member of the GST central HR Team or senior member of the GST faculty for education team if it relates to the principal) if an allegation/concern may meet the harms threshold.

The purpose of the safeguarding risk assessment is to identify:

- If there is any risk to children, young people or adults with whom the employee has contact with, in a position of trust
- Whether the allegation/concern meets the harms threshold
- How any risk identified should be best managed
- Whether the employee is safe to continue in their role
- Any future implications should the employee continue in their role

BACKGROUND

Name of staff member/volunteer	
Job title of staff member/volunteer	
Establishment	
Date DBS checked	
Outcome of DBS check	

Are there any children present in the household of the employee?	YES/NO/UNKNOWN
If YES, please provide gender and age details	
Gender	Age

What is the nature of the allegation/concern? <i>Refer to the Safeguarding Concerns – Allegations against staff form</i>

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If the allegation/concern relates to a specific incident include the following details	
<i>Refer to the Safeguarding Concerns – Allegations against staff form if this has been completed</i>	
Date of incident	
Time of incident	
Location of incident	
Were there any other witnesses? If so, include names	

RISK ASSESSMENT FACTORS

On the basis of the evidence available, professional judgement and experience, the level of risk should be assessed as follows for the appropriate risk assessment factors below:

- Low risk (L)
- Moderate risk (M)
- High risk (H)
- Severe risk (S)

Risk Assessment Factor:	Risk L/M/H/S
What is the specific allegation/offences? <i>Assess the risk based on the gravity of the allegations or offence</i>	
Is the matter being dealt with by another professional agency e.g., Police or Local Authority Safeguarding Officer?	This question does not need to be rated.
If the matter is currently being dealt with by another agency, what is the current position of the investigation or intervention?	This question does not need to be rated.
How severe is the harm (threatened or inflicted) and are there any children and/or other vulnerable adults involved? <i>Assess severity of harm threatened or inflicted</i>	
Is there evidence to suggest that the harm is likely to continue or escalate?	

<i>Assess the risk based on the likelihood of the harm continuing or escalating</i>	
Is there evidence to suggest that the harm was premeditated?	
<i>Assess the likelihood of the harm involving premeditation</i>	
Is there evidence to suggest that the harm was accompanied by sustained threats or coercion?	
<i>Assess the likelihood of the harm involving threats or coercion</i>	
Is there a pattern of history for this type of behaviour?	
<i>Assess the level of risk based on previous behaviour, frequency and severity</i>	
What is the risk of harm posed to other children or adults?	
<i>What is the likelihood of harm to the child or adults?</i>	
Have there been any previous concerns or complaints?	
<i>Assess the level of risk based on previous history, frequency and seriousness of issues</i>	
What has been the impact on the employee's health and wellbeing?	
<i>What is the level of risk based on the employee's current health</i>	
Is the employee receiving any medical support? If not, is this intended?	
<i>Assess the level of risk incurred from medication or existing treatment plan</i>	

RISK ASSESSMENT SUMMARY

Overall assessment of risks identified, including the risk to others:

Views and recommendations of professional agency e.g., Police/Local Authority or Safeguarding Officer
Views and recommendations of Risk Assessor
Views of Individual (if appropriate)

On the basis of the evidence available, professional judgement and experience, the level of overall risk should be assessed as follows for the appropriate risk assessment factors below:

Low risk (L): No safeguarding action is required and/or safeguarding issues have been addressed

Moderate risk (M): Safeguarding protection plan is required to manage the risk and/or remains in place in this area/overall

High risk (H): Safeguarding Protection Plan requires implementation. Legal action is being taken. The behaviour is persistent and/or deliberate

Severe risk (S): Life may be in danger, risk of major injury or serious physical or mental ill harm. The incidents are increasing in frequency and/or severity.

