# NEW BRIDGE
## MULTI ACADEMY TRUST

**Safeguarding and Child Protection Policy 2022 to 2023**

| Document Control Information | |
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| **Document Title** | Child Protection and Safeguarding Children Policy |
| **Organisation / Site** | New Bridge Multi Academy Trust |
| **Review Period :** | The review period will be annual. |
| **Document Owner and Reviewer:** | The senior manager responsible for this policy is Executive Director Safeguarding |
| **Approval Committee** | Trustees |

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| Equality Impact | |
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| **Statement** | We welcome feedback on this document and the way it operates. We are interested to know of any possible or actual adverse impact that may affect any groups in respect of any of the equalities act 2010 protected characteristics. |
| **Screening** | This document has been screened by the person responsibility for equality and the impact has been assessed on the last page of this document. |

**Contents**

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**Key Contacts for Safeguarding and Child Protection**

| | |
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*Oldham Schools*
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**New Bridge School**

| | |
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| Designated Safeguarding Lead (DSL) Designated Looked After Children Lead | **Alison Tootill** |
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| School telephone number | 0161 883 2401 |
| Deputy Designated Safeguarding Leads | Debbie Hall<br><br>Steve Meadows<br><br>Jaki Soltyk |
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| Nominated Governor for Safeguarding | |
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### New Bridge Learning Centre

| | |
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| Designated Safeguarding Lead (DSL) Designated Looked After Children Lead | **Dawn Allison** |
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| School telephone number | 0161 883 2402 |
| Deputy Designated Safeguarding Leads | John Barker<br>Luke Haga |
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| Contact email | |

### New Bridge College

| | |
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| Designated Safeguarding Lead (DSL) Designated Looked After Children Lead | Nic Nelson |
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| Contact email | |
| Nominated Governor for Safeguarding | |
| Contact email | |

### Spring Brook Academy (Lower)

| | |
|---|---|
| Designated Safeguarding Lead (DSL) Designated Looked After Children Lead | **Toni Thomason** |
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| School telephone number | 0161 883 2431 |
| Deputy Designated Safeguarding Leads | Jackie Sanderson |
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| Nominated Governor for Safeguarding | Val Shaw |
| Contact email | vshaw@newbridgegroup.org |

**Spring Brook Academy (Upper)**

| | |
|---|---|
| Designated Safeguarding Lead (DSL) Designated Looked After Children Lead | **Mel Rodgers** |
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| School telephone number | 0161 883 2431 |
| Deputy Designated Safeguarding Leads | Katie Cholewa <br> Paul Wiswell |
| Contact emails | kcholewa@newbridgegroup.org <br> pwiswell@newbridgegroup.org |
| Nominated Governor for Safeguarding | Val Shaw |
| Contact email | vshaw@newbridgegroup.org |

**Springboard Project**

| | |
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| Designated Safeguarding Lead (DSL) Designated Looked After Children Lead | Mike Pidlyskyj |
| Contact email | mpidlyskyj@newbridgegroup.org |
| School telephone number | 0161 883 3250 |
| Deputy Designated Safeguarding Leads | Victoria Blackburn <br> Steve Molloy |
| Contact emails | vblackburn@newbridgegroup.org <br> smolloy@newbridgegroup.org |
| **Nominated Governor for Safeguarding** | Anne Clarke |
| Contact email | Anne.Clark@oldham.gov.uk |

**Oldham Local Authority Contacts**

| | |
|---|---|
| Local Authority Designated Officer (LADO) | Colette Morris |
| Telephone | 0161 770 8870 <br> 07583 101863 |

*Oldham LA*
**Urgent concerns can be reported by telephoning the police or the Multi-agency Safeguarding Hub (MASH) team:**
    **101 (999 in emergency)**
    **0161 770 7777 between the hours of 08:40am – 5:00pm**
    **0161 770 6936 (Emergency Duty Team) outside of these hours**
    Email: adult.mash@oldham.gov.uk (adults)
    Email: child.mash@oldham.gov.uk (children)

On-line referral https://adt.oldham.gov.uk/mashreferrals/WR00MASH.aspx

Multi-Agency Safeguarding Hub (MASH) Referral - to report concerns about the welfare or well-being of a child, young person or to request Early Help Services.

Ask for a social care assessment - to refer yourself or someone you know for a Care Act assessment for care and support, or to report a safeguarding concern for a vulnerable adult.

Children missing education
**Pupil Tracking Team Access Service, Level 12, Civic Centre, West Street, OL1 1XJ**

T: 0161 770 4201  Fax: 0161 770 4277  E: cme@oldham.gov.uk


***Prevent in Oldham***
Council contacts: Prevent lead –Neil Consterdine, Assistant Director Communities & Leisure: Neil.Consterdine@oldham.gov.uk  However, for Prevent queries you should contact Natalie Downs as the operational lead:Natalie.Downs@oldham.gov.uk
If you are worried if a child is being radicalised or if want to make a referral to prevent complete a MASH referral.


**National contacts**

If you are concerned about extremism in school, or if you think a child might be at risk of extremism, contact the helpline on 020 7340 7264 or counter.extremism@education.gov.uk

***Tameside Schools***


**Hawthorns School**

| Designated Safeguarding Lead (DSL) Designated Looked After Children Lead | Debbie Fitton |
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| Contact email | debbie.fitton@newbridgegroup.org |
| School telephone number | 0161 370 1312 |
| Deputy Designated Safeguarding Leads | Pierre Coiffait Janet Sarno Sonia Jones |
| Contact email | pierre.coiffait@newbridgegroup.org janet.sarno@newbridgegroup.org sonia.jones@newbridgegroup.org |
| Chair of Governors | Fiona Armstrong |
| | fiona.armstrong@newbridgegroup.org |
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**Samuel Laycock School**

| Designated Safeguarding Lead (DSL) Designated Looked After Children Lead | Katie Cochran |
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| Deputy Designated Safeguarding Leads | Helen Wilson |
| Contact email | hwilson@newbridgegroup.org |
| Nominated Governor for Safeguarding | |
| Contact email | |

**Tameside Local Authority Contacts**

| Local Authority Designated Officer (LADO) | Tania Brown<br><br>tania.brown@tameside.gov.uk |
|---|---|
| Telephone | 0161 342 4398 |

*Tameside LA*

If you think a child/young person is in significant and imminent harm and require an immediate response please call 999

All safeguarding concerns should be reported to the Children's Hub using the Multi-Agency Request for Service Form (MARS).

Tameside Children's Multi-agency Safeguarding Hub should be contacted if you need support or advice on safeguarding children/young people and/or if you believe that a child/young person is at risk of significant harm on:

Monday to Wednesday: 8:30am - 5pm
Thursday: 8:30am - 4:30pm
Friday: 8:30am - 4pm
Telephone Contact Number: 0161 342 4101
Monday to Friday outside of normal hours weekends and public holidays
Telephone Contact Number: 0161 342 2222

If you are concerned about or have information to share about a child who may be missing from education please contact cme@tameside.gov.uk

***Prevent in Tameside***

Tameside local authority has a page dedicated to prevent extremism. The website includes, what to do if you are worried if a child is being radicalised or if want to make a referral to prevent.  https://www.tameside.gov.uk/extremism

**National link**

If you are concerned about extremism in school, or if you think a child might be at risk of extremism, contact the helpline on 020 7340 7264 or counter.extremism@education.gov.uk

**Other useful contact numbers**
NSPCC Child Protection helpline – 0800 800 5000 (a free 24 hour service)
NSPCC Whistleblowing Advice Line 0800 028 0285
Childline – 0800 1111 (a free 24 hour helpline for children)

**NSPCC FGM Helpline**
Contact days and times: **24 hours**
Tel: **0800 028 3550**
Email: **fgmhelp@nspcc.org.uk**

1. **Purpose:**
   1.1   New Bridge Multi Academy Trust (the Trust) fully recognises its responsibilities for safeguarding children. Our students' welfare and safety are at the heart of each school's ethos and in everything we do.

   1.2   In this policy, a 'child' means all children and young people below 18 years of age.

   1.3   In accordance with relevant law and guidance, as set out below in the second section, this policy details our procedures for safeguarding and child protection.

2. **Scope of Policy**
   2.1   It is applicable to the whole Trust community. Safeguarding and promoting the welfare of children is everyone's responsibility, whether they work or volunteer in in any of our schools. Everyone has a role to play in child protection and safeguarding.

   2.2   All staff and volunteers will ensure that their approach and actions are child-centred. This means that they'll consider, at all times, what is in the best interests of the child. Because of the day to day contact with students, Trust staff and volunteers are well placed to observe signs of harm, abuse, neglect, child-on-child sexual violence and sexual harassment, victimisation and/or exploitation.

3. **Reason for Policy / Review of Policy**
   3.1   This policy was reviewed to take into account new statutory guidance/advice 2022

4. **Aim(s)**
   4.1   The Trust ensures that arrangements are in place to safeguard and promote the welfare of students by:
   *4.1.1.*   creating and maintaining an environment where all students feel secure, are encouraged to communicate, and are listened to.
   *4.1.2.*   making sure that all students know which adults in their school they can approach if they have any worries. There are posters displayed on each school site so that contact details are always to hand.
   *4.1.3.*   teaching students to keep themselves safe from all forms of abuse including: child sexual exploitation, female genital mutilation, forced marriage, extremism, radicalisation, and child-on-child abuse including sexual violence and sexual harassment.
   *4.1.4.*   appointing senior members of staff from each school leadership team to the roles of Designated and Deputy Safeguarding Leads.
   *4.1.5.*   providing effective, relevant and ongoing training and development for all staff and Governors. We do this through a variety of external providers, including local authority, internal training and online training.
   *4.1.6.*   swiftly and effectively addressing any concerns and ensuring robust, timely referrals are made to other agencies. Ensuring effective links with relevant agencies in all matters regarding safeguarding and child protection.

