

THE EDUCATION VILLAGE ACADEMY TRUST



Safeguarding and Child Protection Policy

EVAT VERSION CONTROL DOCUMENT

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This policy is reviewed **annually** by the Policy Owner: **A Lynch**

The scheduled review date for this policy is **September 2023**.



At The Education Village Academy Trust, all children, young people and adults are valued both as individuals and as part of the wider Trust community. We aim to provide a safe, happy and caring environment within which everyone can thrive.

Core values

Our Trust's activities are informed by our core values, which mean that we:

1. recognise the **worth** of each **individual** by valuing the personal qualities they demonstrate in their learning, living and working
2. recognise the **experiences** of children and young people by valuing the **talents** and **skills** they bring into their schooling, and we commit to ensuring that schooling enhances these talents and skills
3. embrace **difference** and **harmony** by valuing **diversity**
4. display **integrity** and **authenticity** by valuing **openness, trust, fairness, honesty** and **respect** for all people
5. foster **ambition, high aspirations** and **independent** spirit by valuing each individual's abilities, aptitudes and desire to create, explore and grow
6. commit to **hard work** and **high standards** in provision, behaviours and outcomes
7. help, support and enable others by valuing **relationships** with all stakeholders, being **emotionally intelligent**, building **resilience** and being **forward-looking**
8. acknowledge the role of **networks** by valuing the ways in which people can live together, collaborate and make positive contributions as **citizens**
9. acknowledge the place of school in the **community**, including the broader **global** community, by valuing the essential nature of the relationship between schools and the social and economic environments in which they operate

This policy, and its associated procedures and protocols, are based on these key principles.

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N.B. Where reference is made to an 'Academy' or a 'School' the intention is that the policy is universal and applies to both. Any reference to Principal may also include another member of the Executive Leadership Team (ELT) or Senior Leadership team (SLT).

Statement of Intent

The Education Village Academy Trust (EVAT) is committed to safeguarding and promoting the welfare, both physical and emotional, of every pupil both inside and outside of the trust premises. We implement a whole-academy vigilant and preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect or exploitation.
- Ensuring that members of the Board of Trustees (BOT), Education Standards Committee (ESC), the Principals and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and know to refer concerns to the designated safeguarding lead in each academy or school (DSL).
- Ensuring that the Principals and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.
- Please see the table below of DSLs in each academy or school:

Academy/School	Designated Safeguarding Lead (DSL)	Deputy Designated Safeguarding Lead (DDSL)
Haughton Academy	Deputy Headteacher - Su Gill	Laura Wilson Jenny Gregg
Springfield Academy	Principal - Richard Gartland	Paula Austin Kathryn White
Beaumont Hill Academy	Deputy Headteacher - Gemma Elysee	Nicole Garstin Caroline Green Adrian Lynch
Gurney Pease Academy	Principal - Alison Sinclair	Simon Heritage Jo Gartland
Marchbank Free School	Head of School – Tess Wright	Hannah Kelly Caroline Green

- The Trust has appointed Chris Ashford, an experienced safeguarding professional, to its Board of Trustees to lead on Safeguarding.
- Each academy or school have appointed Educational Standards Committee members to Link Safeguarding and Child Protection roles.

1. Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

For the purposes of this policy, “**safeguarding** and **protecting the welfare of children**” is defined as:

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

“**Safeguarding**” and “**promoting the welfare of children**” is defined for the purposes of this policy as: protecting ALL children from maltreatment and abuse (including in addition to the four categories of harm, issues such as sexual violence and sexual harassment, child criminal exploitation (CCE), child sexual exploitation (CSE), honour-based abuse (HBA) inclusive of female genital mutilation (FGM) and forced marriage, preventing radicalisation (extremism, radicalisation and terrorism), harassment, bullying and victimisation, preventing impairment of children's health (physical and mental health) or development); ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. This includes everyone under the age of 18.

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not

reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **“sexual harassment”** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of the academy. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **“upskirting”** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

2. Legal framework and other guidance

This policy has been created with due regard to all relevant legislation and national and local guidance, including, but not limited to, the following:

- Children Act 1989/2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (Academy Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Darlington Safeguarding Children Partnership Arrangements
- Data Protection Act 2018
- DfE Statutory framework for the Early Years Foundation Stage (EYFS) 2017
- Education Act 2002 Section 175
- Equality Act 2010
- Information Sharing: Advice for Practitioners providing safeguarding services
- Freedom of Information Act 2000
- DfE (2021) 'Keeping children safe in education 2021
- Non-Maintained Special Schools (England) Regulations 2015
- Safeguarding Vulnerable Groups Act 2006
- School Attendance: Guidance for Schools HM Government (2014) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2018) 'Working together to safeguard children'
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Childcare Act 2018'
- DfE (2018) 'Child sexual exploitation'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges
- Domestic Abuse Act 2021

This policy operates in conjunction with the following trust policies:

- Protecting Children from Extremism and Radicalisation Policy
- Managing Allegations Against Staff Policy
- Behaviour Policy for each Academy
- Whistleblowing Policy
- Anti-Bullying Policy
- Visitor Policy
- Photography Policy (Annex 3 GDPR Data Protection Policy)
- Records Management Policy
- LAC Policy
- General Data Protection Regulation (GDPR) Data Protection Policy
- Safer Recruitment Policy
- Careers Education, Information, Advice and Guidance (CEIAG) Policy
- Other Guidance

- UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017)
- Peer-on-Peer Abuse Policy
- E-Safety Policy
- Staff Code of Conduct

3. Roles and responsibilities

EVAT Trustees have a duty to:

- Take strategic leadership responsibility for the trust's safeguarding arrangements.
- Ensure that each academy complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the Trust are effective and comply with the law at all times.
- Guarantee that the Trust contributes to inter-agency working in line with the statutory guidance Working Together to Safeguard Children (2018).
- Confirm that the safeguarding arrangements in each academy take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part One of KCSIE.
- Ensure that staff who do not work directly with children read either Part One or Annex A of KCSIE.
- Ensure that mechanisms are in place to assist staff to understand and discharge their roles and responsibilities in regard to safeguarding children.
- Ensure a Trustee takes leadership responsibility for safeguarding arrangements.
- Ensure that the Chief Executive Officer (CEO) is nominated to liaise with the LA and/or partner agencies in the event of allegations of abuse made against the principal.
- Ensure that a member of each academy's Education Standards Committee (ESC) is nominated to liaise with the LA and/or partner agencies in the event of allegations of abuse made against another ESC member.
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Ensure that there is a lead responsible for safeguarding arrangements in each academy.
- Appoint a member of staff from the senior leadership team of each academy (SLT) to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Facilitate a whole-trust approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

- Ensure systems are in place for children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback. These systems will be well-promoted, easily understood, and easily accessible.
- Make sure that pupils are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff members are appropriately trained to support pupils to be themselves when attending the academy, e.g. if they are LGBTQ+.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place in order to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher in each academy to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual schools head to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the pupil's legal status, contact details and care arrangements.

- Put in place appropriate safeguarding responses for pupils who go missing from an academy setting, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the Education Standards Committee (ESC) have been subject to an enhanced DBS check.

The Principal of each academy has a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.
- Ensure that the policies and procedures adopted by the EVAT trustees, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Provide staff, upon induction, with the Safeguarding and Child Protection Policy, Staff Code of Conduct, part one of the Keeping Children Safe in Education (KCSIE) (2021) guidance, the relevant academy Behaviour Policy, the local authority safeguarding response to children who go missing from education, online safety training, and the identity of the DSL and any deputies.
- Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Academy in this.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
- Ensure an effective whole trust policy against bullying/online bullying inclusive of measures to prevent all forms of bullying among pupils, is in place.
- Ensure a whole academy policy about managing behaviour and discipline including the use of reasonable force, is in place.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety.
- Refer cases of suspected abuse to the local authority children's social care as required.
- Support staff who make referrals to local authority children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Support staff who make referrals to the Channel programme.
- Refer cases where a crime may have been committed to the Police as required.
- Act as a point of contact with the three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups).
- Liaise with the Principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.

- Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at the academy. This includes:
 - Ensuring that the academy knows which pupils have or have had a social worker.
 - Understanding the academic progress and attainment of these pupils.
 - Maintaining a culture of high aspirations for these pupils.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensuring that child protection files are kept up-to-date and only accessed by those who need to do so.
- Act as a source of support, advice and expertise for all staff.
- Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- Undertake Prevent awareness training.
- In addition to the formal training set out above, their knowledge and skills should be refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.
- Understand the processes, procedures and responsibilities of other agencies, particularly children's social care, so they understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- Understand the importance of information sharing, both within the Trust and with the three safeguarding partners, other agencies, organisations and practitioners.
- Keep detailed, accurate, secure written records of concerns and referrals.

- Understand and support the Academy with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online.
- Recognise the additional risks that children with SEN and disabilities face online, for example, from online bullying, grooming and radicalisation and be confident they have the capability to support SEND children to stay safe online.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Academy may put in place to protect them.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including in each academy, with other school settings, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and academy staff.
- Support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- Where children leave the Academy (including for in-year transfers) the Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or college as soon as possible and within five days. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENDCos or the named person with oversight for SEN in colleges, are aware as required.
- In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

- The DSL should inform the LA of any pupil to be deleted from academies admission register and follow missing from education protocols.
 - Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
 - Contribute to the assessment of children, and/or support other staff to do so. Arrange, alongside the school, adequate and appropriate cover for any activities outside of academy hours or terms.
 - Keep cases of early help under constant review and escalate cases where a situation does not appear to be improving.
 - Be available at all times during academy hours to discuss any safeguarding concerns.
- N.B.** The academy will determine what “available” means, e.g. it may be appropriate to be accessible by electronic means such as phone or Teams.

Each Academy must appoint a designated teacher who should work with the local authority to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher must have appropriate training and the relevant qualifications and experience. Further information can be found in the Statutory Guidance **The designated teacher for looked after and previously looked-after children (February 2018)**.