<p>Overall Risk</p> <p>Low/Moderate/High/Severe</p>

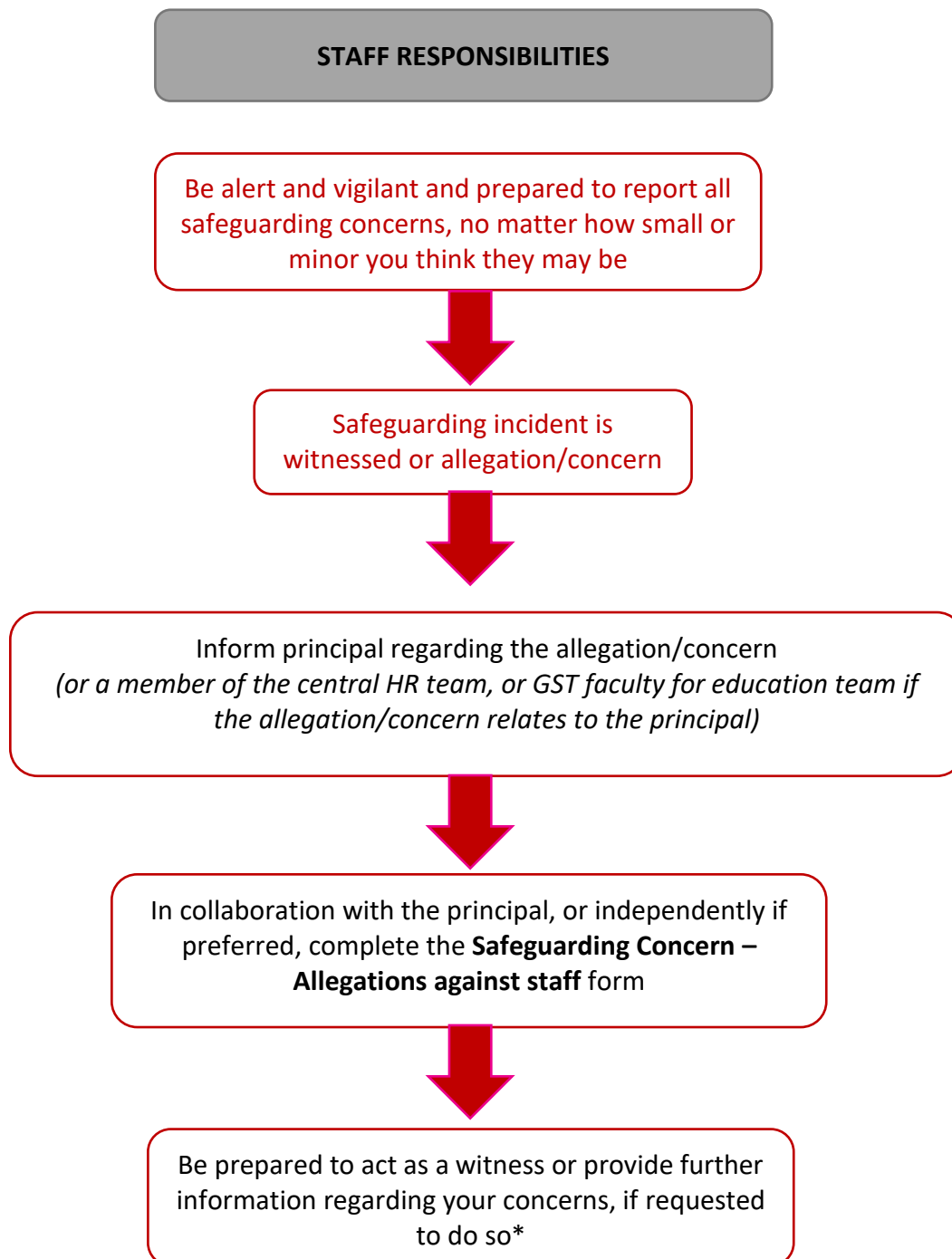
AGREED ACTIONS

Consideration should be given to appropriate actions that will support the reduction of risk, for example, training and development, supervision, peer support alternative duties and access to occupational health services. In some circumstances suspension may be required to manage risk.

Action	Desired outcome	Timescale	Responsible Officer

Risk Assessor name	
Risk Assessor signature	
Risk Assessor job title	
Date of Risk Assessment	
Date of Review	

