



# Child Protection and Safeguarding Policy

<b>Approved by:</b>	DfE	<b>Date:</b> June 2022
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	Executive Leadership Team / LSB	<b>Date:</b> TBC
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<b>Last reviewed on:</b>	October 2022
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<b>Next review due by:</b>	September 2023
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<b>Person responsible for the policy</b>	Ali Bellaby (Headteacher)
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## Important contacts

At The Keystone Academy the named personnel with designated responsibility for Child Protection and Safeguarding are:

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Headteacher	Ali Bellaby	07706 323959
Designated safeguarding lead (DSL)	Liz Heynen	07761 510969
Deputy DSL	TBC	
Designated staff member for Looked After Children (LAC)	Liz Heynen	

The named personnel with designated responsibility regarding allegations against staff/those working in the school are:

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Headteacher	Ali Bellaby	07706 323959
Chair of LSB (in the event of an allegation against the Headteacher)	Tony Smith	

The named contacts within Shropshire Local Authority with responsibility for key aspects of Child Protection and Safeguarding are:

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Shropshire local authority designated officer (LADO) First Point of Contact (FPOC)	<i>All allegations that meet the criteria must be reported to the LADO by contacting the FPOC</i>	03456 789021
West Mercia Prevent Team	Sgt Calum Forsyth DC Holly Aungiers	07970 047227 01386 591815 Prevent@westmercia.pnn.police.uk

## 1. INTRODUCTION

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all practitioners in this school make sure their approach is child-centred. This means that we consider, at all times, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Through our day-to-day contact with students and direct work with families, staff take notice of indicators of possible abuse or neglect and consult with Children's Services in Shropshire. We recognise that we form part of the wider safeguarding system for children. This responsibility also means that we are aware of the behaviour of staff in the school. We maintain an attitude of '*it could happen here*' where safeguarding is concerned.

In our school we ensure that:

- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity are treated equally and have equal rights to protection
- All staff act on concerns or disclosures that may suggest a child is at risk of harm
- Children and staff involved in safeguarding issues receive appropriate support
- Staff adhere to a Code of Conduct and Staff Handbook
- All staff are aware of Early Help procedures and ensure that relevant assessments and referrals take place
- All staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They recognise that, in most cases, multiple issues will overlap with one another.
- Adults understand that children's poor behaviour may be a sign they are suffering harm or that they have been traumatised by abuse

## 2. LEGISLATION AND STATUTORY GUIDANCE

This policy demonstrates the school's commitment and compliance with safeguarding legislation. It is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), [Framework for the Early Years Foundation Stage \(2021\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children

Our locally agreed multi-agency safeguarding arrangements in Shropshire are called Shropshire Safeguarding Community Partnership (SSCP). Our local procedures are detailed within this policy.

### 3. **AIMS**

The academy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

#### 4. SCOPE OF THIS POLICY

This policy applies to all members of the school community (including staff, students, volunteers, parents/carers, visitors, agency staff or anyone working on behalf of The Keystone Academy.

#### 5. DEFINITIONS

**Safeguarding and promoting the welfare of children:** refers to the process of protecting children from maltreatment, preventing the impairment of children's mental and physical health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes and life chances.

**Early Help:** means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

**Child Protection:** refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Abuse:** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. *Appendix 3* explains the different types of abuse.

**Neglect:** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. *Appendix 3* defines neglect in more detail.

**Staff:** refers to all those working for or on behalf of the school/education setting in either a paid or voluntary capacity, full-time or part-time. This also includes parents and Associates of the Board.

**Child:** refers to all children who have not yet reached the age of 18. On the whole, this will apply to students from our own school. However, the policy will extend to visiting children from other establishments.

**Parent:** refers to birth parents and other adults who are in a parenting role e.g. carers, step-parents, foster parents and adoptive parents.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

## 6. EQUALITY STATEMENT

All children have the right to live without being abused, or live in the fear of being abused. Here within The Keystone Academy, we firmly believe that our children matter and it is our responsibility to protect any child in our care who we know to be at risk of being abused, or who has been abused.

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 7. PREVENTION

Children feel secure in a safe environment in which they can learn and develop. Staff see this as a priority and ensure school provides a safe base both physically and psychologically. This is achieved through quality relationships and the details from within the taught and hidden curriculums. Our PSHE and RSE curriculums in particular support the teaching of key responsibilities, aspects of citizenship and how to be safe.

Some of the key preventative work with students focuses on:

- Attitudes and responsibilities in adulthood; skills needed to keep themselves safe, including understanding and recognition of healthy/unhealthy relationships and support available
- Recognising and managing risks in different situations, including on the internet and judging what kind of physical contact is acceptable and unacceptable
- Clear guidance for the use of mobile technology in and out of school, raising awareness of potential risks in relation to safeguarding
- Support for children in custody and their resettlement back into the school community as part of our inclusive approach
- Student voice opportunities invite debate regarding safeguarding issues, to support continual reflection and review of systems and support.

Wider preventative approaches include:

- Clear procedures and training to support all adults to pose safeguarding questions with "respectful uncertainty" as part of their shared responsibility to safeguard children
- Emerging safeguarding themes are proactively addressed and communicated to the local authority, ensuring a coherent approach for multi-agency working
- Systematic monitoring of student welfare, keeping accurate records, speaking to parents and notifying appropriate agencies when necessary
- Appropriate information sharing with key staff about individuals who are more vulnerable to abuse and /or less able to easily access services due to their personal risk factors. This ensures a proactive approach to recognising and identifying safeguarding concerns.

## 8. ROLES AND RESPONSIBILITIES

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, governors and Trustees in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

### 8.1 All staff

All staff will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed and understood the guidance.



All staff will be aware of:

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

Section 20 and Appendix 6 of this policy outline in more detail how staff are supported to do this.

## 8.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Liz Heynen, Pastoral Lead. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

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

The DSL can be contacted out of school hours when necessary either by email ([e.heynen@thekeystoneacademy.org](mailto:e.heynen@thekeystoneacademy.org)) or by mobile (07761510969).