*4.1.7.* reviewing and supporting students who are subject to child protection plans and contributing to the implementation of the plan.

*4.1.8.* keeping meticulous records of concerns about students, even where there is no need to refer the matter immediately (this includes recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately.

*4.1.9.* ensuring the suitability of all staff through safe recruitment practice and maintaining an accurate and up to date Single Central Register.

*4.1.10.* making sure that all Trust staff and volunteers understand their responsibilities with regard to safeguarding and child protection.

*4.1.11.* ensuring that parents and carers also have an understanding of the responsibility placed on the Trust and its staff for safeguarding and child protection.

*4.1.12.* maintaining awareness of those students who are persistently absent or missing from school, notifying the local authority in line with 'Children Missing in Education' protocols.

*4.1.13.* maintaining clear procedure in line with the latest guidance for reporting allegations against staff members.

4.2 Furthermore, the Trust recognises that:

*4.2.1.* some students are at increased risk of abuse.

*4.2.2.* some students face additional barriers with respect to recognising or disclosing abuse.

4.3 The Trust is committed to recognising diversity and ensures anti-discriminatory practices. We ensure that all students have the same protection. We give special consideration to students who:

*4.3.1.* have special educational needs (SEN) or disabilities

*4.3.2.* are young carers.

*4.3.3.* show signs of mental health problems.

*4.3.4.* are missing education.

*4.3.5.* may experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.

*4.3.6.* are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.

*4.3.7.* are asylum seekers.

*4.3.8.* have English as an additional language.

*4.3.9.* are known to be living in difficult situations e.g. where there are issues at home, such as: substance abuse/misuse or domestic violence or where a family member has mental health needs.

*4.3.10.* are at risk due to either their own or a family member's mental health needs.

*4.3.11.* are within the care system and are looked after or have been previously looked after or have a social worker.

## 5. Procedures and Practice
### 5.1 *Safeguarding Children*
*5.1.1.* The Trust recognises that safeguarding covers a broad range of areas and it aims to achieve the following:

*5.1.2.* Protecting children from maltreatment.

*5.1.3.* Preventing impairment of children's mental and physical health and/or development.

*5.1.4.* Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.

*5.1.5.* Undertaking that role so as to enable children to have optimum life chances, so they can enter adulthood successfully

5.2 As part of meeting a child's needs, the Trust:

*5.2.1.* recognises that sharing information, particularly with safeguarding partner agencies and other professionals, in a timely manner is crucial in identifying and tackling all forms of abuse and neglect. 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. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

*5.2.2.* recognises that, to facilitate the sharing of 'special category personal data,' the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

*5.2.3.* will identify children who may benefit from the Early Help process and make timey disclosures to the Local Authority to enable that process to begin. Working with safeguarding partners and other professionals to assist with these assessments and work flowing from these assessments.

*5.2.4.* recognises that mental health issues can be an indicator of abuse and neglect and will share any such concerns appropriately

*5.2.5.* will identify students who may be suffering from significant harm and make child protection referrals.

*5.2.6.* will identify students who need extra help and make appropriate referrals, including to early help service, to prevent concerns escalating.

5.3 The Trust also understands the importance of contextual safeguarding, i.e. that incidents or behaviours can be associated with factors outside the school and can occur between children outside of school. All staff should be considering the context within which such incidents and behaviours occur. This is known as contextual safeguarding and simply means that assessments should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare

5.4 ***Legislation and guidance***

*5.4.1.* This policy for the Trust is derived from a variety of legislative provision and statutory guidance. In particular, it is based on good practice found in:

5.4.1.1. Keeping Children Safe in Education September 2022.

5.4.1.2.    Working Together to Safeguard Children (2018).

5.4.1.3.    Governance Handbook.

*5.4.2.*    Our safeguarding policy and procedures comply with all of this guidance and is updated with local arrangements agreed and published by the three local safeguarding partners

*5.4.3.*    The following legislation is also incorporated into this policy:

5.4.3.1.    The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.

5.4.3.2.    Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers to report to the police where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in Statutory guidance on FGM.

5.4.3.3.    The Rehabilitation of Offenders Act 1974 (Amended 2013 and 2020) outlines provisions for when people with criminal convictions can work with children.

5.4.3.4.    'Regulated activity' in relation to children is found in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006.

5.4.3.5.    Schools' "PREVENT" duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism can be found in: Statutory guidance on the Prevent duty.

5.4.3.6.    The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

5.4.3.7.    The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

5.4.3.8.    The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

*5.4.4.* Other statutory provisions relevant to child protection and safeguarding include:

5.4.4.1. The Education Act 2002 (section175/157).

5.4.4.2. The Education (pupil information) (England) Regulations 2005.

5.4.4.3. Prevent Duty Guidance for England and Wales – September 2015.

5.4.4.4. The Sexual Offences Act, 2003, Home Office.

5.4.4.5. Teaching on-line safety in schools, DfE, 2019

*5.4.5.* A full list of the guidance this policy has referred to, and which staff can refer to for further information, can be found in Appendix 3: 'The Schools' Statutory Duty.

*5.4.6.* The duty for all academies, including free schools and all independent schools, to safeguard and promote the welfare of pupils at the school is set down in Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014.

*5.4.7.* The Trust's policy reflects these duties and complies with our funding agreement and articles of association.

*5.4.8.* The Trust 's policy reflects the requirements of 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 in childcare.

*5.4.9.* It also reflects the provisions of the Statutory Framework for the Early Years Foundation Stage which deals with safeguarding and welfare in the childcare sector.

5.5 **Related Policies**

*5.5.1.* Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

*5.5.2.* This document must therefore be read, used, and applied alongside each school's policies and procedures referred to below

5.6 *Responsibilities*

*5.6.1.* The Trust recognises that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents or carers has a role to play in safeguarding children.

*5.6.2.* All staff working (including visiting staff) in the Trust are required to:

5.6.2.1. 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.

5.6.2.2. Be aware of our child protection and safeguarding policy and procedures, including referrals to statutory agencies. They must understand the role of the DSL and know how to deal with children missing from education

5.6.2.3. Observe and comply with the staff code of conduct, which includes the Low Level Concerns Policy.

5.6.2.4. Attend all relevant training and development provided by the Trust and be aware of all their responsibilities in line with Keeping Children Safe in Education September 22.

5.6.2.5. Know how to deal with a disclosure. If a student discloses to a member of staff that they are being abused, the staff member should follow the guidance set out in Appendix 1.

5.6.2.6. Report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead, or in their absence, the Deputy, in line with the Child Protection Procedures and legal duty for reporting FGM as set out in this policy.

5.6.2.7. Understand the Trust's Allegations of Abuse Made Against Staff policy and procedure and knows what to do in the event of an allegation made against someone working with children.

5.6.2.8. Know what to look for to identify children who need help or protection

5.6.2.9. Be alert to the signs of harm and abuse, including issues that can manifest themselves due to child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines) Staff should follow the Child Protection Procedures with regards to child-on-child abuse as outlined in this policy. Further information can be found in Appendix 2.

5.6.2.10. Be aware that children can be at risk of harm inside and outside of their home, at school and online

5.6.2.11. Be aware that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children

5.6.2.12. Know the Designated and Deputy Safeguarding Lead's name and contact details including telephone numbers and email.

5.6.2.13. Be aware of the early help process. This includes identifying emerging problems, liaising with the Designated

Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment

5.6.2.14. Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

5.6.2.15. Provide a safe space for pupils who are LGBT to speak out and share their concerns

5.6.3. The Governing Body and Trustees will:

5.6.3.1. Assess the impact of this policy in keeping children safe.

5.6.3.2. Contribute any local, contextual information that may support children's safety and welfare.

5.6.3.3. Appoint a nominated Governor to liaise with the Head of Site and Designated Safeguarding Lead (DSL) on Safeguarding issues.

5.6.3.4. Receive and consider regular reports from the Head of Sites about the effectiveness of safeguarding and child protection at each school.

5.6.3.5. Keep abreast of training to ensure that staff have the skills, knowledge and understanding necessary to keep all children safe.

5.6.3.6. Review and annually approve the safeguarding policy, ensuring it complies with all law, regulation and good practice. They will also hold the Executive Director Safeguarding and Heads of Sites to account for its implementation. (Trustees will hold the ED account and local Governor will hold the heads of site to account)

5.6.3.7. Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

5.6.3.8. Make sure:

5.6.3.8.1. The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support

5.6.3.8.2. Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

5.6.3.8.3. The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns

> 5.6.3.8.4. ==The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure==
>
> 5.6.3.8.5. ==That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised==

5.6.3.9. ==Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):==

5.6.3.10. The Chair of the Trustees will receive any allegations made against the CEO.

5.6.3.11. All Governors and Trustees must read Keeping Children Safe in Education.

*5.6.4.* The Executive Directors of the Trust will:

5.6.4.1. Be responsible for the implementation of this and all related policies and procedures, ensuring that the outcomes are monitored.

5.6.4.2. Ensure that whilst the activities of the Designated Safeguarding Lead (DSL) can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out below, remains with the DSL.

5.6.4.3. Meet regularly with the DSL.

5.6.4.4. Ensure that the DSL has appropriate time, funding, training, and resources to fulfil all of their functions and ensure adequate cover in the event that the DSL isn't available.

5.6.4.5. Ensure that everyone connected to the Trust is aware of this policy including safeguarding and child protection procedures.

5.6.4.6. Attend advanced training with an accredited provider.

5.6.4.7. Ensure that all staff are vigilant to harm and abuse, are able to identify those students for whom there are child protection concerns, and can make appropriate referrals, including to early help services.