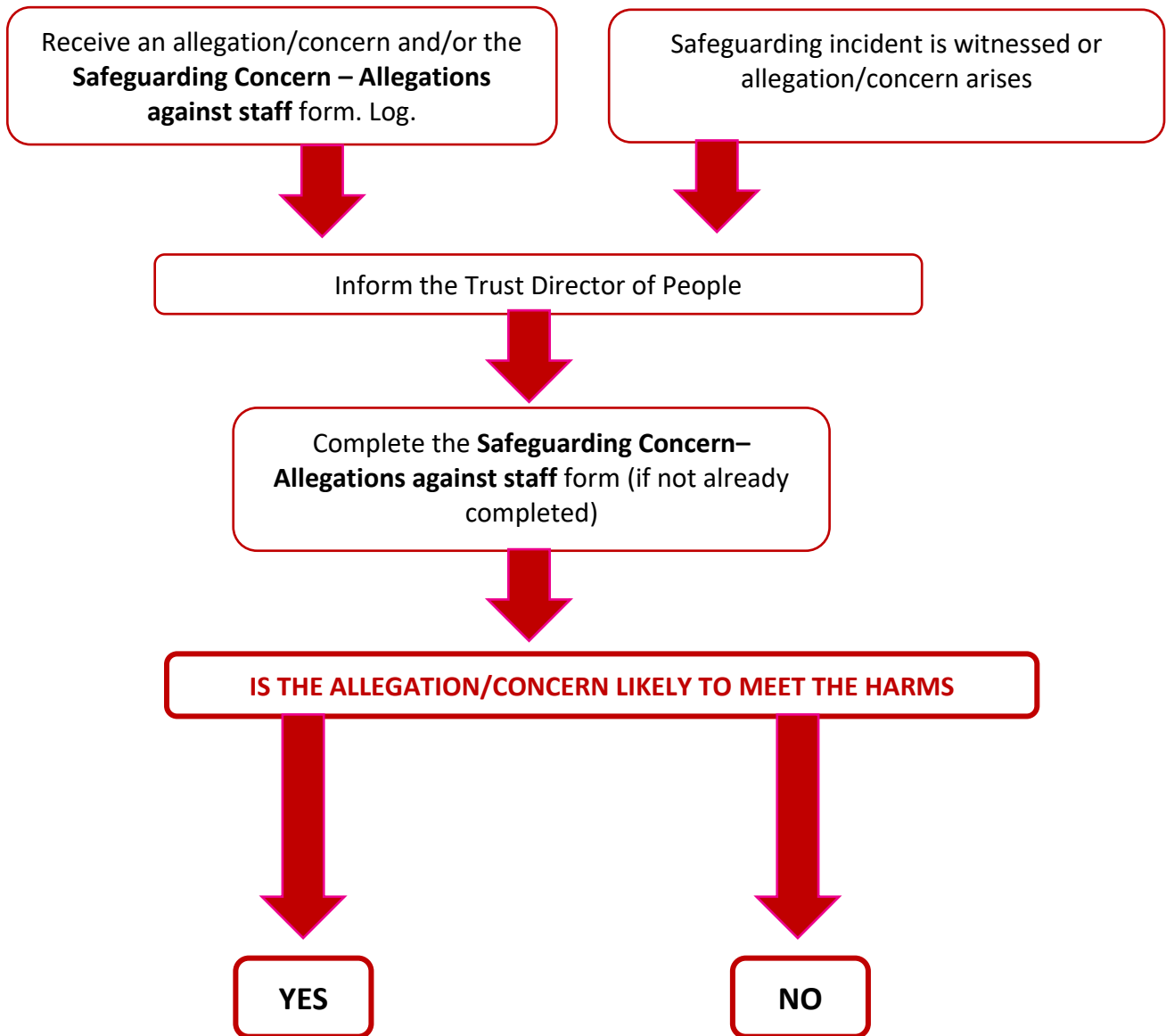
Appendix 8: Safeguarding incident involving a member of staff and a pupil(s)