All staff members have a responsibility to:

- Read and understand Keeping Children Safe in Education (KCSIE 2021). KCSIE 2021 contains information on what academies within EVAT **should** do and sets out the legal duties that all staff in the Trust must comply with. It should be read alongside Working Together to Safeguard Children 2018. The Children Act 1989 sets out the legal framework.
- Everyone who comes into contact with children and their families has a role to play in safeguarding children. EVAT Staff hold a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for children and to prevent concerns from escalating. Children can make disclosures or show signs of abuse at any time and to any individual and safeguarding incidents can occur within the Academy. Therefore, through a thorough induction process and the sharing of this policy to all staff, pupils and volunteers, it is important that ALL staff:
 - Ensure that they listen to and reflect on the voice of the child at ALL times and take seriously any concerns raised to them by a child.
 - Be aware of the role and identity of the DSL and deputy DSLs.
 - Be aware of safeguarding issues that can put pupils at risk of harm.

- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.
- Ensure that they report ANY concerns of harm to any child to the Designated Safeguarding Lead immediately. (However, ALL staff can refer their concerns directly to CIAT (Children's Initial Assessment Team) if necessary and the police in the stated incidents above. They should inform the Designated Safeguarding Lead as soon as possible if they have reported concerns directly).
- Ensure that they immediately share with the Designated Safeguarding Lead information shared with them by a child or directly observed/witnessed and record it. This could include sharing information on behalf of the Designated Safeguarding Lead with other agencies. All discussions, decisions and reasons for them should be recorded in writing using CPOMS.
- Ensure that they maintain an attitude of 'it could happen here' and report any concerns regarding the behaviour of a child/an adult/staff member in academy directly to academy Safeguarding Leads in line with their annual Safeguarding Level 1 Training which all staff must undertake.
- Ensure that they feel able to raise concerns about poor or unsafe practices of staff and potential failures in the academy's safeguarding regime through whistleblowing procedures and the Code of Conduct policy.
- Ensure that they attend regular formal training/updates at least annually to support them in recognising the signs and symptoms of abuse, particularly in support of early identification of needs of children to prevent an escalation of need or risk to the child.
- Ensure that under the Counter Terrorism and Security Act, April 2015, that the academy has 'due regard to Prevent' and to assess risk of children and young people being radicalised or drawn into extremism/terrorism (based upon potential risks in local area and that clear protocols are in place for all visitors so that their views are appropriate and not an opportunity to influence others).
- Ensure mandatory reporting to the police in all cases where teachers discover that an act of FGM appears to have been carried out.
- Ensure that they understand through online safety training the additional risks for pupils online and continue to promote the academy's Online Safety Policy/acceptable usage in the protection of all pupils.
- Ensure that they remain vigilant whilst visitors are on site and continue to promote EVAT's commitment to keeping children safe through reminding visitors and parents of the academy's appropriate use of personal mobile phones/devices whilst they are on Trust premises. This includes staff understanding and adhering to the Staff Behaviour Policy inclusive of use of mobile phones and electronic devices.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Teachers, including the principal, have a responsibility to:
 - Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.

4. Multi -agency working

The academy contributes to Multi-agency working as part of its statutory duty. The academy will be fully engaged, involved, and included in local safeguarding arrangements.

Once the academy is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The academy will act in accordance with the safeguarding arrangements.

The academy will work with Darlington Children's Social Care, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support.

The academy recognises the importance of information sharing between professionals and local agencies in order to effectively meet pupils' needs.

In light of the above, staff members are aware that whilst the GDPR places a duty on academies to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will refer to the academy Principal and Designated Safeguarding Lead in regard to information sharing to protect a young person from harm. The Trust also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE) and criminal exploitation.

5. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

- Have SEND (whether or not they have a statutory EHC plan).
- Are disabled and have specific additional needs.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing/going missing from care or from home
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or sexual or criminal exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Have family members in prison, or are affected by parental offending.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.

- Are persistently absent from education, including persistent absences for part of the academy day.
- Show early signs of abuse and/or neglect in other ways.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

All staff will be made aware of the local early help process and understand their role in it.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

6. Abuse and neglect

All members of staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another. Staff are also aware that harm now includes the impairment of a child's health or development as a result of witnessing the ill-treatment of another person.

Through effective annual safeguarding training and regular updates, all staff members will be aware of the indicators of abuse and the appropriate action to take following a pupil being identified as at potential risk of abuse or neglect.

All staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in the Trust's Anti-Bullying Policy.

All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and youth-produced sexual imagery, and will understand that these put pupils in danger.

Staff members will be aware of the effects of a pupil witnessing an incident of abuse, such as witnessing domestic violence at home.

Types of abuse and neglect

For the purposes of this policy, **“abuse”** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **“physical abuse”** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **“emotional abuse”** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

For the purposes of this policy, **“sexual abuse”** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **“neglect”** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care

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

All staff will be aware of the indicators of abuse and neglect. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms).

All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, "**domestic abuse**" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. "Personally connected" includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The academy will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Operation Encompass operates in the Durham Police Force. It helps police and school settings to work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated

safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

7. Homelessness

The DSL and deputy(-ies) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

Referrals to the Local Housing Authority do not replace referrals to CIAT where a child is being harmed or at risk of harm.

It should also be recognised in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year olds who may be homeless and/or require accommodation.