5.6.4.8. Be alert to the signs of harm and abuse and specific safeguarding issues including but not limited to: Child Sexual Exploitation (CSE); Child Criminal Exploitation including County Lines activity; serious violent crime including serious

violent sexual offences; ==child-on-child== abuse, FGM, and radicalisation. ==child-on-child== abuse can manifest itself in many ways but often in bullying (including cyber bullying) gender based violence / sexual assaults and sexting. Staff should follow the Child Protection Procedures with regards to ==child-on-child== abuse as outlined in this policy.

5.6.4.9. Appoint a designated teacher to promote the educational achievement and welfare of students who are looked after and to ensure that this person has appropriate training.

5.6.4.10. Communicate clearly to visitors, parents, and students so everyone understands the Trust's safeguarding policy and procedures.

5.6.4.11. Appoint a DSL and Deputy DSL giving consideration to the range of responsibilities the DSL undertakes, e.g. the DSL needs to have the flexibility to act immediately on a referral that requires an urgent response and time to attend lengthy meetings or case conferences.

5.6.4.12. Ensure that contact and role details of the DSL and Deputy DSL are clearly displayed in staff online areas and the website (along with this policy).

5.6.4.13. Report to the Governing Body and Trustees regularly regarding the effectiveness of safeguarding and implementation of related policies.

5.6.4.14. Ensure safe recruitment practice is followed when recruiting for posts, and ensure appropriate action is taken when an allegation is made against a member of staff.

5.6.4.15. Ensure all appropriate checks are made in relation to all staff, volunteers, and visitors, including Section 128 checks for School Governors and Trustees.

5.6.4.16. Ensure each school offers a safe environment via a robust health and safety policy and procedure to meet the statutory responsibilities for the safety of students and staff at school

5.6.4.17. Ensure the relevant staffing ratios are met, where applicable.

5.6.4.18. Make sure each child in the Early Years Foundation Stage is assigned a key person.

5.6.5. The Executive Director Safeguarding is responsible for:
5.6.5.1. Ensuring the Trust's safeguarding policy and practice is relevant and consistent with the most recent statutory guidance outlined in Appendix 3 and 4.

5.6.5.2. Being aware of the latest national and local guidance and requirements and keeping the Head of Site and staff informed as appropriate.

5.6.5.3. Ensuring that appropriate training for staff (including periodic updates via e-bulletins, email, or as part of staff meetings) is organised according to the agreed programme with the Head of Site and renewed through ongoing professional development.

5.6.5.4. Ensuring that all staff have an understanding of child abuse, neglect, and child-on-child abuse (including serious violence and serious sexual violence, Child Criminal Exploitation, FGM, and Prevent) and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs and disabilities (SEND).

5.6.5.5. Ensuring that adequate reporting and recording systems are in place.

5.6.5.6. Ensuring relevant records (and further information not contained in the child's child protection file) are passed on appropriately when students transfer to other schools, or are being educated at alternative provision or off-site education

5.6.6. The Designated Safeguarding Leads at each site are responsible for:

5.6.6.1. Being available for all staff to discuss any safeguarding issues or concerns

5.6.6.2. Ensuring all staff are aware of the DSL and deputy contact details.

5.6.6.3. Ensuring that all cases of suspected or actual problems associated with child protection or safeguarding concerns (including cases where the early help process may be appropriate) are referred to the appropriate agencies in line with procedures set out in this policy, keeping the Head of Site appraised.

5.6.6.4. Attending accredited, enhanced training every two years, as required to fulfil the role.

5.6.6.5. Ensuring families are fully aware of the school and Trust policies and procedures and kept informed and involved.

5.6.6.6. Ensuring that effective communication and liaison takes place between the school and the Local Authority or partner agencies, and any other relevant agencies, where there is a Safeguarding concern in relation to a student.

5.6.6.7. Maintaining details of any looked after child's social worker and the name of the Virtual School Head (in the authority that looks after the child).

5.6.6.8. Dealing with allegations of abuse, including assessments for early help, in accordance with local and statutory procedures.

5.6.6.9. Supporting the staff member in liaising with other agencies and setting up an interagency assessment as appropriate if early help is appropriate.

5.6.6.10. Liaising with the Governing Body's nominated Governor for safeguarding.

5.6.6.11. Being aware of children who are or who may be living in a private fostering arrangement and informing the LA Multi-agency Safeguarding Hub

5.6.6.12. Undertaking the LA Children's Safeguarding Partnership annual safeguarding audit.

5.6.6.13. Referring 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.

5.6.6.14. Contributing and helping other staff to contribute to early help assessments.

5.6.6.15. Have a good understanding of harmful sexual behaviour

5.6.6.16. Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

5.6.6.17. Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

5.6.6.18. Meeting regularly with the Head of Site to discuss safeguarding issues including outcomes and implementation of actions relating to case conferences and core groups and all current case work. Other key staff will be invited as appropriate. Safeguarding matters arising will be discussed routinely at each staff and/or Senior Leadership Team (SLT) meeting.

5.6.6.19. Working with the relevant Virtual School Head to discuss how funding can be best used to support the progress of looked after children at the school and meet the needs identified in the student's personal education plan

5.7 **Child Protection Procedures**
   5.7.1. Staff at the Trust will follow the necessary child protection procedures if an incident occurs. They will be made aware that:
   5.7.1.1. Where a child is in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately.

   5.7.1.2. Anyone can make a referral.

5.7.1.3. Staff should not assume that somebody else will take action/share information that might be critical in keeping children safe.

5.7.1.4. Where referrals are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made.

5.7.1.5. The reporting of concerns relating to Female Genital Mutilation (FGM) is mandatory to the police (and DSL should be informed).

5.7.1.6. The DSL or Deputy DSL will always be available to discuss safeguarding concerns.

5.7.1.7. If staff are concerned that a safeguarding concern has not been acted on, this should be escalated to the Executive Director of Safeguarding.

5.7.1.8. When a member of staff at the Trust suspects that any student may have been subject to abuse, or a student has suggested that abuse has taken place either to themselves or another student, the allegation must be reported immediately to the Designated Safeguarding Lead (DSL) or the Deputy DSL if the DSL is off site.

5.7.2. The DSL or Deputy DSL will:
5.7.2.1. Ensure the allegation is acted on within the school day.

5.7.2.2. Ensure that the Head of Site is informed of all allegations unless the allegation is against the Head, in which case the CEO will be informed or the allegation is against the CEO in which case the Chair of Trustees will be informed.

5.7.2.3. Deal with the allegation in accordance with the agreed procedures. In the case of a violent sexual assault or sexual harassment matter, the Trust will follow the latest procedures as set out in Keeping Children Safe in Education September 22

5.7.2.4. Be best placed to carry out a risk assessment of the issue and determine the escalation and timescales for dealing with the allegation.

5.7.2.5. It is best practice to ensure that all colleagues who are involved in the allegation are informed of the outcome, so there is closure or continual vigilance as necessary.

5.7.3. Allegations of Abuse
5.7.3.1. Appendix 1 provides guidance and detail about:
5.7.3.1.1. Each child abuse category.
5.7.3.1.2. Potential signs of abuse.
5.7.3.1.3. Specific procedures about how to deal with a disclosure.

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*5.7.4.* ***Female Genital Mutilation (FGM)***

    5.7.4.1. The FGM Mandatory Reporting Duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires teaching staff to make a report to the police where, in the course of their professional duties, they either:

    5.7.4.2. Are informed by a girl under 18 that an act of FGM has been carried out on her; or they

    5.7.4.3. Observe 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.

5.8 ***Allegations Against Members of Staff***

*5.8.1.* All allegations of abuse made against a member of staff (including supply teachers and volunteers) in relation to a student must be brought to the attention of the Head of Site and where appropriate, the Executive Director Safeguarding and/or CEO immediately. The Head of Site will act in a co-ordinating role. Please refer to Allegations of Abuse Made Against Staff Policy.

*5.8.2.* In the event the Head of Site is the subject of the allegation, the DSL will report to the CEO, if the CEO is the subject of the allegation the DSL will report to the Chair of Trustees immediately to establish (as outlined in Keeping Children Safe In Education September 22) 'the nature, content and context of the allegation' and agree the appropriate course of action. In some cases, allegations may be so serious that they will require immediate intervention by the police and/or children's social care services.

*5.8.3.* If the allegation against a teacher or member of staff (including supply teachers and volunteers) meets any of the following criteria, the Head of Site (or other lead person) must report it to the Local Authority Designated Officer (LADO) the same day:

    5.8.3.1. They have behaved in a way that has harmed a child, or may have harmed a child.

    5.8.3.2. They possibly committed a criminal offence against or related to a child.

    5.8.3.3. They have behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

    5.8.3.4. They've behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.

*5.8.4.* For other allegations, the Head of Site and Executive Director Safeguarding/CEO will decide if further enquiries are required prior to referral to the Local Authority Designated Officer.

*5.8.5.* Where the Head of Site considers that a referral may be warranted under Child Protection Procedures and an allegation appears to meet the criteria, the Head of Site will inform the Local Authority's Designated Officer.

*5.8.6.* The Local Authority's Designated Officer (LADO) must be informed of all allegations that come to any of our school's attention that meet the criteria, so that he/she can consult the police and social care colleagues as appropriate. The Local Authority Designated Officer should also be informed of any allegations that are made directly to the police or to children's social care. All alleged physical injuries must be investigated by the appropriate external agencies. Where appropriate, the individual school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

5.9 **Low Level Concerns about Staff**

*5.9.1.* All low level concerns about a member of staff (including supply teachers and volunteers) in relation to a student must be brought to the attention of the Designated Safeguarding Lead or Head of Site. The Head of Site will act in a co-ordinating role. Please refer to the Low Level Concerns Policy.

*5.9.2.* It is important that low-level concerns are shared with the Head of Site or a site based Designated Safeguarding Lead as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it should also be emphasised that it is never too late to share a low- level concern.