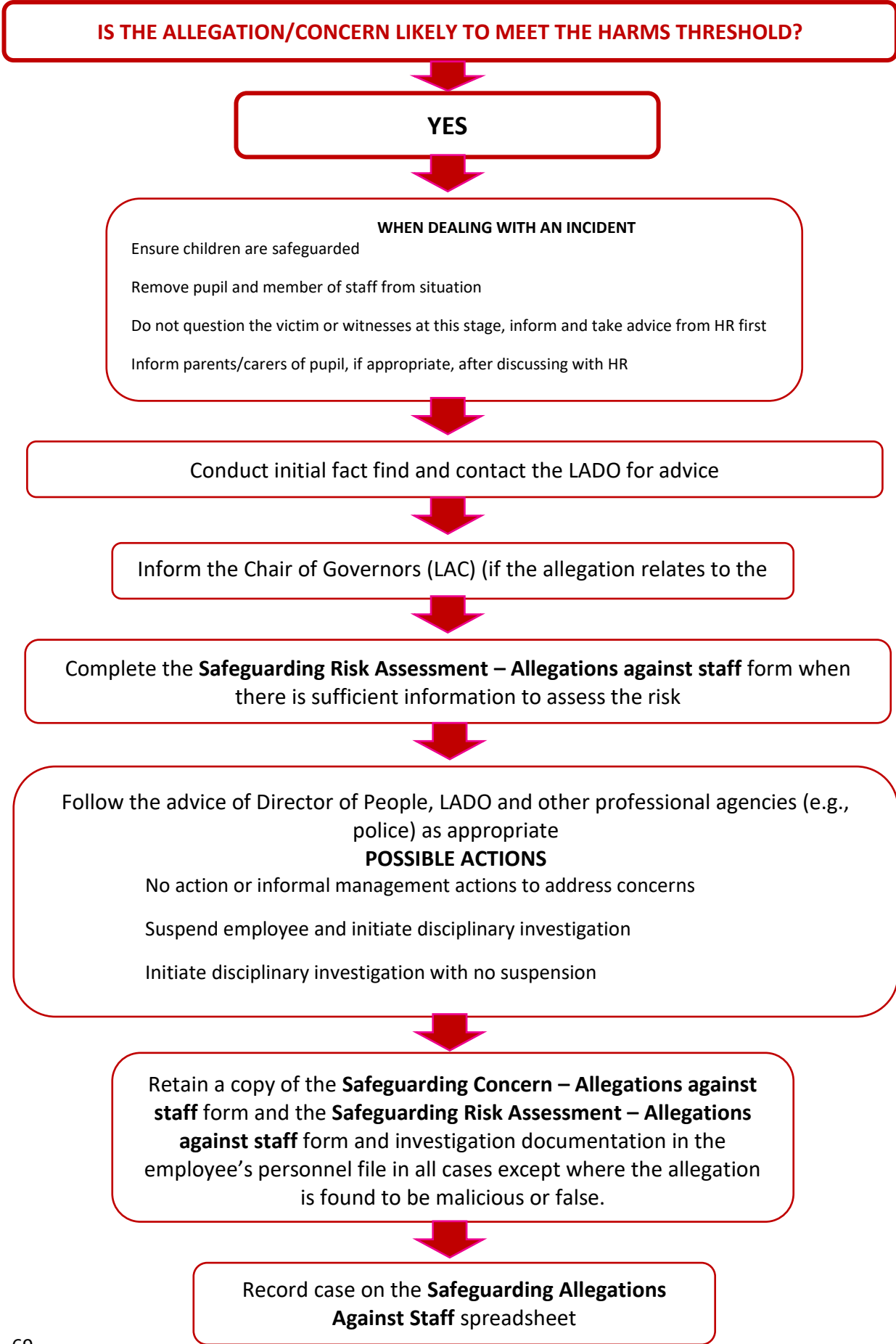


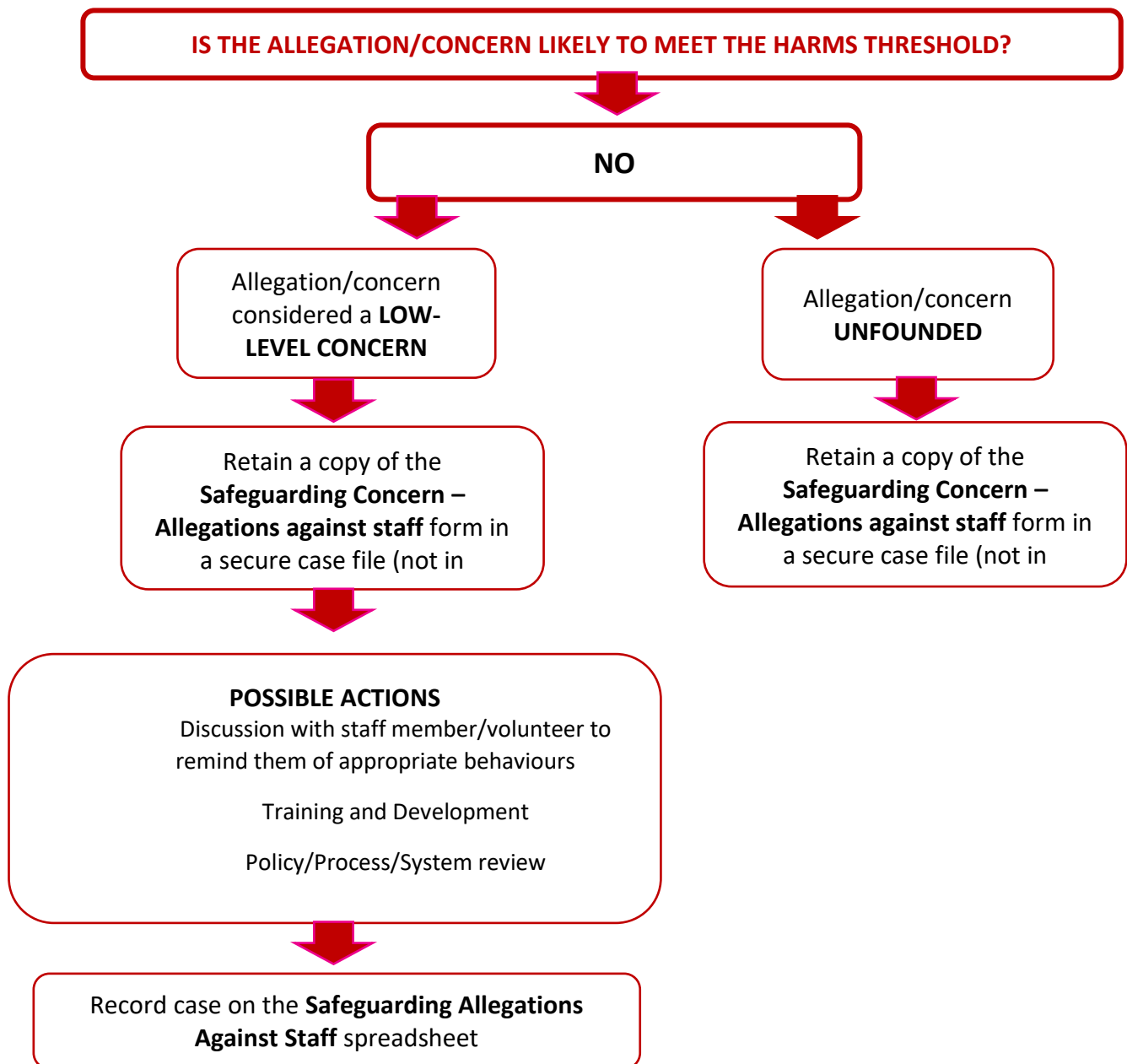
*Any employee raising an allegation/concern can request anonymity, and this will be respected wherever reasonably possible. However, this may not be possible in all cases.