8. Children missing from education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation.

Staff will monitor pupils that go missing from the academy, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures. The academy will inform the LA of any pupil who fails to attend regularly or has been absent without the academy's permission for a continuous period of 5 academy days or more.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the academy, or when the academy has been notified that the pupil will first be attending. The academy will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The academy will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contact details will be held for each pupil where possible. Staff will monitor pupils who do not attend the academy on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the academy that their child will live at a different address, the academy will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the academy that their child will be attending a different school setting, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school.
- The date on which the pupil first attended, or is due to attend, that school.

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the academy will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the academy by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the academy, and no longer live within a reasonable distance of the premises.
- Have been certified by medical professional as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend the academy after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the academy does not reasonably believe they will be returning at the end of that period.
- Have been permanently excluded.

The academy will also remove a pupil from the admissions register where the academy and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the academy will provide the LA with the following information:

- The full name of the pupil.
- The full name and address of any parent with whom the pupil lives.

- At least one telephone number of the parent with whom the pupil lives.
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable.
- The name of the pupil's new school and the pupil's expected start date there, if applicable.
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

The academy will work with the LA to establish methods of making returns for pupils back into the academy. The academy will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

9. Child abduction and community safety incidents

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the academy that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

10. Child criminal exploitation (CCE)

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants.
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The academy will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity

appears consensual. The academy will also recognise that pupils of any gender are at risk of CCE.

Academy staff will be aware of the indicators that a pupil is the victim of CCE, including:

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

County lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, academy staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

11. Cyber-crime

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.

- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

12. Child sexual exploitation (CSE)

For the purposes of this policy, "**child sexual exploitation**" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence.

The academy will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The academy will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The academy will also recognise that pupils may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Academy staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the academy's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered,

including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The academy will cooperate as needed.

13. Modern slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

14. Female genital mutilation (FGM)

For the purposes of this policy, “**FGM**” is defined as all procedures involving the 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.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The academy's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **N.B.** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of “**honour-based’ abuse (HBA)**”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

15. Forced marriage

For the purposes of this policy, a “**forced marriage**” is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.
- Regularly being absent from the academy.
- Displaying a decline in punctuality.
- An obvious family history of older siblings leaving education early and marrying early. Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

16. Radicalisation

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the academy's wider safeguarding duties. The academy will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The academy will work with local safeguarding arrangements as appropriate.

The academy will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the academy will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the academy has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”. The Prevent duty will form part of the trust’s wider safeguarding obligations.

The trust’s procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in the Preventing Pupils from Radicalisation and Extremism Policy.

17. Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of ‘[Are you a young person with a family member in prison?](#)’ from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

18. Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Primary aged pupils will be provided with the booklet ‘[Going to Court](#)’ from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Secondary and post-16 aged pupils will be provided with the booklet ‘[Going to Court and being a witness](#)’ from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

19. Mental health

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

Staff will not attempt to make a diagnosis of mental health problems – the academy will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils’ experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL(s).

The academy will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

20. Peer-on-Peer Abuse

For the purposes of this policy, “**peer-on-peer abuse**” is defined as abuse between children.

The Trust has a zero-tolerance approach to abuse, including peer-on-peer abuse, as confirmed in the Child Protection and Safeguarding Policy's [statement of intent](#).

All staff will be aware that peer-on-peer abuse can occur between pupils of any age and gender, both inside and outside of the academy, as well as online. All staff will be aware of the indicators of peer-on-peer abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that peer-on-peer abuse is not occurring. All staff will speak to the DSL if they have any concerns about peer-on-peer abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Peer-on-peer abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can 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.

All staff will be clear as to the Trust's policy and procedures regarding peer-on-peer abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will be made aware of the heightened vulnerability of pupils with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume

that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The academy's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The Trust's procedures for managing allegations of peer-on-peer abuse are outlined in the Peer-on-Peer Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the Trust's Anti-Bullying Policy and Exclusion Policy, where relevant.

21. Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from the academy.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from the academy.
- Having been permanently excluded from the academy.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

22. Online safety and personal electronic devices

The academy will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The Trust will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with the Trust's Data and Cyber-security Breach Prevention and Management Plan. The trust will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online.

Further information regarding the trust's approach to online safety can be found in the Online Safety Policy.

Reviewing online safety

The trust will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the academy, in accordance with the Personal Electronic Devices Policy.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the Trust's General Data Protection Policy and Annex 3 Photography Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the principal will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "**Operating equipment**" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the academy. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

23. Sexting and the sharing of indecent images

The academy will ensure that staff are aware to treat the sharing of indecent images, including through sexting, as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sexting in the academy community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of sexting.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sexting that involves indecent images of a pupil, they will refer this to the DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Discuss this decision with the principal or member of the SLT.
- Ensure the image is, where possible, viewed by someone of the same sex as the individual depicted.
- Ensure viewing takes place on academy premises and with another member of staff present in the room – this staff member does not need to view the imagery.
- Record how and why the decision was made to view the imagery in accordance with the Records Management Policy.

Where the incident is categorised as 'aggravated', the situation will be managed in line with the trust's Peer-on-Peer Abuse Policy. Where the incident is categorised as 'experimental', the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL escalates the incident to CSCS. Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

24. Context of safeguarding incidents

Safeguarding incidents can occur outside of the academy and can be associated with outside factors. All staff, particularly the DSL and deputy DSL(s), will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The academy will provide as much contextual information as possible when making referrals to CSCS.