The Deputy DSL - (TBC) will act as cover for the DSL and is on hand alongside the DSL for any safeguarding queries throughout the school day.

If the DSL and Deputy DSL are not available, Ali Bellaby, Headteacher will act as cover (for example, during out-of-hours/out-of-term activities).

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

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

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

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

The full responsibilities of the DSL and deputy are set out in their job description.

### **8.3 The Local Support Board (LSB)**

The LSB will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

The chair of the LSB will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see Appendix 8).

All LSB members will read Keeping Children Safe in Education in its entirety.

Section 20 of this policy has information on how governors are supported to fulfil their role.

### **8.4 The headteacher**

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

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see *Appendix 8*)
- Ensuring the relevant staffing ratios are met, where applicable

## 9. CONFIDENTIALITY

At Keystone Academy we take seriously the importance of confidentiality and data protection with respect to safeguarding. We ensure that all information is held and used securely, in line with our Data Protection policy. However, it is very clear that the Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. As such, staff understand and work together to ensure the following principles and practices are taken into consideration:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and supports staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 19, and allegations of abuse against staff in *Appendix 8*

## 10. SAFEGUARDING PROCEDURES – LOCAL THRESHOLDS

We take a holistic approach to safeguarding all children in our care and recognise that different families need a different level of support at different times. To enable us to recognise at which level a family might require support; we use the Shropshire Safeguarding Community Partnership Multi-Agency Guidance on Threshold Criteria to help support Children, Young People and their Families in Shropshire. [Shropshire Threshold Document](#).

This guidance identifies four levels to ensure all children receive the support and intervention they need to achieve a positive life experience. Of central importance in understanding where a child's needs might lie on this continuum, is the cooperation and engagement of parents and carers and we aim to develop good, professional relationships to ensure that we have a shared understanding of each child's needs.

It should be noted that if parents demonstrate a lack of co-operation or appreciation about the concerns we identify, this may raise the level of the need and required level of action.

At Keystone Academy, we actively support multi-agency planning for children that require it and, in doing so, provide information from the child's point of view, bringing their lived experience to life as evidenced by observations or information provided. Staff know how to pass on any concerns no matter how trivial they seem.

Staff members always act in the interests of the child and are aware of their responsibility to take action as outlined in this policy. Staff are aware that they must be prepared to identify those children who may benefit from early help or targeted support.

### **Level 1 – Universal**

Children with no additional needs and where there are no concerns. Typically, these children are likely to live in a resilient and protective environment where their needs are met. These children will require no additional support beyond that which is universally available.

We follow the Statutory Framework for the Early Years Foundation Stage 2021 to provide individual support for all children in Reception. Each child is allocated a key person who will make a relationship both with the child and his or her family. The key person will make observations and keep records to ensure there are no barriers to a child's learning and establish stable and affectionate relationships.

It is Universal Services who are best placed to ensure children and families have access to the Early Help Offer, if required.

### **Level 2 – Children in need of Early Help**

These children can be defined as needing some additional support without which they would be at risk of not meeting their full potential. Their identified needs may relate to their health, educational, or social development, and are likely to be short term needs. If ignored these issues may develop into more worrying concerns for the child.

Early Help aims to provide a multi-agency response when a single agency is not able to progress and help the child and their family. The existing single agency or multi-agency team should work with the family and each other to complete a Whole Family Assessment and Action Plan. Consent must be sought to access services.

The staff at Keystone Academy are alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs

- Has Special Educational Needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is a privately fostered child

If there are concerns about a child's welfare that do not meet the thresholds of child abuse, the school will consider whether the Early Help approach should be considered. Staff are aware that early identification of concerns and the use of Early Help to develop a multi-agency plan for the child can reduce the risk of subsequent abuse.

### **Level 3 – Targeted Early Help**

This level applies to those children identified as requiring targeted support and who meet at least 2 of the 6 Strengthening Families criteria in the Whole Family Assessment. It is likely that for these children their needs and care are compromised. These children will be those who are vulnerable to harm or experiencing adversity. In addition to the Whole Family Assessment, specific local tools and pathways should be used where there are concerns about possible harm to the child.

These children are potentially at risk of developing acute / complex needs if they do not receive targeted early help. If a child continues to have unmet needs which cannot be met by Universal or Early Help support, then the existing single agency or multi-agency team should work with the family and each other to review the Whole Family Assessment and Action Plan and follow the Request for Intervention Pathway to request more intensive family support from a Targeted Early Help Family Support Worker.

### **Level 4 – Complex Significant Needs**

These are children whose needs and care at the present time are likely to be significantly compromised and / or they are suffering or likely to suffer significant harm, requiring intervention from Shropshire Council Children's Social Care.

An immediate referral to Compass should be made for assessment under Section 17 or Section 47 of the Children Act 1989.

Specific local tools and pathways and the Shropshire Threshold Matrix should be used to support any referral and help practitioners to assess significant harm to the child.

### Child in Need

Section 17 of the Children Act (1989) states that a child shall be considered in need if:

- They are unlikely to achieve, maintain or have the opportunity of achieving or maintaining a reasonable standard of health or development without the provision of services by a local authority.
- Their health and development is likely to be significantly impaired, or further impaired, without the provisions of such services
- They are disabled.

### Child Protection

Section 47 of the Children Act 1989 states that the authority shall make necessary enquiries to enable them to decide whether they should take action to safeguard or promote the child's welfare where there is reasonable cause to suspect a child is suffering or likely to suffer significant harm.

Where it is suspected that a child may be suffering or be at risk of suffering significant harm; referring practitioners must inform parents or carers that they are making a referral to Compass, and seek consent unless to do so may:

- Place the child at increased risk of significant harm; or
- Place any other person at risk of injury; or
- Obstruct or interfere with any potential Police investigation; or
- Lead to unjustified delay in making enquiries about allegations of significant harm.

## **11. RECOGNISING ABUSE AND TAKING ACTION**

In Keystone Academy we follow the local procedures for making a referral as set out by the Shropshire Safeguarding Community Partnership (SSCP) and take account of guidance issued by the Department for Education.