*5.9.3.* **Low-level concern:** A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

*5.9.4.* A low-level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

5.9.4.1. is not consistent with our Code of Conduct, and/or

5.9.4.2. relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

5.9.4.4. Staff <u>do not</u> need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head of Site

*5.9.5.* Low Level Concerns will be responded to in line with the Low Level Concerns Policy (part of the staff code of conduct)

5.10 **Whistleblowing**

5.10.1. Where a staff member at the Trust feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. Please refer to the Whistleblowing Policy. General guidance on whistleblowing can be found via: www.gov.uk/whistleblowing The NSPCC's "what you can do to report abuse" dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school. Staff can call 0800 028 0285, which is available from 8:00am to 8:00pm, Monday to Friday, and email help@nspcc.org.uk.

5.11 **Training for staff**

5.11.1. The Trust ensures all staff complete safeguarding and child protection training as part of their induction. The Trust also has a commitment to updating training for all staff each year and for appropriate staff to attend Local Authority and Inter-Agency Safeguarding Board Meetings.

5.11.2. To achieve this:

5.11.2.1. Time will be given to enable this commitment to be met.

5.11.2.2. The Designated Safeguarding Lead (DSL) and Deputy DSL will receive relevant training every two years

5.11.2.3. All staff and volunteers new to the Trust will be given appropriate online safeguarding training as part of their induction programme to the Trust. Updates will feature regularly in all staff and SLT meetings, as appropriate.

5.11.2.4. All Trust staff and Governing Body members and Trustees will undertake the training at least every year as organised by the Executive Director Safeguarding and Executive Director Training.

5.11.2.5. Newly recruited staff will complete the online training as part of their induction and will receive site-specific training, including being made aware of local risk factors for extremism.

5.11.2.6. The DSL will attend Local Authority and other training courses as necessary and other appropriate inter-agency training every two years.

5.11.2.7. The DSL will attend Prevent training (WRAP) as provided by the Home Office and Local Authority.

5.12 **Suitability of staff and safe recruitment practices**

5.12.1. The Trust recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff (including supply teachers) and volunteers working at the Trust are suitable to do so and therefore do not pose any kind of risk to our students. Please refer to Safer recruitment Policy.

*5.12.2.* Appropriate members of SLT, Governors, and other relevant staff are required to complete Safer Recruitment Training in order to ensure that one panel member on every selection panel is trained is 'Safer Recruitment.

5.13 **Prevent Duty – Safeguarding students who are vulnerable to extremism.**

*5.13.1.* The Trust follows the statutory guidance to fulfil our Prevent Duty. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

*5.13.2.* The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism.

*5.13.3.* It is rare for children to become involved in terrorist activity. However, some students from an early age can be exposed to terrorist and extremist influences or prejudiced views. Consequently, the Trust takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

*5.13.4.* In line with both the fundamental British Values and the School Values, the following key principles underpin the community in which each school is based:

5.13.4.1. Inclusion.
5.13.4.2. Tolerance.
5.13.4.3. Freedom of speech.
5.13.4.4. The expression of beliefs and ideology.

*5.13.5.* Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

*5.13.6.* Free speech is subject to treating others with respect, understanding differences, equality, an awareness of human rights, community safety, and community cohesion. The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable.

*5.13.7.* The Trust is committed to working with the local authority and other local partners, families, and communities to play a key role in ensuring young people and our communities are safe from the threat of terrorism. The DSL will keep up to date with all local policies and procedures relating to Prevent.

*5.13.8.* Staff must consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care.

5.14 *Visiting speakers*

*5.14.1.* Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, a school may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

*5.14.2.* Visiting speakers, whilst on a school site, will be supervised by a Trust employee. On attending one of our schools visiting speakers will be required to show an original current identification document that includes a photograph, such as a passport or photo card driving licence. The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

5.15 Reducing risks of extremism

*5.15.1.* The Head of Site and the Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk.

*5.15.2.* Actions will include consideration of:
5.15.2.1. The school's RE curriculum.
5.15.2.2. Relationship Education (for all primary pupils) and Relationship and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools.
5.15.2.3. SEND policy.
5.15.2.4. Assembly content

*5.15.3.* Risk assessments will include:
5.15.3.1. The use of Trust premises by external agencies.
5.15.3.2. Integration of students by gender and SEND.
5.15.3.3. Anti-bullying policy.
5.15.3.4. Other issues specific to each school's profile and community.

*5.15.4.* There is no single way of identifying an individual who is likely to be susceptible to a terrorist/radical ideology. As with managing other safeguarding risks, all Trust staff will be vigilant to changes in students' behaviour which could indicate that they may be in need of help or protection.

*5.15.5.* It is commonly recognised that children at risk of radicalisation may display changes in behaviour, show different signs or seek to hide their views. Staff are advised to use their professional judgement in identifying students who might be at risk of radicalisation and always act proportionately and seek support if they are concerned.

*5.15.6.* The Trust recognises that the Prevent duty does not ask teachers to carry out unnecessary intrusions into family life, but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

5.16 ***Potential signs of radicalization and extremism***

*5.16.1.* There is no limit to the signs that you might notice – every student is different. However, some of the indicators staff should look out for include:
5.16.1.1. **Vulnerability:** identity crisis, personal crisis, migration, unmet aspirations, and history of criminality.

5.16.1.2. **Access to extremist influences:** friendship groups, internet activity, activities abroad i.e. military camps, and vocalised support of illegal or extremist/militant groups.

5.16.1.3. **Experiences and influences:** social rejection, personal impact from civil unrest and wide spread media coverage of international events, change in appearance and behaviour, family conflict over religious reviews, and verbal or written evidence of support for terrorist activities.

5.16.1.4. **Travel:** pattern of regular extended travel, evidence of falsifying identity documents, and unexplained absences.

5.16.1.5. **Social factors:** disadvantaged background, lack of empathy and/or affinity with others, severe learning difficulties or mental health, being a child of a foreign national or refugee, experience of trauma or sectarian conflict, and extremist views of a significant other.

*5.16.2.* It is always worth remembering that numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most children or young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation. For example, they may address mental health, relationship, or drug/alcohol issues.

## 5.17 **Response**

*5.17.1.* The Trust will appoint a Prevent Single Point of Contact (SPOC) (Executive Director Safeguarding) to be the lead within the Trust for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

## 5.18 *SPOC Responsibilities*

*5.18.1.* Raising Awareness

*5.18.2.* The Prevent Single Point of Contact (SPOC) role is to raise awareness in relation to all aspects of Prevent and the counterterror agenda generally. They also promote the necessity to safeguard vulnerable children and adults from being exploited and recruited into violent extremism. It is expected that the SPOC will ensure that staff are aware of the role and its responsibilities.

*5.18.3.* SPOCs are also expected to provide advice and guidance to staff within their school. The Channel coordinators have a range of training packages available to help raise awareness. The aim of training the trainers is to streamline the safeguarding agenda and give everyone the necessary knowledge.

*5.18.4.* Receiving Referrals

5.18.4.1. It is expected that if a staff member within the Trust identifies an individual vulnerable to radicalisation, they will contact the SPOC and/or DSL first to discuss the case internally. They should be asked to record their concerns and raise it, as they would with any other safeguarding concern, with the Local

Authority. If deemed suitable, the staff member will be asked to complete the Referral and Assessment Form (RAF). This should then be emailed to the Channel coordinator at: channel.project@gmp.police.uk

5.18.4.2. The Channel Officer will then carry out an extensive risk assessment that aims to identify known risks and additional vulnerabilities. At no point will the person be recorded on a criminal records system as a result of being involved in this process. The coordinator will then complete a case summary and return it to both the SPOC and the staff member.

5.18.4.3. The SPOC should then arrange a multi-agency safeguarding meeting with the necessary professionals to support the vulnerable individual. Channel can assist this process by using our list of SPOCs from other agencies to help ensure the right people are brought to the multi-agency meeting.

5.18.4.4. Please refer to LA contacts at the beginning of this policy.

5.18.4.5. In addition to the above, links with the local Channel lead can be made by the DSL and where necessary, individual cases will be referred to the local Channel panel for screening and assessment.

5.18.4.6. More information on Channel Programme: https://www.gov.uk/government/publications/channel-guidance

5.19 *Training*
    *5.19.1.* The Trust will ensure that all DSLs and the SPOC complete a local Workshop to Raise Awareness of Prevent (WRAP) and that this training will be cascaded to staff as part of the annual CPD training programme. This will be the responsibility of the DSL/SPOC

5.20 **Safeguarding students who are vulnerable to exploitation, child sexual exploitation, honour based abuse (including forced marriage and female genital mutilation) and at risk from or involved with violent crime and <mark>child-on-child</mark> abuse.**
    *5.20.1.* All staff at the Trust will be provided with an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sexting (also known as youth produced sexual imagery) put children in danger.

5.21 *Children Missing From Education*

    5.21.1.1. All staff should be aware that children who go missing from education, 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 can also be a sign of child criminal exploitation including involvement in county lines.

    5.21.1.2. It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital

mutilation, or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to prevent the risks of a child going missing in future. All staff should be aware of Children Missing Education procedures, which are set out in Children Missing Education Policy.

5.22 *Child Criminal Exploitation*

5.22.1.1. 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.

5.22.1.2. 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.