25. Pupils potentially at greater risk of harm

The academy recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the academy will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from the academy for EHE, the academy, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Looked After Children (LAC) and Previously Looked After Children (PLAC)

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The Board of Trustees will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the trust's LAC Policy.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
 - Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
 - Communication barriers may exist, as well as difficulties in overcoming these barriers
- When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the academy SENDCo, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

26. Use of the Trust premises for non-academy activities

Where the Board of Trustees hires or rents out trust facilities or premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

Where the Board of Trustees provides the activities under the direct supervision or management of trust staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the Board of Trustees will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The Board of Trustees will also ensure that there are arrangements in place to liaise with the academy on these matters where appropriate. The Board of Trustees will ensure safeguarding requirements are included in any transfer of control agreement, e.g. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the Trust to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

27. Alternative provision

The academy will remain responsible for a pupil's welfare during their time at an alternative provider.

When placing a pupil with an alternative provider, the academy will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. Each Academy will ensure it follows its own process for regular and effective checks regarding the academic, social and emotional outcomes of the pupil attending the alternative provision.

28. Work experience

When a pupil is sent on work experience, the academy will ensure that the provider has appropriate safeguarding policies and procedures in place. Please see the Trust's Careers, Education, Information and Guidance Policy.

29. Homestay exchange visits

Academy-arranged homestays in UK

Where the academy is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the academy is the regulated activity provider; therefore, the academy will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, the academy will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the academy will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

Academy-arranged homestays abroad

The academy will liaise with partner schools to discuss and agree the arrangements in place for the visit. The academy will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. The academy will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Privately-arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement and the academy is not the regulated activity provider.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the academy becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

30. Concerns about pupils

If a member of staff has any concern about a pupil's welfare, they will act on them immediately by speaking to the DSL or deputy DSL(s). All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the communication and confidentiality section of this policy.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL(s) with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely on CPOM's.

If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the academy will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

31. Managing referrals

The reporting and referral process outlined in [Appendix B](#) will be followed accordingly.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the academy does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The academy will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the academy will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the academy agrees with this decision, the academy will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The academy will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-academy interventions, is effectively supported, and knows where they can access additional support.

32. Concerns about staff members and safeguarding practices

If a staff member has concerns about another member of staff, they will be raised with the Principal.

If the concern is with regards to the principal, it will be referred to the chair of the education standards committee and the CEO.

If the concern is with regards to the CEO, it will be referred to the Chair of the Trustees.

Any concerns regarding the safeguarding practices at the academy will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.

If a staff member feels unable to raise an issue with the SLT or via the procedures set out in the Whistleblowing Policy, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

Any allegations of abuse made against staff members will be dealt with in accordance with the Trust's Managing Allegations against Staff Policy.

33. Dealing with allegations of abuse against staff

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the Trust's Allegations of Abuse Against Staff Policy – a copy of which will be provided to, and understood by, all staff. The academy will ensure all allegations against staff, including those who are not employees of the Trust, are dealt with appropriately and that the academy liaises with the relevant parties.

When managing allegations against staff, the academy will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”, as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

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

The Trust has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual.
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence.
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The DBS will consider whether to bar the person.

Referrals should be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned.

34. Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with Trust data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the academy will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the academy will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the academy will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the academy, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

35. Safer recruitment

The Trust's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the academy at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The Board of Trustees will ensure the appropriate pre-employment checks are conducted for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the declaration form provided in the appendices of this policy confirming that they are not disqualified from working in a school environment. A disqualified person will not be permitted to continue working at the trust, unless they apply for and are granted a waiver from Ofsted. The trust will provide support with this process.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The trust will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

36. Single central record (SCR)

The trust keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at each academy.

All members of the proprietor body are also recorded on the SCR.

The Trust holds a central SCR containing information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR:

- An identity check.
- A barred list check.
- An enhanced DBS check.
- A prohibition from teaching check.
- A check of professional qualifications, where required.
- A check to determine the individual's right to work in the UK.
- Additional checks for those who have lived or worked outside of the UK.
- Whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18.
- A section 128 check for those in management positions.

For agency and third-party supply staff, the trust will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The trust is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work for the trust.

37. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on an annual basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.

- The Peer-on-Peer Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- The Children Missing Education Policy, including the safeguarding response to children who go missing from education.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSL(s).

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the academy.

The DSL and deputy DSL(s) will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSL(s) will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

38. Monitoring and review

This policy is reviewed at least annually. This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff and those responsible for governance. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is September 2022.

39. Public Sector Equality Duty (Equality Act 2010)

In preparing or amending this policy, the author has given due regard to the Public Sector Equality Duty; that is, they have considered any potential impact on people who share certain protected characteristics. These protected characteristics are defined as: race, disability, sex, age, religion or belief, sexual orientation, pregnancy and maternity and gender reassignment.