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

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

Where a member of staff is concerned that a child is in immediate danger or at risk of harm, they should report this to the DSL or their Deputy **without delay**. In the absence of the DSL, they should report concerns to the Headteacher.

A referral to children's social care and/or the police must happen **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral** but at Keystone Academy the DSL will support anyone



to do this effectively and efficiently. In the absence of the DSL, the referral should be made immediately by the staff member raising the concern.

Tell the DSL as soon as possible if you make a referral directly.

### **11.2 If a child makes a disclosure to you**

If a child discloses a safeguarding issue to you, you should:

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

Staff are aware that they should not question the child other than to respond with **TED**: **T**ell me what you mean by that, **E**xplain what you mean by that, **D**escribe that. Staff will observe and listen, but will not probe/ask any leading questions.

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in *Appendix 6* of this policy.

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act

was necessary for the girl's physical or mental health or for purposes connected with labour or birth

must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

Follow procedures detailed in section 11.

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

Figure 1 below, before section 11.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action. In their absence, speak with the Headteacher.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the [NSPCC helpline on 0800 800 5000](https://www.nspcc.org.uk/08008005000). Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

#### **Early Help**

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

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



See Shropshire Safeguarding Community Partnership for referral procedures.

**Referral**

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

If you make a referral directly, you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

See section 11 for referral procedures. The DSL will support escalation by liaising with social care team managers.

**11.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL or Deputy DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The contact details for support:

<b>West Mercia Prevent Team</b>	07970 047227 01386 591815 Prevent@westmercia.pnn.police.uk
<b>Police Prevent Team</b>	101 ask for Prevent

<p><b>Department for Education dedicated helpline</b></p> <p>This can be used by school staff and governors to raise concerns about extremism with respect to a pupil</p>	<p>020 7340 7264</p> <p><a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a></p> <p>Note that this is not for use in emergency situations.</p>
<p><b>In an emergency, if you:</b></p> <ul style="list-style-type: none"> <li>● Think someone is in immediate danger</li> <li>● Think someone may be planning to travel to join an extremist group</li> <li>● See or hear something that may be terrorist-related</li> </ul>	<p>999</p> <p>Confidential anti-terrorist hotline</p> <p>0800 789 321</p>

### 11.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

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

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

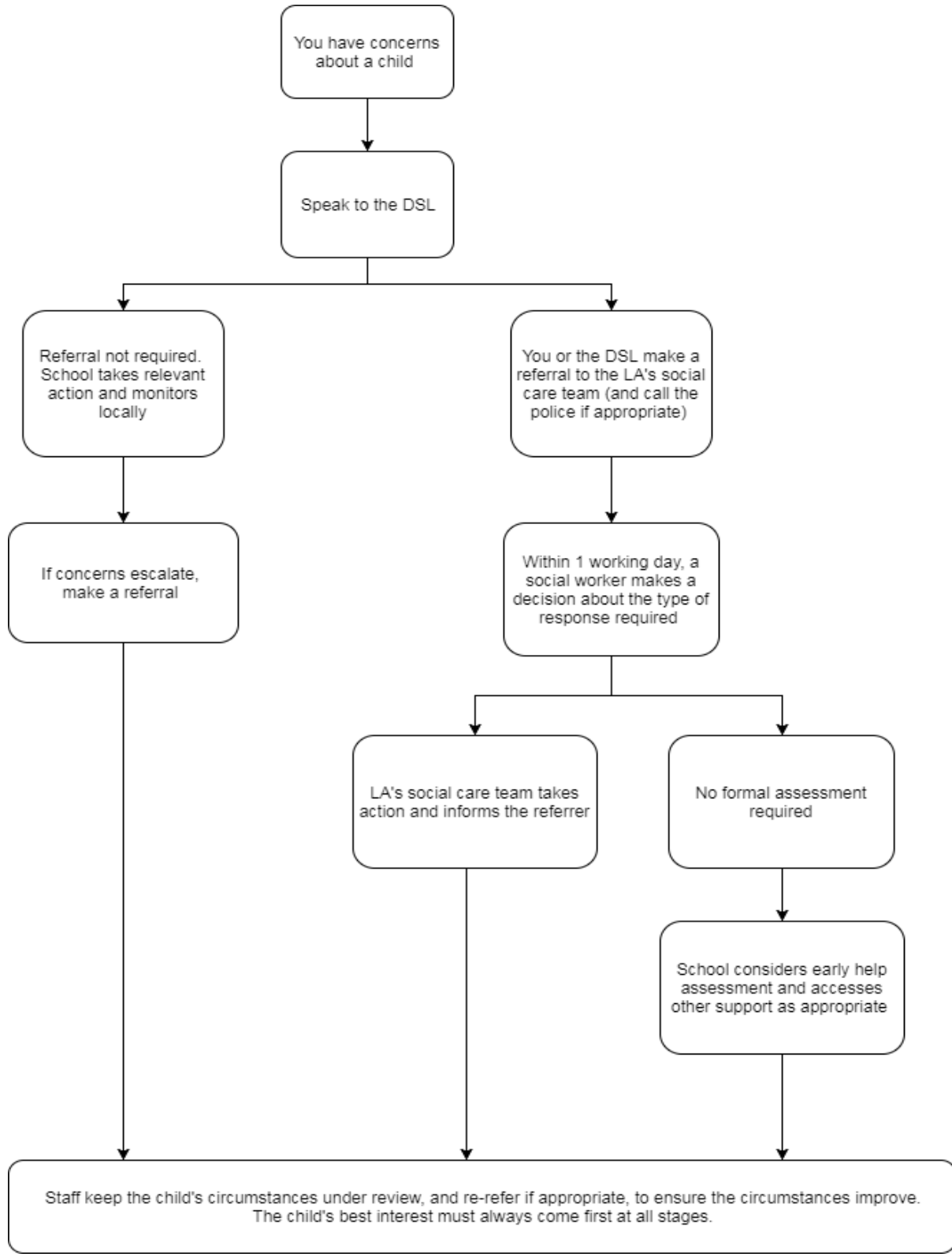
At Keystone Academy, we have:

- Trained Mental Health First Aiders who provide a first response to mental health needs
- Trained counsellors – pupils can be referred to this support by the Pastoral Lead.