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

5.22.1.4. Staff should make themselves aware of issues surrounding County Lines.

5.22.1.5. How do you know if County Lines drug dealing is happening in your area?
    *5.22.1.5.1.* Some signs to look out for include:
    *5.22.1.5.2.* An increase in visitors and cars to a house or flat.
    *5.22.1.5.3.* New faces appearing at the house or flat.
    *5.22.1.5.4.* New and regularly changing residents (e.g. different accents compared to local accent).
    *5.22.1.5.5.* Change in resident's mood and/or demeanour (e.g. secretive/ withdrawn/ aggressive/ emotional).
    *5.22.1.5.6.* Substance misuse and/or drug paraphernalia.
    *5.22.1.5.7.* Changes in the way young people you might know dress.
    *5.22.1.5.8.* Unexplained, sometimes unaffordable new things (e.g. clothes, jewellery, cars etc).
    *5.22.1.5.9.* Residents or young people you know going missing, potentially for long periods of time.

       *5.22.1.5.10.* Young people seen in different cars/taxis driven by unknown adults.

       *5.22.1.5.11.* Young people seeming unfamiliar with your community or where they are.

       *5.22.1.5.12.* Truancy, exclusion, and disengagement from school.

       *5.22.1.5.13.* An increase in anti-social behaviour in the community.

       *5.22.1.5.14.* Unexplained injuries.

5.22.1.6. All staff should be aware of the associated risks and understand the measures in place to manage these.

5.22.1.7. All staff at the Trust will be made aware of the indicators that may signal children are at risk from, or are involved with, serious violent crime.

5.22.1.8. Signs may include:

       *5.22.1.8.1.* Increased absence.
       *5.22.1.8.2.* Change in friendships.
       *5.22.1.8.3.* New relationships with older individuals or groups.
       *5.22.1.8.4.* A significant decline in performance.
       *5.22.1.8.5.* Signs of self-harm.
       *5.22.1.8.6.* Significant change in wellbeing.
       *5.22.1.8.7.* Signs of assault.
       *5.22.1.8.8.* Unexplained injuries.
       *5.22.1.8.9.* Unexplained gifts or new possessions.

5.22.1.9. These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

5.22.1.10. Indicators of CCE can include a child:
       *5.22.1.10.1.* Appearing with unexplained gifts or new possessions.
       *5.22.1.10.2.* Associating with other young people involved in exploitation.
       *5.22.1.10.3.* Suffering from changes in emotional wellbeing.
       *5.22.1.10.4.* Misusing drugs and alcohol.
       *5.22.1.10.5.* Going missing for periods of time or regularly coming home late.
       *5.22.1.10.6.* Regularly missing school or education.
       *5.22.1.10.7.* Not taking part in education.

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

5.22.1.12. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is

also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

5.23 **Child Sexual Exploitation (CSE)**

5.23.1.1. Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

5.23.1.1.1. in exchange for something the victim needs or wants, and/or

5.23.1.1.2. for the financial advantage or increased status of the perpetrator or facilitator

5.23.1.2. The victim may have been sexually exploited even if the activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

5.23.1.3. CSE can occur over time or be a one-off occurrence.

5.23.1.4. The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation

5.23.1.5. Signs include:

5.23.1.5.1. Underage sexual activity.

5.23.1.5.2. Inappropriate sexual or sexualised behaviour.

5.23.1.5.3. Sexually risky behaviour, 'swapping' sex.

5.23.1.5.4. Repeat sexually transmitted infections.

5.23.1.5.5. In girls, repeat pregnancy, abortions, and miscarriage.

5.23.1.5.6. Receiving unexplained gifts or gifts from unknown sources.

5.23.1.5.7. Having multiple mobile phones and worrying about losing contact via mobile.

5.23.1.5.8. Having unaffordable new things (clothes, a mobile phone, etc.) or expensive habits (alcohol, drugs, etc.).

5.23.1.5.9. Changes in the way they dress.

5.23.1.5.10. Going to hotels or other unusual locations to meet friends.

5.23.1.5.11. Seen at known places of concern (e.g. brothels).

5.23.1.5.12. Moving around the country, appearing in new towns or cities, not knowing where they are.

5.23.1.5.13. Getting in/out of different cars driven by unknown adults.

5.23.1.5.14. Having older boyfriends or girlfriends.

5.23.1.5.15. Contact with known perpetrators.

5.23.1.5.16. Involved in abusive relationships, intimidated, and fearful of certain people or situations.

5.23.1.5.17. Hanging out with groups of older people, or anti-social groups, or with other vulnerable children.

5.23.1.5.18. Associating with other young people involved in sexual exploitation.

> 5.23.1.5.19. Recruiting other young people to exploitative situations.
>
> 5.23.1.5.20. Truancy, exclusion, disengagement with school opting out of education altogether.
>
> 5.23.1.5.21. Unexplained changes in behaviour or personality (chaotic, aggressive, sexual, etc.).
>
> 5.23.1.5.22. Mood swings, volatile behaviour, emotional distress.
>
> 5.23.1.5.23. Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
>
> 5.23.1.5.24. Drug or alcohol misuse.
>
> 5.23.1.5.25. Getting involved in crime.
>
> 5.23.1.5.26. Police involvement, police records.
>
> 5.23.1.5.27. Involved in gangs, gang fights, gang membership.
>
> 5.23.1.5.28. Injuries from physical assault, physical restraint, sexual assault.

## 5.24 Serious violence

5.24.1.1. The indicators, which may signal children are at risk from, or are involved with serious violent crime, that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation include:

> 5.24.1.1.1. increased absence from school,
>
> 5.24.1.1.2. a change in friendships or relationships with older individuals or groups,
>
> 5.24.1.1.3. a significant decline in performance,
>
> 5.24.1.1.4. signs of self-harm or a significant change in wellbeing, or
>
> 5.24.1.1.5. signs of assault or unexplained injuries.
>
> 5.24.1.1.6. Unexplained gifts or new possessions

5.24.1.2. There are range of risk factors which increase the likelihood of involvement in serious violence:

> 5.24.1.2.1. being male,
>
> 5.24.1.2.2. having been frequently absent or permanently excluded from school,
>
> 5.24.1.2.3. having experienced child maltreatment
>
> 5.24.1.2.4. having been involved in offending, such as theft or robbery.

## 5.25 Mental Health

5.25.1.1. 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.

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

5.25.1.3. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these

children's experiences, can impact on their mental health, behaviour, and education.

5.26 **Honour-based Abuse: Forced Marriage (FM)**

5.26.1.1. This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence.

5.26.1.2. Young men and women can be at risk in affected ethnic groups. Evidence shows that the issue of forced marriage affects certain sectors of communities, typically girls in the age range of 14 – 16 years old originating from Pakistan, India, and Bangladesh (approx. 60% of the cases) together with a percentage of cases of children originating from the Middle-East and African countries.

5.26.1.3. A signal of FM is the removal of the students from school and lengthy absence which is often unexplained. Other indicators may be detected by changes in adolescent behaviours. Whistleblowing may come from younger siblings.

5.26.1.4. Any member of staff at the Trust with any concerns should report this immediately to the DSL, who should raise the concern with the Local Police Safeguarding Unit by email or phone. Never attempt to intervene directly as a school or through a third party. Whilst the onus of the investigation for criminal offences will remain  with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child protection responsibilities.

5.26.2. **Honour-based Abuse: Female Genital Mutilation (FGM)**

5.26.2.1. There is a specific legal duty on teachers regarding FGM. If, during the course of their work, a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, then they must report it to the police. All staff at the Trust will recognise this responsibility.

5.26.2.2. The 'One Chance' rule.

5.26.2.3. As with Forced Marriage, there is the 'One Chance' rule regarding FGM. This refers to staff potentially only having one chance to speak to a potential victim and thus may only have one chance to save a life. It is essential that the school takes action without delay.

5.26.3. What is FGM?

5.26.3.1. Female genital mutilation involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

5.26.3.2. Why is it carried out?

5.26.3.3. It is often based on a belief that FGM:
       5.26.3.3.1. Brings status/respect to the girl – social acceptance for marriage.

| | |
|---|---|
| *5.26.3.3.2.* | Preserves a girl's virginity. |
| *5.26.3.3.3.* | Is part of being a woman/rite of passage. |
| *5.26.3.3.4.* | Upholds family honour. |
| *5.26.3.3.5.* | Cleanses and purifies the girl. |
| *5.26.3.3.6.* | Gives a sense of belonging to the community. |
| *5.26.3.3.7.* | Fulfils a religious requirement. |
| *5.26.3.3.8.* | Perpetuates a custom/tradition. |
| *5.26.3.3.9.* | Helps girls be clean/hygienic. |
| *5.26.3.3.10.* | Is cosmetically desirable. |
| *5.26.3.3.11.* | Is mistakenly believed to make childbirth easier. |

5.26.3.4. FGM IS A CRIMINAL OFFENCE. There is no justification for this procedure.

5.26.3.5. All staff at the Trust will be made aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM.

5.26.3.6. All teachers have a mandatory responsibility to report FGM if they discover it (through disclosure not physical examination) to the police and informing the DSL immediately.

5.26.3.7. Circumstances and occurrences that may point to FGM happening include:

| | |
|---|---|
| *5.26.3.7.1.* | The child talking about getting ready for a special ceremony. |
| *5.26.3.7.2.* | The child and their family taking a long trip abroad. |
| *5.26.3.7.3.* | The child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghani, Kurdistan, Indonesia, and Pakistan). |
| *5.26.3.7.4.* | Knowledge that the child's sibling has undergone FGM. |
| *5.26.3.7.5.* | The child talking about going abroad to be 'cut' or to prepare for marriage. |
| *5.26.3.7.6.* | Signs that may indicate a child has undergone FGM: |
| *5.26.3.7.7.* | Prolonged absence from school and other activities. |
| *5.26.3.7.8.* | Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued. |
| *5.26.3.7.9.* | Bladder or menstrual problems. |
| *5.26.3.7.10.* | Finding it difficult to sit still and looking uncomfortable. |
| *5.26.3.7.11.* | Complaining about pain between the legs. |
| *5.26.3.7.12.* | Mentioning something somebody did to them that they are not allowed to talk about. |
| *5.26.3.7.13.* | Secretive behaviour, including isolating themselves from the group. |
| *5.26.3.7.14.* | Reluctance to take part in physical activity. |
| *5.26.3.7.15.* | Repeated urinal tract infection. |

> 5.26.3.7.16. Disclosure.