Appendix a - Staff Disqualification Declaration

Name of academy:	
Name of staff member:	Position:
Orders and other restrictions	
Circle one option	
Have any orders or other determinations related to childcare been made in respect of you?	Yes/No
Have any orders or other determinations related to childcare been made in respect of a child in your care?	Yes/No
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	Yes/No
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) Regulations 2009?	Yes/No
Are you barred from working with children by the DBS?	Yes/No
Are you prohibited from teaching?	Yes/No
Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
• Any offence against or involving a child (person under the age of 18)?	Yes/No
• Any violent or sexual offence against an adult?	Yes/No
• Any offence under The Sexual Offences Act 2003?	Yes/No
• Any other relevant offence?	Yes/No
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?	Yes/No
Disqualification by association	
To the best of your knowledge, is anyone in your household disqualified from working with children under the regulations? This includes the person having an Order of Restriction, as outlined in the 'Orders and other restrictions' section, against them or having been cautioned, reprimanded, given a warning for or convicted of any offence in the 'Specified and statutory offences' section.	Yes/No
Provision of information	
If you have answered yes to any of the questions above, provide details below in respect of yourself, or, where relevant, the member of your household concerned. You may provide this information separately, but you must do so without delay.	
Details of the order restriction, conviction or caution:	
The date(s) of the above:	
The relevant court(s) or body/bodies:	
You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions/convictions, a DBS Certificate may be provided.	
Declaration	
In signing this form, I confirm that the information provided is true to the best of my knowledge and that:	
<ul style="list-style-type: none"> • I understand my responsibilities to safeguard children. • I understand that I must notify my principal immediately of anything that affects my suitability to work within the academy. This includes any cautions, warnings, convictions, orders or other 	

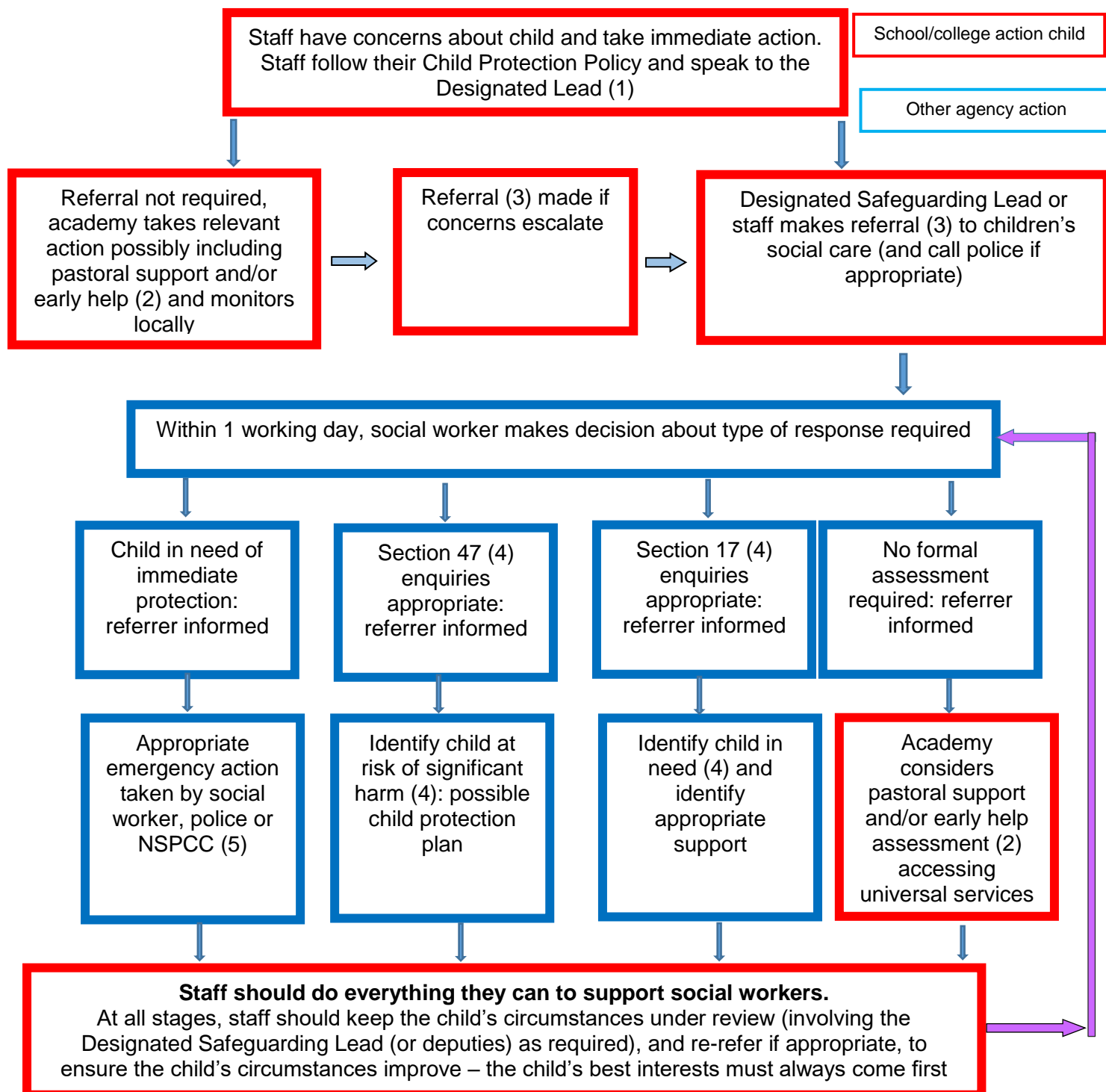
determinations made in respect of me or a member of my household that would render me disqualified from working with children.	
Signed:	
Print name:	
Date:	

Appendix b – Referral Process

Actions where there are concerns about a child

From KCSIE 2021 page 23

The actions taken by the academy are outlined in red, whereas actions taken by another agency are outlined in blue.