Our Mental Health First Aiders are: Ali Bellaby, Liz Heynen, Ben Garton

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

(Note – if the DSL is unavailable, this should not delay action. See section 11.4 for what to do.)



### **11.7 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of the LSB.

The headteacher/chair of the LSB will then follow the procedures set out in *Appendix 8*, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

The LADO contact details: 03456 789021

### **11.8 Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

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

Most cases of pupils hurting other pupils will be dealt with under our school's Behaviour Regulation policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See *Appendix 6* for more information about child-on-child abuse.

### **Procedures for dealing with allegations of child-on-child abuse**

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

- You must record the allegation and tell the DSL (or deputy DSL), but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The DSL will make a record of the concern on CPOMS, the discussion and any outcome and keep a copy in the files of both children
- If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the victim(s) and child(ren) the allegation is being made against).
- It may be appropriate to exclude the child being complained about for a period of time according to the behaviour policy and procedures.
- Where neither Social Care nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

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

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 11.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation. None of these barriers should stop staff from having a "professional curiosity" and speaking to the DSL
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

### **11.9 Sharing of nudes and semi-nudes ('sexting')**

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

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL (or deputy DSL) immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL immediately).
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

#### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the

incident and the DSL / Deputy DSL. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

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

### **Informing parents/carers**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialling 101.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 19 of this policy also apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education curriculum. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

### **11.10 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.



To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Ensure all staff are trained and available to listen to pupils if they have a concern they'd like to share.
- Ensure posters are displayed throughout all sites, to promote the Pastoral Lead and how they can help, including reporting any concerns they may have to them.
- Ensure pupils are made aware of the reporting systems and processes through discussion in our relationships and sex education curriculum
- Provide support and reassurance to pupils following disclosures

## 12. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### The 4 key categories of risk

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

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

non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

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

For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy.

### 13. NOTIFYING PARENTS OR CARERS

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

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

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

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

### 14. PUPILS WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

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

- Pastoral team acting as key workers for key individuals and their families, enabling a good knowledge of the individual's needs and how best to understand and support them.
- Tailored support plans are created for individuals who need it. These can include 1:1 activities, therapeutic interventions such as counselling, use of our sensory room.
- All staff are trained strategies to support children with speech, language and communication needs (SLCN). Children with SLCN may be supported with visual strategies (such as drawing) to help them communicate their worries and concerns.

### 15. PUPILS WITH A SOCIAL WORKER

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The Pastoral Leads, DSL, deputy DSL and all other members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the Pastoral Leads, DSL / deputy DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

## **16. LOOKED-AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN**

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

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

Our appointed designated person, Liz Heynen, is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated person will:

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

## **17. THE USE OF 'REASONABLE FORCE'**

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. All staff receive annual training on Physical Intervention methods and understand that their priority is de-escalation. Reasonable force is only ever used as a last resort in order to keep the students safe. For further information please see '[Safe Touch Policy](#)' on the school's website.

## **18. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES**

### **18.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 9).

### **18.2 Other complaints**

Complaints relating to pupils will be dealt with following procedures in accordance with our complaints policy, behaviour policy and anti-bullying policies (see section 11.8 and Appendix 6, on child on child abuse for more information).

Complaints relating to safeguarding concerns about the premises will be dealt with in accordance with the complaints procedure. In the first instance complaints should be brought to the attention of the Headteacher.

### **18.3 Whistle-blowing**

We have a separate whistle-blowing policy which details staff responsibilities, processes and procedures that staff should follow, if they have a concern about any aspect of the school's activities or those who work for the school. This includes concerns of a safeguarding nature such as how Keystone Academy safeguards pupils, including poor or unsafe practice or potential failures. Staff should refer to this policy for further information.

## **19. RECORD KEEPING**

Keystone Academy holds records in line with our records retention schedule.

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

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child, held electronically on CPOMS. Access is restricted and monitored by the Headteacher, DSL and the Deputy DSL. Hard copies of records or reports relating to Safeguarding and Child Protection concerns are kept in a separate, confidential file, securely stored away from the main student file. Authorisation to access these records is controlled by the Headteacher and DSL.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. This will either be via CPOMS or in the student's CONFIDENTIAL folder on Sharepoint.

Safeguarding records relating to individual children will be retained for after they have left the school until they are 75 years of age.

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Keystone Academy works closely with partner agencies supporting the safeguarding and welfare of young people across Shropshire. In line with local arrangements, important safeguarding information is shared in a timely manner when a child is believed to be at risk of harm.

We participate in West Mercia Constabulary's Operation Encompass which shares information to the school whenever the police have attended a domestic incident and one of our students has been involved or a witness. This information is recorded safely and electronically on CPOMS.

In addition:

- *Appendix 8* sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- *Appendix 8* sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 20. TRAINING

### 20.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

The Pastoral Lead receives regular additional targeted training on issues relating to the complex safeguarding needs of our pupils, (e.g. contextual safeguarding, domestic abuse, neglect, CSE, CCE). In addition these staff are regularly updated on the local procedures and agencies available for support, ensuring they always have the most current information.

The school acknowledges serious case review findings and shares lessons learned with all staff to ensure no child falls through the gaps.

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

Volunteers will receive appropriate training, if applicable.

### 20.2 The DSL and Deputy DSL

The DSL and Deputy DSL will undertake child protection and safeguarding training and multi-agency safeguarding at least every 2 years.



In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will attend the Designated Safeguarding Leads Meetings held each term, therefore enabling them to remain up to date with Safeguarding practices and be aware of any emerging concerns/themes within Shropshire.

They will also undertake Prevent awareness training.

### **20.3 Local Support and Scrutiny Board**

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

As the chair of the LSSB may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

### **20.4 Recruitment – interview panels**

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

See *Appendix 8* of this policy for more information about our safer recruitment procedures.

### **20.5 Staff who have contact with pupils and families**

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

## **21. MONITORING ARRANGEMENTS**

This policy will be reviewed **annually**. At every review, it will be approved by the full governing board.