5.26.3.8. Further guidance and information are available from:
**NSPCC FGM Helpline**
Contact days and times: **24 hours**
Tel: **0800 028 3550**
Email: **fgmhelp@nspcc.org.uk**

## 5.27 Child-on-child abuse

*5.27.1.* All staff at the Trust will be made aware that children can abuse other children (referred to as child-on-child). It can happen both inside and outside of school or college and online. It is important to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

*5.27.2.* Even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

*5.27.3.* It is essential to understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

*5.27.4.* child-on-child abuse is most likely to include, but may not be limited to:
  5.27.4.1. Bullying (including cyberbullying).
  5.27.4.2. Physical abuse such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
  5.27.4.3. Sexual violence, such as rape, assault by penetration, and sexual assault.
  5.27.4.4. Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
  5.27.4.5. abuse in intimate personal relationships between children
  5.27.4.6. 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;
  5.27.4.7. Upskirting, which is a form of abuse that has been high on school and court agendas for a number of years and is a criminal offence in its own right under the Voyeurism (Offences) Act 2019. Upskirting occurs when someone takes a picture under a person's clothing, with or without underwear, without them knowing or without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm. It is a common aspect of child-on-child abuse and can happen to any  gender.
  5.27.4.8. consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
    *5.27.4.8.1.* Initiation/hazing type violence and rituals.

5.27.5.  **Procedures for dealing with allegations of child-on-child abuse.** If a pupil makes an allegation of abuse against another pupil:

5.27.5.1. 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

5.27.5.2. The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

5.27.5.3. The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

5.27.5.4. If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation

5.27.6.  **Procedures for dealing with Sharing of nudes and semi-nudes ('sexting') If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.**

5.27.7.  You must **not**:

5.27.7.1. 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)

5.27.7.2. Delete the imagery or ask the pupil to delete it

5.27.7.3. Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

5.27.7.4. Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

5.27.7.5. Say or do anything to blame or shame any young people involved

5.27.7.6. 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.

5.27.8.  Following a report of an incident, the DSL determine:

5.27.8.1. Whether there is an immediate risk to pupil(s)

5.27.8.2. If a referral needs to be made to the police and/or children's social care

5.27.8.3. 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)

5.27.8.4. What further information is required to decide on the best response

5.27.8.5. Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

5.27.8.6. Whether immediate action should be taken to delete or remove images or videos from devices or online services

5.27.8.7. Any relevant facts about the pupils involved which would influence risk assessment

5.27.8.8. If there is a need to contact another school, college, setting or individual

5.27.8.9. Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

5.27.8.11. The incident involves an adult

5.27.8.12. 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)

5.27.8.13. 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

5.27.8.14. The imagery involves sexual acts and any pupil in the images or videos is under 13

5.27.8.15. 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)

5.27.8.16. 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.

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

5.27.8.18. 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.

5.27.9. **Informing parents/carers**

5.27.9.1. 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.

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

*5.27.11.* 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.

*5.27.12.* To achieve this, we will:

5.27.12.1. Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

5.27.12.2. 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

5.27.12.3. Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

5.27.12.4. Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

5.27.12.5. Ensure staff reassure victims that they are being taken seriously

5.27.12.6. Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

5.27.12.7. Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

5.27.12.8. Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

5.27.12.9. The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

5.27.12.10. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

*5.27.12.10.1.* Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this

*5.27.12.10.2.* There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

**1.1  Procedure for students who are vulnerable to exploitation, child sexual exploitation, honour based abuse (including forced marriage and female genital mutilation) and at risk from or involved with violent crime and child-on-child abuse.**

*5.27.13.* Where risk factors are present but there is no evidence of a particular risk, the DSL at the Trust will advise staff on preventative work that can be done within the school to engage the student into mainstream activities and social groups.

*5.27.14.* The DSL may well be the person who talks to the student's family where appropriate, sharing the school's concern about the student's vulnerability and how the family and school can work together to reduce the risk.

*5.27.15.* In this situation, depending on the level of concern and agreement with the parent and the student (as far as possible):

5.27.15.1. The DSL can decide to notify the Multi-Agency Safeguarding Hub (MASH) of the decision so that a strategic overview can be maintained and any themes or common factors can be recognised; and

5.27.15.2. The school will review the situation after taking appropriate action to address the concerns.

*5.27.16.* The DSL will also offer and seek advice about undertaking an early help assessment and/or making a referral to Social Services or involving the LA Children's Safeguarding Partnership. If the concerns about the student are significant and meet the additional needs/complex need criteria, he/she will be referred to the MASH. This includes concerns about a student who is affected by the behaviour of a parent or other adult in their household

5.28 *Attendance*

*5.28.1.* All students, regardless of their circumstances or background, are entitled to full-time education that is suitable to their age, ability, aptitude, and any special educational needs and disabilities.

*5.28.2.* The Trust operates a strong attendance tracking system that is overseen by a member of the leadership team of each school. The tracking and use of effective attendance management strategies enables the schools across the Trust to ensure each day that every child is accounted for.  (See  Pupils' Admission & Attendance Register and Children Missing Education Policies)

*5.28.3.* The Trust takes a range of actions to tackle Persistent Absentees and completes official reports on children who are persistently absent from school.

*5.28.4.* The Trust will only authorise leave of absence in exceptional circumstances. The Head of Site, or Deputy in their absence, will determine the length of time that the child can be away from the school.

*5.28.5.* The Trust recognises that some children seeking leave of absence are vulnerable to risk of abuse, neglect, or travelling to conflict zones, or at risk of FGM or forced marriage.

5.28.6. Attendance staff are trained to look out for these triggers and each school works in partnership with the Local Authority to ensure localised risks are particularly taken note of and shared with all staff. Staff who have pastoral responsibility undergo training on attendance and safeguarding issues on an annual basis.

5.28.7. Where this is identified, staff should alert the DSL and Head of Site. The DSL will, as soon as a concern is established, alert the Local Authority.

5.28.8. As a matter of course: student absence must be followed up on a daily basis – this must be a priority. Unless circumstances indicate that a student is at risk and immediate action is necessary, the Local Authority will be informed of every student who has a continuous period of unexplained absence of three days or more.

5.28.9. The admissions register at each school is kept up to date and the Local Authority is informed of all students who are removed from the school roll when they:
5.28.9.1. Have been taken out of school by their parents and are being educated outside the school system e.g. home education.
5.28.9.2. Have ceased to attend school and no longer live within reasonable distance of the school at which they are registered.
5.28.9.3. Have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age.
5.28.9.4. Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period.
5.28.9.5. Have been permanently excluded.

5.28.10. The local authority will be informed as soon as the grounds for deletion are met, in line with the local authority guidelines, but no later than at the point of deleting the student's name from the roll.

5.28.11. No student will be removed from a school roll until all safeguarding checks have been completed or the whereabouts of a student have been established

5.29 **Domestic Abuse**
5.29.1. Domestic violence and abuse refer to any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality.
5.29.2. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.
5.29.3. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to

parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

*5.29.4. Operation Encompass*

This initiative helps police and schools work together to provide emotional and practical help to children who have been involved in domestic abuse. When the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) before the child or children arrive at school the following day. This ensures that the school has up to date and relevant information about the child's circumstances and can enable support to be given to the child according to their needs. DSLs should endeavour to alert relevant pastoral support staff as soon as possible where this is appropriate.

*5.29.5.* Police forces not signed up to operation encompass will have their own arrangements in place.

5.30 **Online Safety**

*5.30.1.* The Trust's E-Safety Policy can be found on each school website or upon request. All staff are aware of the contents.

*5.30.2.* The E-safety Policy and related policies must be read alongside this document and in conjunction with the DfE guidance: Teaching on-line safety in schools, 2019.

*5.30.3.* Children must be safeguarded from potentially harmful and inappropriate online material. As such, the Trust ensure appropriate filters and appropriate monitoring systems are in place.

*5.30.4.* Online safety is included in our curriculum provision (E-Safety Award) and ensures children are taught about safeguarding, including online, through teaching and learning opportunities. This may include covering relevant issues through a variety of lessons and learning opportunities.

*5.30.5.* Although appropriate blocking is essential, it does not restrict our students learning or lead to unreasonable restrictions as to what our students can be taught with regards to online teaching and safeguarding. This policy sets out specific measures that ensure students in the Trust work safely, including protection from terrorist or extremist material, child-on-child abuse, and bullying via online platforms, including sexting.

5.31 **Opportunities to teach safeguarding**

*5.31.1.* The Trust will ensure that children are taught about safeguarding. This may include covering relevant topics through learning in general but is covered particularly in Relationships Education and Relationships and Sex Education See RSE Policy document for further details. The subject of Relationships and Sex education is mandatory from Summer Term 2021

5.32 **Looked after children and previously looked after children**

*5.32.1.* All staff in the Trust will have an awareness of issues around safeguarding looked after children and previously looked after children. The leadership team will ensure that staff have the skills, knowledge, and understanding necessary to keep looked after children and previously looked after children safe.

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

*5.32.3.* The Head of Site will appoint a Designated Teacher (DSL) to promote the educational achievement of students who are looked after and to ensure that this person has appropriate training.

### 5.33 Liaison with the virtual Head

*5.33.1.* Virtual school heads receive pupil premium plus additional funding based on the latest published numbers of children looked after in the authority.

*5.33.2.* Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

*5.33.3.* They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

*5.33.4.* Each school's Designated Teacher for looked after children will work with the virtual school head to monitor the child's welfare and discuss how funding can be best used to support the progress of the child and meet the needs identified in the student's personal education plan.