1. In cases which also involve a concern or allegation of abuse against a staff member, see Part Four of [KCSIE 2021](#)
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency

assessment should be arranged. Chapter One of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#)
4. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter One of [Working Together to Safeguard Children](#)
5. This could include applying for an Emergency Protection Order (EPO)

**Appendix c - Guidance/Supervision/Support Policy
(For staff working with safeguarding issues in academies.)**

Definition of supervision and mentoring

Supervision can mean different things to different people but essentially it is an activity that brings skilled supervisors and practitioners together in order to reflect upon their practice. "Supervision aims to identify solutions to problems, improve practice and increase understanding of professional issues" UKCC (1996).

Mentoring can be defined as: 'An experienced person in a company or educational institution who trains and supports new employees or pupils'.

The document, 'Working Together to Safeguard Children' (2015) states; organisations should provide "appropriate supervision and support for staff, including undertaking safeguarding training."

There are various models or approaches to supervision and mentoring; one-to-one, group, or peer supervision. The choice of approach will depend upon a number of factors, including personal choice, access to support, length of experience, qualifications, availability of groups etc.

Purpose

- Review workloads, if needed
- A place where a member of staff can be challenged supportively and constructively within mutually agreed and accepted boundaries
- Issues relating to the work place and to working practices can be identified and discussed
- Achievements are identified and celebrated
- Emotional well-being/work life balance is considered
- A place to offload

Structure

Supervision in the academy may be offered both internally and /or externally.

Internal supervision – Ideally, safeguarding supervision should always be carried out by the named Designated Safeguarding Lead for child protection (DSL) in the academy, but in larger academies this may need to be delegated to other key staff with safeguarding responsibilities, such as Year Heads or Pastoral Leaders. Supervision for the DSL should be carried out by the Principal, or where the DSL is the Principal, the Safeguarding ESC link or a colleague Principal.

Supervision should be undertaken with designated staff responsible for or working with identified vulnerable children and/or their families. It should include all staff working with children who are subject to a child protection or child in need plan, children with social care involvement, children looked after (LAC) and children subject to an Early Help Assessment.

Who might need safeguarding supervision	Who might provide safeguarding supervision
Designated Safeguarding Lead (DSL)	Principal, DDSL, colleague Principal, safeguarding ESC link, vicar
Deputy Designated Safeguarding Lead (DDSL)	DSL, Principal
Year Heads	DSL, DDSL, Principal
Pastoral Leads	DSL, DDSL, Principal
SENCO/LAC Co-ordinator	DSL, DDSL, Principal
Class teachers	DSL, DDSL, Year Heads, Pastoral Leads
Teaching Assistants	DSL, DDSL, Year Heads, Pastoral Leads

Family Support Workers	DSL, DDSL, Pastoral Leads, Line Manager
Attendance Officers	DSL, DDSL, Pastoral Leads, Line Manager
Other specialist support workers	DSL, Pastoral Leads, Line Manager, professional body

External supervision – this will be peer to peer supervision from a colleague in another academy, network or other agreed supportive structure. This should be undertaken with lead professional to lead professional but academies could extend the arrangement if they wished to secure extended external engagement.

If the Principal is not directly involved in the supervision then they should assure themselves that the process is robust and be in a position to report, in general terms, on the effectiveness of the process to their Education Standards Committee.

The structure of the supervision arrangements should be clear and reported to the ESC.

Support will also be available for ALL staff at any time the need may arise; this could be informal and incidental supervision. Referrals to Occupational Health for further counselling and support can be made upon request.

Supervision methods

This policy is concerned primarily with one to one supervision that takes place in private at a pre-arranged time with an agreed agenda and preparation on behalf of both parties. All staff within the organisation that have responsibility for safeguarding children (as identified above) will have access to this method of supervision.

It is recognised, however, that supervision is an on-going process that takes place in other ways. The two other main methods are outlined below. They have a place but should not replace planned, formal, recorded, one to one sessions.

Group safeguarding supervision

In some cases, it may be necessary to conduct a group safeguarding supervision. This is a session where there may be several staff involved in direct child protection/safeguarding work with a specific child/ family. There are many benefits to be gained from group supervision including problem solving, peer group learning and giving and receiving strong feedback within a supportive setting.

In group supervision the roles and responsibilities of the supervisor and supervisees should be the same with the added principles:

- The group should clarify and agree the boundaries of confidentiality
- The records should reflect that this was a group supervision

Unplanned or “ad-hoc” supervision

The pace of work and change and the frequency of supervision means that staff often have to 'check something out' with a supervisor, obtain a decision or gain permission to do something in between formal supervision sessions. In addition, staff who work in academies where there are a lot of child protection concerns will be working closely with their supervisor and often communicating daily about thresholds, decision making, disagreements between agencies etc.