## **22. LINKS WITH OTHER POLICIES**

This policy links to the following policies and procedures:

- [E-safety policy](#)
- [Social Media Policy](#)



- Staff Code of Conduct and Trust Handbook
- ["Preventing and Tackling Bullying" DfE July 2017](#)
- [Mobile Phone Policy](#)
- Behaviour Regulation Policy
- Anti-Bullying Policy
- [School Mental Health and wellbeing Policy](#)
- [Self – Harm Pathway; A Guide for School Staff.](#)
- [Suicide Prevention: Policy and Strategy. October 2019](#)
- Computer and network acceptable use
- Complaints
- Health and safety
- Attendance
- Online safety
- Work mobile phone use
- Equality
- Relationships and sex education
- Whistleblowing



## Staying Safe

<b>Designated Safeguarding Lead</b>	<b>Liz Heynen</b>
<b>Deputy Safeguarding Lead</b>	<b>TBA</b>
<b>Chair of the LSB</b>	<b>Tony Smith</b>
<b>Our local contact numbers are:</b>	
<b>Safeguarding of children concerns</b> ( <i>Children living in Shropshire</i> )	<b>0345 678 9021 (mon-thurs 9-5, fri 9-4)</b> <b>0345 678 9040 (out of hours)</b>
<b>Allegations against an adult working with children</b>	<b>0345 678 9021</b> <i>Local Authority Designated Officer (LADO)</i>
<b>Police</b> ( <i>Emergency</i> )	<b>999</b>
<b>Police</b> ( <i>Non Emergency</i> )	<b>101</b>