### 5.34 *Pupils with a social worker*

*5.34.1.* We recognise that children with social workers can need extra support. A child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behavior and mental health.

*5.34.2.* The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

*5.34.4.* Responding to unauthorised absence or missing education where there are known safeguarding  risks.

*5.34.5.* The provision of pastoral and/or academic support.

5.35 ***Confidentiality and Record Keeping***
*5.35.1.* Staff at the Trust have a professional responsibility to share relevant information about the protection of children with the DSL and potentially external investigating agencies, where possible, under the guidance of the DSL. DSLs are the most likely staff to have the fullest picture of a child.

*5.35.2.* 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

*5.35.3.* If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

5.35.3.1. There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

5.35.3.2. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

*5.35.4.* The DSL should consider that:

5.35.4.1. Parents or carers should normally be informed (unless this would put the victim at greater risk)

5.35.4.2. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

5.35.4.3. Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

*5.35.5.* Regarding anonymity, all staff will:

5.35.5.1. Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

5.35.5.2. Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

5.35.5.3. Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

*5.35.6.* All staff must use the CPOMS online recording system to record all child protection, welfare concerns and discussions. Decisions made will be actioned on CPOMS.

*5.35.7.* The CPOMS entry must be recorded within 24 hours of the incident/conversation occurring and be concise and accurate using descriptive language, words used by the child, questions asked, responses given by staff and any follow up actions. Do not state your opinion or thoughts. If you are in any doubt about whether to record something, discuss it with the DSL. CPOMS will be used to record all significant interactions with parents and the pupil and staff will be able to 'tag' the report of an incident if they have any potential safeguarding concerns.

*5.35.8.* Records should include
    *5.35.9.* a clear and comprehensive summary of the concern;
    *5.35.10.* details of how the concern was followed up and resolved;
    *5.35.11.* a note of any action taken, decisions reached and the outcome.

*5.35.12.* A paper version of the CPOMS incident log will be made available to short-term temporary staff, visitors and contractors and this, once completed, must be handed to the DSL or Family Multiagency link worker for entry into the digital CPOMS system. Any incidents logged on CPOMS that give rise to any form of safeguarding concern will alert the DSL and deputies. In this way the DSL will be able to spot patterns of incidents and/or link incidents to previous information from interactions with the pupil and their family in order to better assess the level of concern or need represented. CPOMS records should be concise and factual, avoiding unnecessary extra information and paying attention to correct use of spelling and grammar.

*5.35.13.* CPOMS ensures an individual file is created as necessary for children with Safeguarding concerns and maintains a chronology of significant incidents for each child with safeguarding concerns.

*5.35.14.* CPOMS ensures that such records are kept confidentially and securely and separate from the child's educational record. When a child joins one of our schools, the DSL will request the transfer of any safeguarding information prior to starting at school. When a child leaves one of our schools, the DSL will make contact with DSL at the new educational establishment and will ensure that the child protection file is forwarded to them in an appropriately agreed manner, ==within 5 days for an in-year transfer or within the first 5 days of start of a new term==. Where the educational institution that the pupil is coming from, or going to, uses CPOMS the pupil's entire CPOMS history can be transferred digitally. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving educational establishment and/or evidence of recorded delivery.

*5.35.15.* Confidential information and records will be held securely on CPOMS. Information from child protection files will only be shared with relevant staff when it is necessary to do so and in a manner that is consistent with data protection law.

*5.35.16.* If a school receives a request for direct access to, or copies of, school documentation held on a Child Protection file, the Head of Site and DSL will be informed and a decision taken on the appropriate way forward in accordance with the Data Protection Policy. It may be that

the Trust's Data Protection Officer will be consulted or further legal advice sought.

5.35.17. In the event of a student who is being dealt with under the Trust's child protection procedures transferring to another school, their school will:
5.35.17.1. Find out the name of the receiving school (and, where appropriate, the Local Authority).
5.35.17.2. Contact the relevant member of staff at that school to discuss the transfer.
5.35.17.3. Securely send all information relating to the student to the receiving school (and, where relevant, the Local Authority).
5.35.17.4. Check with the receiving school that the student has actually arrived there on the expected day (and inform all relevant agencies of the transfer).

5.35.18. Any external individual or organisation contracted by the Trust to work with our students must report any child protection incidents or disclosures from students to the Head Teacher or DSL at the earliest opportunity. Such bodies will, as part of their contractual arrangements with the Trust, be required to work in accordance with the Trust's child protection and safeguarding policy. The Trust has in place data sharing agreements and complies with all relevant data sharing protocols.

5.35.19. Safeguarding records relating to individual children will be retained for 7 years after they have left the Trust and kept securely within school in our Archives room in line with New Bridge Storage and Retention policy

5.36 **Working with parents/individuals with parental responsibility**
5.36.1. The Trust recognises the importance of working, where appropriate, in partnership with parents and carers to ensure the welfare and safety of our students

5.36.2. Each school will therefore:
5.36.2.1. Make parents aware of the school's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on, where necessary, by making all policies available on the website and on request.
5.36.2.2. Work with parents to support the needs of their child.
5.36.2.3. Consider the safety of the student and, should a concern arise, the Designated Safeguarding Lead (DSL) has the responsibility to seek advice prior to contacting parents.
5.36.2.4. Concerns will be discussed parents prior to a referral unless doing so may jeopardise a police investigation.
5.36.2.5. Aim to help parents understand that the school has a responsibility for the welfare of all students and has a duty to refer cases to the Local Authority in the interests of the student as appropriate.
5.36.2.6. Ensure a robust complaints system is in place to deal with issues raised by parents and carers.
5.36.2.7. Provide advice and signpost parents and carers to other services where students need extra support.

5.37 **Health and Safety**
5.37.1. The CEO of the Trust will ensure that there is a robust, up to date Health and Safety Policy and Procedure to meet the statutory

responsibility for the safety of students and staff at the Trust. The Head of Site will identify and manage health and safety through the use of risk assessments, which are carried out:

5.37.2. On an annual basis for each school's learning spaces and environment in and outdoors.
5.37.2.1. For all school trips and educational visits.For students
5.37.2.2. travelling between locations during the school day.
5.37.2.3. For all work-based learning on work experience placements.
5.37.2.4. When a student returns following an exclusion due to risky or violent behaviour.
5.37.2.5. When there are any changes to the premises or practices.
5.37.2.6. Following a serious accident in relation to staff and/or students.
5.37.2.7. When there is a high-level risk associated with contact with parents.
5.37.2.8. To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage

5.37.3. Visitors and contractors will be expected to:
5.37.3.1. Report to the school site reception on arrival.
5.37.3.2. Provide proof of identity.
5.37.3.3. Wear a name badge at all times.
5.37.3.4. Receive suitable supervision by Trust staff when on site.
5.37.3.5. Be made aware of the arrangements for safeguarding and health and safety.
5.37.3.6. Comply with the relevant vetting checks specified through the Trust's recruitment process.

5.37.4. See Visitors Policy

5.38 **Equal Opportunities**
5.38.1. The Trustees and Governing Body must take into account the Equality Impact Scheme 20/21 when discharging their duties under this policy.

5.39 **OFSTED Inspection**
5.39.1. From September 2019, OFSTED's inspections of schools will be carried out under OFSTED's Education Framework. Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective. In addition, Ofsted publishes specific guidance to inspectors.

5.39.2. You can find guidance documents at the following link:

5.39.3. https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills

# 6. Other useful documents

6.1 Administering Medication
6.2 Allegations of Abuse
6.3 Antibullying
6.4 Behaviour policy
6.5 Code of conduct
6.6 Data protection
6.7 Educational Visits

6.8   E Safety
6.9   Exclusions
6.10  First Aid
6.11  H&S
6.12  Intimate Care
6.13  Low Level Concerns
6.14  Manual Handling
6.15  Missing Education
6.16  RPI
6.17  SCR
6.18  Safer Recruitment
6.19  Sick child
6.20  RHSE
6.21  Uncollected Child
6.22  Visitors
6.23  Vulnerable Adults.


7.  **Monitoring**

7.1   This policy will be monitored through the Trust's accountability framework.

7.2   The Designated Safeguarding Lead (DSL) at the Trust will monitor the working of this policy and will report as required to the Head of Site and the nominated Governor. It will be reviewed annually and staff will be consulted.

**Appendix 1 - Staff Guidance**

**Procedures in respect of Child Abuse**

Child abuse exists where children have been physically or emotionally abused or severely neglected. Abuse of children is likely to be noticed by the school staff and Health Workers or Education Welfare Officers. It is essential, therefore, that all  those whose work brings them into contact with children and their families know the signs of child abuse and are aware of the procedures that they must follow to safeguard the child.

Part one of Keeping Children Safe in Education September 22 should be referred to for a list of those children who may be in need of safeguarding support

The Trust has the role of recognising and responding to potential indicators of abuse and neglect. All other action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies are therefore regarded as essential by the Trust.

In the event of an actual or suspected case of child abuse by adults, parents, teachers, or any other adult, it is the responsibility of staff to report this to the Designated Safeguarding Lead (DSL) as soon as possible. The Designated Safeguarding Lead (DSL) is responsible for ensuring that children are identified and the appropriate agency is involved. The Designated Safeguarding Lead (DSL) will attend any reviews called by the Local Authority, and may call on appropriate members of staff for reports. It is important that if staff overhear children discussing 'abuse' or 'neglect' that this information is relayed for investigation. Staff should not assume that somebody else will take action and must share information which might be critical in keeping children safe.

Staff leading off-site visits, particularly residential ones, should provide a list of the students taking part to the Designated Safeguarding Lead (DSL), to ensure that they are made aware of all essential information relating to  the students in their care. A confidential register will be maintained of all those students known to be at risk. Names will be entered on the register if it is confirmed by the Local Authority that the child is actually at risk.