PRINCIPAL RESPONSIBILITIES*

*Or a member of the Faculty for Education HR team / senior member of the GST faculty for education team if the allegation/concern relates to the principal







Appendix 9: Child protection file – front sheet

Child Protection File

Front Sheet

Pupil name			
Date of birth			
Any other name by which child is known			
Home address		Current address (if different)	
Contact tel no.		Contact telephone no.	
Family members i.e., parents / carers / siblings			
Name	Relationship	Address	School Details <small>(in the case of siblings)</small>
Date file started			
Are records held in school relating to other connected children?			
Contact details of other professionals			
Name	Agency	Address	

Appendix 10: Child protection file – removal of information record

Child Protection File

Removal of Information Record

Pupil Information	
Pupil name	
Date of birth	
Removal of Information	
Date documents or complete file removed	
Name and role of person removing documents or complete file	
Signature of person removing documents or complete file	
List documents removed (or complete file)	
Reason for removal	
Replacement of Information	
Date documents or complete file replaced:	
Were all documents replaced?	Yes / No
If all documents are NOT replaced, please record which documents have not yet been replaced, along with the location of such documents and reason for such documents not having been replaced.	
Name and role of person replacing documents or complete file	
Signature of person replacing documents or complete file	

Appendix 11: Child protection file - record of child protection file transfer

Record of Child Protection File Transfer

PART 1: TO BE COMPLETED BY SENDING/TRANSFERRING SCHOOL

Name of child	
D.O.B.	
Name of school sending CP File	
Address of sending school	
Date file sent	
Name of Principal / Designated Safeguarding Lead	
Method of delivery	
Signature	

PART 2: TO BE COMPLETED BY RECEIVING SCHOOL

Name of school/college receiving file	
Address	
Date received	
Name of principal/ Designated Safeguarding Lead receiving file	
Had the file been tampered with in transit?	
Signature	



Annual Safeguarding Declaration

1. I have read and understood the School's Safeguarding and Child Protection Policy, including the appendices.
2. I have read and understood Part 1 and Part 5 of the DfE guidance 'Keeping Children Safe in Education', (DfE 2022).
3. I have read and understood the Trust Staff Code of Conduct.
4. I have read and understood the social media policy.
5. I have completed the school's safeguarding training, including Prevent training.
6. I understand that supplementary safeguarding guidance is available at www.gov.uk
7. I agree to adhere to the protocols set out in the School's Safeguarding and Child Protection Policy, the Staff Code of Conduct and the DfE guidance 'Keeping Children Safe in Education', (DfE 2022).
8. I do not have any new cautions or convictions that would show on a DBS since my last certificate was issued. (If you do, please speak to your line manager or principal as soon as possible).

Print name:

Sign:

Date:

Summary of changes in this version

Page Number	Paragraph Number	Information
		Re-write September 2022