## Appendix 2

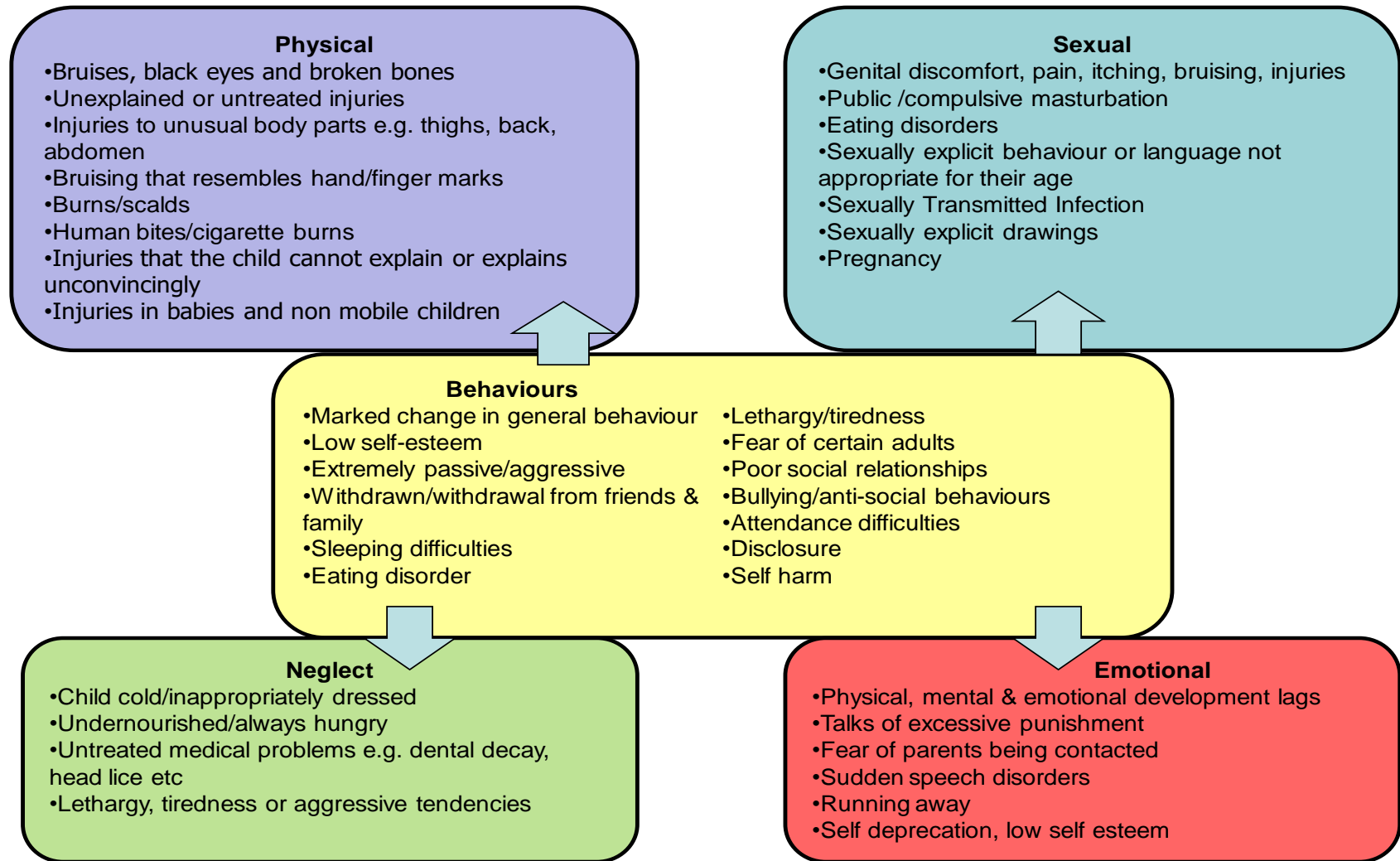


<p style="text-align: center;"><b>Universal</b></p> <p>Children whose needs are being adequately met by their family, friends and community and who are accessing universal services. (e.g. health, GP, schools)</p> <ul style="list-style-type: none"> <li>• <b>Response:</b> - Continue meeting child or young person's needs as a universal service in a safe environment. Universal services will remain at all levels of need.</li> </ul>	<p style="text-align: center;"><b>Targeted</b></p> <p>Children who would benefit from additional help with moderate difficulties in order to make the best of their life chances.</p> <ul style="list-style-type: none"> <li>• <b>Response:</b> - A practitioner who identifies unmet needs for a child or young person should consider how these needs can best be met, usually by some additional help from within their own agency. The Early Help Assessment (EHA) can help to identify and plan to meet needs and involve others where necessary.</li> </ul>
<p style="text-align: center;"><b>Complex</b></p> <p>Children who have a range of additional needs affecting different areas of their life.</p> <ul style="list-style-type: none"> <li>• <b>Response:</b> Request support from other agencies such as family support, commissioned services Youth Crime Prevention Team and Education Welfare. Agencies work together to provide a network of support to the child or young person and their family.</li> <li>• Identify a lead practitioner to co-ordinate support and be primary link with the family.</li> <li>• Hold a multi-agency meeting and use the Early Help Assessment (EHA) with child and family to assess their needs. Develop and implement an Action Plan and review progress.</li> </ul>	<p style="text-align: center;"><b>Specialist</b></p> <p>Children who need immediate protection or who require integrated support from a statutory service such as CAMHS, Children's Social Care, or Youth Offending Service.</p> <ul style="list-style-type: none"> <li>• Children's Social Care lead multi-agency planning and support through a Child-in-Need Plan, Child Protection Procedures, or accommodation by Children's Social Care.</li> <li>• Youth Offending Team lead multi-agency interventions for Court-Ordered Supervision of Young Offenders in the community and in custody.</li> </ul>

**Definitions of Abuse**  
**“Keeping Children Safe in Education” 2022**

<div style="text-align: center; margin-bottom: 10px;"><b>Sexual</b></div> <ul style="list-style-type: none"> <li>• <b>Involves</b> forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.</li> <li>• <b>The activities may involve</b> physical contact: including assault by penetration e.g. rape or oral sex; or non-penetrative acts e.g. masturbation, kissing, rubbing &amp; touching outside of clothing</li> <li>• <b>They may also include</b> non-contact activities: e.g. involving children in looking at/ in the production of sexual images/ activities, encouraging children to behave in sexually inappropriate ways, grooming a child in preparation for abuse</li> <li>• Sexual abuse can take place online, and technology can be used to facilitate offline abuse.</li> </ul> <p>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p>	<div style="text-align: center; margin-bottom: 10px;"><b>Emotional</b></div> <p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on their emotional development. It may involve:</p> <ul style="list-style-type: none"> <li>• conveying to them that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person.</li> <li>• not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.</li> <li>• developmentally inappropriate expectations being imposed; interactions that are beyond the child's developmental capability</li> <li>• overprotection and limitation of exploration and learning</li> <li>• preventing the child participating in normal social interaction.</li> <li>• seeing / hearing the ill-treatment of another.</li> <li>• serious bullying (including cyberbullying) causing them frequently to feel frightened or in danger</li> <li>• exploitation or corruption of them.</li> </ul> <p>Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p>
<div style="text-align: center; margin-bottom: 10px;"><b>Neglect</b></div> <p>The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.</p> <p>It may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> <li>• provide adequate food, clothing and shelter (including exclusion from home or abandonment)</li> <li>• protect a child from physical and emotional harm or danger</li> <li>• ensure adequate supervision (including the use of inadequate care-givers)</li> <li>• ensure access to appropriate medical care or treatment.</li> </ul> <p>It may also include unresponsiveness to, or neglect of a child's basic emotional needs.</p>	<div style="text-align: center; margin-bottom: 10px;"><b>Physical</b></div> <p>A form of abuse which may involve:</p> <ul style="list-style-type: none"> <li>• Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm to a child.</li> <li>• Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.</li> <li>• Injuries in babies and non-mobile children.</li> </ul>

# Symptoms of Abuse



## Appendix 5: **Receiving Disclosures:**



### **Receive**

- Listen, try not to look shocked or be judgmental
- Believe what they say, accept what they say and take it seriously
- Don't make them feel bad by saying "you should have told me earlier"
- Don't 'interrogate' them – let them tell you, try not to interrupt
- Note the date and time, what was done, who did it and where it took place
- Don't criticise the perpetrator
- Don't ask leading questions – use 'open' questions to clarify only (T.E.D)



**Tell me what you mean by that?**

**Explain that to me**

**Describe that....**



### **Reassure**

- Stay calm, tell the child they've done the right thing in telling you
- Reassure them they are not to blame
- Empathise – don't tell them how they should be feeling
- Don't promise confidentiality, explain who needs to know
- Explain what you'll do next
- Be honest about what you can do



### **Report and Record**

- Make a brief, accurate, timely and factual record
- Discuss with the Designated Safeguarding Lead (DSL) or their Deputy, without delay
- The DSL will assess the situation and decide on the next steps

#### **Things to include:**

- Time and full date of disclosure/incident and the time and full date the record was made
- An accurate record of what was said or seen, using the child's words as appropriate
- Whether it is 1<sup>st</sup> or 2<sup>nd</sup> hand information
- Whether the child was seen/spoken to
- Whether information is fact/ professional judgement
- Full names and roles/status of anyone identified in the report
- Sign the record with a legible signature.
- Record actions agreed with/by the Designated Lead (SMART)
- Avoid acronyms/jargon/abbreviations

*Review records regularly and add any new concern. Respond to these immediately.*

**DO NOT PHOTOGRAPH INJURIES OR MARKS, EVEN IF REQUESTED TO DO SO.**

## Appendix 6: **Specific Safeguarding Issues**

### **Children missing from education**

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

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

The Yes Trust academies will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child criminal exploitation**

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

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

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

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, they will discuss this with the Pastoral Lead, DSL or Deputy DSL. These staff will then trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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



## **Domestic abuse**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse, child/adolescent to parent violence and abuse as well as ill treatment that isn't physical. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Domestic abuse can be physical, sexual, financial, psychological or emotional.

Older children may also experience domestic abuse and/or violence in their own personal relationships. They can be victims or perpetrators.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. Children who witness domestic abuse are also victims.

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

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

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy DSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the centre Pastoral Lead, DSL or Deputy DSL will also make a referral to children's social care.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL or deputy who will activate local safeguarding procedures.