This form of supervision is a normal and acceptable part of the staff/supervisor relationship. However, the following points should be borne in mind when considering unplanned or ad-hoc supervision:

- any decisions made with regard to a child or family should be clearly recorded on the child's records as appropriate.
- where supervisees and supervisors work closely together this does not negate the need for private one to one time together on a regular basis. The focus of these sessions is wholly on the individual, their development, performance and any issues arising from their work that do not arise on a day-to-day basis.

Practicalities

- Frequency and length - these meeting should take place at least once a half term.
- Supervision should take place in a private and uninterrupted space during the working day.
- Recording supervision – It is the supervisor’s responsibility to take notes and make sure they are copied, circulated and filed. Both parties need to agree and sign that they are accurate. Records must be kept in a secure location. The records themselves must be kept in a format that suits both parties however a summary sheet of actions will be completed during or immediately after the session.
- Should the supervisor leave then the replacement would have access to the previous six months' records.

Entitlement

It is important that safeguarding supervision is provided. If an individual is not receiving safeguarding supervision at the required frequency during the year they should: -

- In the first instance supervisees should always discuss any complaints or dissatisfaction with their supervisor and endeavour to reach an agreement within the normal supervision process;
- If a solution is not agreed the supervisee should raise the issue with the supervisor's manager (i.e. Headteacher, Safeguarding ESC link or Chair of the ESC).

Confidentiality

There will be three levels relating to the need to breach confidentiality within supervision as set out below, this is provided so that all individuals receiving supervision within their employment are clear about what can and cannot remain confidential to supervision.

Issue	Response
Behaviour or activities which bring the Trust into disrepute. Harm to self or others Illegal activity Actions of gross Misconduct Activities where child protection and vulnerable adults policies apply	There is a duty as an employee to report/action through the appropriate channels.
Activities that may lead to disciplinary action being taken Actions relating to performance and capability regarding putting children's safety at risk	Items would need to be reported via line management structures
The information given by the supervisee will have significant impact on the organisation	Items may need to be reported via line management structures.

Starting supervision

- Signing Contracts - By the end of the *THIRD* session it is expected that a supervision contract has been discussed by both parties, signed and copied to the file (sample attached)
- Preparing for supervision – Both parties should prepare themselves for the meeting including: -

Review previous notes and agreed actions – ongoing between sessions
 Hold any preparatory discussions if needed, to ensure the meeting has maximum impact.
 Alert each other if there are new big agenda items.

Guidance notes

Each person in supervision will have their own style and approach: however, the following agenda is provided as a checklist to ensure that all core items are covered.

- Welcome and informal opener
- Setting agenda – both parties to input
- General offload and information sharing
- Review notes and agreed actions from previous meeting.
- Specific case load issues discussed.
- Problem solving and finding solutions
- Recognise and celebrate achievement
- Job related resource and support needs
- AOB

Working guidelines for Good Practice

Creating the right environment is an important element but we must accept that this is not always possible within academy, however we should strive to:

- Have a quiet private space to allow for open discussion,
- Ensure a relaxed atmosphere possibly with refreshments,
- Try to avoid telephone interruptions,
- Prioritise this time and avoid interruptions,
- Make sure you keep to agreed starting and stopping times
- Consider the time of day supervision is scheduled
- Where appropriate, refer to the Trust's Lone Worker Policy

Supervision Contract

Frequency and length: Each half term or sooner if required on request

Creating the agenda:

How will we plan for the supervision?

What I expect from supervision?

If there are difficulties with supervision we will move forward by

Records of the sessions will be kept securely by the Principal or Designated Safeguarding Lead

Supervisor

Signed

Date

Supervisee

Signed

Date

Agenda

Date

Time

Supervisor

Supervisee

- Welcome and informal opener
- Setting agenda – both parties to input
- General offload and information sharing
- Review notes and agreed actions from previous meeting.
- Specific case load issues discussed.
- Problem solving and finding solutions
- Recognise and celebrate achievement
- Job related resource and support needs
- Any Other Business
- Date of Next Meeting

Actions from Supervision

Date	Action	Person	Notes

Appendix d - Contacts and Advice

Expert organisations

- Barnardo's
- Lucy Faithfull Foundation
- NSPCC
- Rape Crisis
- University of Bedfordshire: Contextual Safeguarding
- UK Safer Internet Centre

Support for victims

- Anti-Bullying Alliance
- MoJ Victim Support
- Rape Crisis
- The Survivor's Trust
- Victim Support

Toolkits

- Brook
- NSPCC
- Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire

Further information on confidentiality and information sharing

- Gillick Competency Fraser Guidelines
- Government Information Sharing Advice
- Information Commissioner's Office: Education
- NSPCC: Things to Know and Consider

Further information on sexting

- UK Council for Child Internet Safety: Sexting Advice
- London Grid for Learning – Collection of Advice

Support for parents

- Parentzone
- Parentsafe – London Grid for Learning
- CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact
- CEOP Thinkuknow – Supporting Positive Sexual Behaviour