## **Breast ironing (also known as breast flattening)**

This is an act of abuse performed on young girls (from around the age of 9 years old) in which their breasts are ironed, massaged and/or pounded, burned with heated objects or covered with an elastic belt to prevent or delay the development of their breasts, the intention being to protect the child from rape, forced marriage, sexual harassment or removal from education. It is a practice that occurs in Cameroon, Nigeria and South Africa. It is often carried out by the girl's mother.

Section 11 of this policy sets out the procedures to be followed if a staff member has concerns that a child has been subject to, or is at risk of this form of abuse.

## **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 11.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

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

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

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

### **Forced marriage**

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

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

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

The DSL or Deputy DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **Preventing radicalisation**

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;

- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

Keystone Academy will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

### **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers, sometimes called 'teenage relationship abuse'
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 11 of this policy, as appropriate. In particular, section 11.8 and 11.9 set out more detail about our school's approach to this type of abuse.

### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

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

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

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

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 11 of this policy, as appropriate. In particular, section 11.8 and 11.9 set out more detail about our school's approach to this type of abuse.

### **Serious violence**

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

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

## **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of Senior leadership staff

If the visitor is unknown to the setting, senior leadership staff will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

## **Non-collection of children**

If a child is not collected at the end of the session/day, the Academy staff will take action to ensure that the young person gets home safely. This could include:

- a phone call home to parents / carers to try and resolve the situation
- contact with agencies involved with the family (such as social worker, family support worker) to try and resolve the issue
- a referral to social care, using the duty line detailed in section 11 of this policy
- while awaiting a resolution to the situation, the DSL or Deputy DSL will supervise the child in school, if after school hours

A record of the incident will be recorded using our usual systems detailed in section 19 of this policy.

## **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will inform the Police, parents/carers and if relevant other agencies such as social services straight away.

A record of the incident will be recorded using our usual systems detailed in section 19 of this policy.

## **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.



Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. The Academy's PSHE curriculum provides opportunities to educate pupils on keeping safe in the community.

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

If a member of staff has a concern about a pupil being at risk of child abduction or other community safety incidents, they will report this to the Pastoral Lead, DSL or Deputy DSL.

If a staff member observes an unknown person / people loitering in the vicinity of the school, they will:

- immediately alert the senior leadership staff on site who will take action to manage the immediate security of the building and safety of pupils and staff

Further action may include:

- Pastoral Lead and / or DSL will inform family members and / or relevant agencies
- Safeguarding Supporting Worker and DSL will agree and put in place an immediate safety plan

### **Children's involvement in the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support [children 5-11-year olds](#) and [12-17 year olds](#). The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

We work closely with agencies to ensure the pupil and their family are supported. In our schools, using key staff, we provide pastoral support and aim to maintain normality as much as possible. Where appropriate, relevant staff are made aware of pending court cases and know to provide reasonable adjustments to ensure the wellbeing of pupils involved. This can include:

- 1:1 support
- therapeutic interventions
- temporary adapted timetable and curriculum
- access to transport

### **Children with family members in prison**

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

Staff work closely with agencies, such as social care, to ensure pupils are supported. We understand that coping with transitions relating to family members being in prison can be challenging for the child and their family:

- arrests leading to court cases and incarceration can be traumatic
- family members returning home after a period of time in prison can cause either joy or concern, depending upon the circumstances and relationship within the family

As a result, staff work together to both understand and support the individuals involved.

If staff have any concerns about the wellbeing or safeguarding of a pupil in relation to a family member they will report this to the Pastoral Lead, DSL or Deputy DSL.

## **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing. Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#).

If staff have any concerns about a child’s involvement with county line, or a child makes a report to them, they will follow the procedures set out in section 11 of this policy, as appropriate.

The Pastoral Lead and / or DSL will report any intelligence to the police via local information sharing procedures.

## **Modern slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the

removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

If staff have any concerns about a child's safety in relation to modern slavery, or a child makes a report to them, they will follow the procedures set out in section 11 of this policy, as appropriate.

### **Trafficked Children**

Human trafficking is defined by the United Nations, in respect of children, as "the recruitment, transport, transfer, harbouring or receipt of a person by such means as threat or use of force or other forms of coercion, of abduction, of fraud or deception for the purpose of exploitation."

Any child transported for exploitative reasons is considered to be a trafficking victim.

As a school we are alert to the signs both for our children and for their families:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history with missing links and unexplained moves
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Is excessively afraid of being deported
- Looks malnourished or unkempt
- Is withdrawn, anxious and unwilling to interact
- Is under the control and influence of others
- Lives in cramped, dirty, overcrowded accommodation
- Has no access or control of their passport or identity documents
- Appears scared, avoids eye contact, and can be untrusting
- Shows signs of abuse and/or has health issues

For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation/the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse

- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones etc. with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite having not been at home
- Having keys to premises other than those known about
- Low self-image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
- Truancy/disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing and being found in areas where the child or young person has no known links
- Possible inappropriate use of the internet and forming online relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case.

If staff believe that a child is being trafficked, this will be reported to the Designated Safeguarding Lead and will be reported as potential abuse.

## **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If staff have any concerns about a child's safety in relation to, or involvement in cybercrime, or a child makes a report to them, they will follow the procedures set out in section 11 of this policy, as appropriate.

Where there are concerns about a child in this area, the DSL (or a deputy), will liaise with our local Police Cyber Protect Officer.

In addition, the DSL will consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, '[NPCC- When to call the Police](#)' and [National Cyber Security Centre](#) - NCSC.GOV.UK

## **Self-harm and Suicide**

Due to the specific mental health needs of our students we recognise that self-harm and the risk of suicide will be increased. The Academy will support its students and their families to reduce these risks and keep our students safe. We will do this by:

- A co-ordinated school response to people at risk and staff training
- Each student will have a student profile and which includes a risk assessment so staff members can be fully aware of a child's triggers and know each child well
- Awareness among staff to help identify high risk signs or behaviours (depression, drugs, self-harm) and protocols on how to respond
- Signposting parents to sources of information on signs of emotional problems and risk
- Varied and open lines of communication between home and school
- Attendance Policy that ensures that non-attendance is monitored closely and contact is made with students and their families at the earliest opportunity
- Clear referral routes to specialist mental health services. The majority of our students will be known to CAMHS and clinics for CAMHS professionals will be held on site to further support access to Mental Health support.
- Access to support from a Mental Health Counsellor on site. All staff are aware that if they foresee imminent or increased risk of harm, the DSL should be informed and students should be closely monitored to ensure their safety. Where necessary students will be taken to A&E or referred to Social Care.
- Open and planned support from the schools Pastoral Team.

[Self – Harm Pathway; A Guide for School Staff.](#)

[Suicide Prevention: Policy and Strategy. October 2019](#)

## **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a grandparent, brother, sister, uncle or aunt and includes half-siblings and step-parents. It does not include great-aunts or uncles, great-grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start. Not informing the LA is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, we recognise that they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come

from another country. In some cases privately fostered children are affected by abuse and neglect, or are involved in trafficking, child sexual exploitation or modern-day slavery.

Where a member of staff becomes aware of private fostering arrangements, they need to notify the DSL immediately. The DSL will then speak to the family of the child involved to check that they are aware of their duty to inform the local authority children's social care. The school would also inform the LA of the private fostering arrangements.

### **Children missing out on education, children missing from education**

Under Section 175 of the Education Act 2002 we have a duty to investigate any unexplained absences. A child going missing from education is a potential indicator of abuse or neglect.

Our Academy's follow local procedures for dealing with children that go missing from lessons and/or school. All staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

We also ensure that we are rigorous in our attendance procedures and these are outlined in our [Attendance Policy](#). Where a child's destination is unknown when they have left our school, we ensure we carry out all necessary checks and refer them as Children Missing Education (CME), using the appropriate notification form on the local authority website, so that they can be followed up on. Staff are aware of the trafficking of children and the importance of rigour around our attendance procedures to reduce this as a threat to our children's safety.

## Appendix 7 : **Safer recruitment and DBS checks – policy and procedures**

### **Recruitment and selection process**

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

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

### **Advertising**

When advertising roles, we will make clear:

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

### **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children
- Include a copy of, or link to, our child protection and safeguarding policy and reference is made to the LA policy on the employment of ex-offenders
- Require applicants to complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage, should they be shortlisted. This information will only be viewed once the applicant has been shortlisted. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Require the applicants to sign a declaration confirming the information they have provided is true

### **Shortlisting**

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

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



## **Seeking references and checking employment history**

The Trust will obtain references after the interview. Any concerns raised will be explored further with referees.

When seeking references we will:

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

## **Interview and selection**

When interviewing candidates, we will:

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

## **Pre-appointment vetting checks**

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

### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available. They will be required to register for the annual DBS update service
- Verify their mental and physical fitness to carry out their work responsibilities, via occupational health

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

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

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

#### **Existing staff**

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

In addition we will carry out regular checks for existing staff:

- Review DBS checks at least every 10 years
- Review barred list every year
- The Headteacher and DSL will check the Single Central Register (SCR) on a half termly basis

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

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

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

### **Agency and third-party staff**

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

### **Contractors**

The Trust will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

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

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Local Support and Scrutiny Board**

All LSSB members will have an enhanced DBS check without barred list information.

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

All LSSB members will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

### **Staff working in alternative provision settings**

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

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

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

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



## **Youth Engagement Schools Trust**

### **Allegations Against Staff and Low-Level Concerns Policy**

**Approved by: Board of Trustees**

**Reviewed by: ELT (CH and CW) & Finance, HR and Premises Committee**

**Latest Policy review: Autumn 2022**

**Next Policy review date: Autumn 2023**

## Section 1: allegations that may meet the harms threshold

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

- › Behaved in a way that has harmed a child, or may have harmed a child, and/or
- › Possibly committed a criminal offence against or related to a child, and/or
- › Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- › Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

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

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

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

## Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

- › Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- › Providing an assistant to be present when the individual has contact with children
- › Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- › Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- › Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Youth Engagement Schools Trust

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

## Definitions for outcomes of allegation investigations

- › **Substantiated:** there is sufficient evidence to prove the allegation
- › **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- › **False:** there is sufficient evidence to disprove the allegation

- › **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- › **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

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

- › Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- › Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- › Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- › Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- › Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- › **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- › **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- › **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- › Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Additional signposting to support services and support can be obtained through the Trust's HR Manager.
- › Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are



ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- › Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- › Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

All schools continue with:

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

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

### **Additional considerations for supply teachers and all contracted staff**

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

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

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

### **Timescales**

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

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

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

### **Specific actions**

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

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

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

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

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

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

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

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

If a report is:

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

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

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

### **Confidentiality and information sharing**

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

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

- Who needs to know about the allegation and what information can be shared

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

## **Record-keeping**

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

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## **References**

When providing employer references, we will:

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

## **Learning lessons**

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

This will include consideration of (as applicable):

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

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

### **Non-recent allegations**

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

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

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

### **Section 2: concerns that do not meet the harm threshold**

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

Concerns may arise through, for example:

- › Suspicion
- › Complaint
- › Safeguarding concern or allegation from another member of staff
- › Disclosure made by a child, parent or other adult within or outside the school
- › Pre-employment vetting checks

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

### **Definition of low-level concerns**

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

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

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

- › Being overly friendly with children
- › Having favourites
- › Taking photographs of children on their mobile phone

- › Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- › Humiliating pupils

### **Sharing low-level concerns**

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

We will create this culture by:

- › Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- › Empowering staff to share any low-level concerns as per section 7.7 of this policy
- › Empowering staff to self-refer
- › Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- › Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- › Helping to identify any weakness in the school's safeguarding system, including use of CPOMS
- › Holding regular staff briefings to encourage sharing of low level issues and concerns

### **Responding to low-level concerns**

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

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

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

All notes and outcomes from any such investigations will be recorded and stored confidentially by the Headteacher and shared only with appropriate senior colleagues such as the DSL and Trust Executive Leaders.

### **Record keeping**

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

Records will be:

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

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

## References

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

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