B        Guidance for all staff on dealing with disclosure / suspected abuse / neglect / sexual harassment, sexual assault, violence, honour based abuse (forced marriage and female genital mutilation), children who are at risk from or involved with violent crime and child-on-child abuse

**Dealing with disclosures of abuse**
- Always listen carefully and quietly. Do not press for any evidence at  all.
- Remain calm and reassuring. Do not dismiss the disclosure and do not show distress or concern.
- Do not refute the  allegation.
- Show that you care through open and reassuring facial expressions and body language.
- Do not interrogate or ask leading questions (it could later undermine a  case). Use open questions eg 'TED' Tell, Explain, Describe and '4 Ws' What, Who, Where, When;
- Ensure you take a written verbatim account of the child's  disclosure.
- Staff should be aware that written accounts could become part of a statutory assessment or criminal investigation.
- Where there is an online element, the key consideration is for staff not to view or forward illegal images of a child. Where viewing images is unavoidable, the

following link provides advice on how to respond: https://assets. publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/fi le/759007/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

At this point, staff should take the following steps:
- Explain to the student that the disclosure must be reported – emphasise your Trust in them.
- Do not promise to keep the allegation secret or that 'everything will be alright
- the student by telling them that they have done the right thing in telling you. Do not offer physical reassurance.
- Do not admonish in any way e.g. 'I wish you had told me sooner.'Inform the DSL
- initially verbally.
- Under no circumstances discuss the matter with any other person. If the allegations prove to be untrue, any such discussion would be deemed defamatory. Information to staff is on a 'need to know' basis at the discretion of the DSL.
- If the child agrees, and it is appropriate, take them with you to the DSL.
- With the DSL, prepare a detailed report itemising:
  - The information revealed by the student. It should not contain any opinion whatsoever.
  - Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within the school.
- All staff are under a duty to report all suspicions of abuse to the DSL and record these on CPOMs
- The DSL is responsible for passing on these concerns to Children's Services.
- Accurate records are essential in the event of further investigations.

If you see or hear something that is concerning:
- Don't ignore it or assume that it is someone else's responsibility to report it.
- Upload all information to the school's safeguarding system (CPOMs) and seek advice immediately from your DSL.
- Don't feel silly – if it worries you, someone else needs to know.
- If it is something related to safeguarding, but not a child whose safety is immediately at risk, inform the appropriate Pastoral Manager or safeguarding officer in person and follow up with a one-line email notifying the DSL that there is a safeguarding concern.
- If it is related to a child being at risk, see the DSL or Deputy DSL immediately and definitely before the child goes home that day where possible.
- All staff may raise concerns directly with Children's Services if they feel an incident is not being dealt with appropriately or they are unable to locate relevant staff.
- Concerns about adults in the school should be made directly to the Head of Site.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

- Not recognise their experiences as harmful

- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

**Child Protection Procedures – Points of action**

If anyone discovers or suspects child abuse/ ==child-on-child== sexual violence or sexual harassment, they must inform the DSL. The DSL will, in the appropriate manner and according to procedures, assess the situation.

The DSL will, if appropriate, take the following steps:

- Where there is a report of ==child-on-child== sexual violence, the DSL will make an immediate risk and needs assessment in accordance with part five of Keeping Children Safe in Education 2021 (guidance for this can be found in Appendix 4). Where there is a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

- Where it is clear that a Child Protection Referral (significant harm) is needed, they will contact Social Services without delay.

- Where the DSL is not sure whether it is a Child Protection issue, or where the DSL needs to check the Child Protection register, they may seek advice from the MASH (Multi Agency Safeguarding Board

- They will follow locally agreed protocols which can be found on the Local Authority Children's Safeguarding Partnership website.

The DSL or a delegated child protection officer will attend a Child Protection Conference. We recognise the importance of multi-agency working and will ensure that staff are able to attend all relevant meetings, case conferences, core groups, and strategy meetings. We will provide relevant training and support for staff required to attend any meetings.

**Appendix 2 - Information on child abuse and categories of abuse**

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

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

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

### Children missing from education

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

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

› Are at risk of harm or neglect

› Are at risk of forced marriage or FGM

› Come from Gypsy, Roma, or Traveller families

› Come from the families of service personnel

› Go missing or run away from home or care

› Are supervised by the youth justice system

› Cease to attend a school

› Come from new migrant families

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

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

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

## Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

› Appearing with unexplained gifts or new possessions

› Associating with other young people involved in exploitation

› Suffering from changes in emotional wellbeing

› Misusing drugs and alcohol

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

› Regularly missing school or education

› Not taking part in education

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

## Child sexual exploitation

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

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

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

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

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

› Having an older boyfriend or girlfriend

› Suffering from sexually transmitted infections or becoming pregnant

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

## Child-on-child abuse

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### Domestic abuse

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

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

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

### Homelessness

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

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

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

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

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

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

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

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- › The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- › FGM being known to be practised in the girl's community or country of origin
- › A parent or family member expressing concern that FGM may be carried out
- › A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- › A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

**Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

› Speak to the pupil about the concerns in a secure and private place

› Activate the local safeguarding procedures and refer the case to the local authority's designated officer

› Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

› Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Preventing radicalisation

› **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

› **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

› **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;

- Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

› Refusal to engage with, or becoming abusive to, peers who are different from themselves

› Becoming susceptible to conspiracy theories and feelings of persecution

› Changes in friendship groups and appearance

› Rejecting activities they used to enjoy

› Converting to a new religion

› Isolating themselves from family and friends

› Talking as if from a scripted speech

› An unwillingness or inability to discuss their views

› A sudden disrespectful attitude towards others

› Increased levels of anger

› Increased secretiveness, especially around internet use

› Expressions of sympathy for extremist ideologies and groups, or justification of their actions

› Accessing extremist material online, including on Facebook or Twitter

› Possessing extremist literature

› Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

### 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

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

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

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

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

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

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

Staff should be aware of the importance of:

› Challenging inappropriate behaviours

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

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

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

## Serious violence

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

› Increased absence from school

› Change in friendships or relationships with older individuals or groups

› Significant decline in performance

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

› Signs of assault or unexplained injuries

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

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

› Being male

› Having been frequently absent or permanently excluded from school

› Having experienced child maltreatment

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

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

**Appendix 3 Statutory Duty and Guidance Documents**

This policy sets out how the Trust will meet its statutory duty to safeguard and promote the welfare of our students. It has been developed in accordance with the law and guidance found at https://www.gov.uk/ that seeks to protect children.

Further guidance in relation to the safeguarding topics covered in this policy include:
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges
- Working Together to Safeguard Children
- Multi-agency Statutory Guidance on Female Genital Mutilation
- Teaching Online Safety in Schools
- Information about mandatory reporting of female genital mutilation
- Protecting Children from Radicalisation: the prevent duty
- Prevent Duty Guidance: England and Wales
- Inspecting safeguarding in maintained schools and academies
- Inspecting safeguarding in safeguarding in early years, education and skills settings
- Competence Still Matters: Safeguarding training for all employees and volunteers
- Preventing Youth Violence and Gang Involvement
- Safeguarding in Schools: Best Practice
- Criminal exploitation of children and vulnerable adults: county lines
- Sexual Offences Act
- The Children Act 1989 and 2004 and The Education Act 2002
- Mental Health and Behaviour in Schools: Departmental Advice
- Multi-agency statutory guidance on female genital mutilation
- Sexting in Schools, Aug 2016, UK Council for Internet Safety
- Learning together to be safe - a toolkit to help schools contribute to the prevention of violent extremism
- The Prevent Strategy: A Guide for Local Partners in England

If anyone wishes to seek further information or guidance, they can refer to the above documents.

## Equality Impact Assessment Form

| | | | | | |
|---|---|---|---|---|---|
| **Title of document** | | Enter text here | | | |
| **Organisation / Site** | Enter text here | **Person completing form** | Enter text here | **Date** | Enter date here |

| Does the process affect one group less or more favourably than another on the basis of: | Yes / No |
|---|---|
| **Age** refers to a person belonging to a particular age | enter |
| **Disability** A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. | enter |
| **Gender reassignment** The process of transitioning from one gender to another. | enter |
| **Marriage and civil partnership** Marriage and civil partnership means someone who is legally married or in a civil partnership. Marriage can either be between a man and a woman, or between partners of the same sex. Civil partnership is between partners of the same sex. | enter |
| **Pregnancy and maternity** Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding | enter |
| **Race** Race can mean your colour, or your nationality (including your citizenship). It can also mean your ethnic or national origins, which may not be the same as your current nationality. For example, you may have Chinese national origins and be living in Britain with a British passport. Race also covers ethnic and racial groups. This means a group of people who all share the same protected characteristic of ethnicity or race. | enter |
| **Religion and belief** Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition. | enter |
| **Sex** A man or a woman. | enter |
| **Sexual orientation** Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes. | enter |
| If you have identified potential discrimination, please explain how the exception is valid, legal and/or justified? | |
| enter | |

## To be completed by EIA Lead

| | |
|---|---|
| If potential discrimination has been identified, are the exceptions valid, legal and/or justified? | enter |
| Does this policy / service / procedure need adjusting to remove any disadvantage identified or to better promote equality? | enter |
| Impact Assessment Result (See tool below) | Enter impact result |
| Date assessed. | Enter Date Assessed |

| High Impact | Medium Impact | Low Impact |
|---|---|---|
| The policy or process has a major impact on equality | The policy or process has an impact on equality | The policy or process might have an impact on equality |
| There is significant potential for, or evidence of adverse impact. | There is some evidence to suggest potential for, or evidence of adverse impact. | There is little evidence to suggest that the policy could result in adverse impact |
| The policy has consequences for or affects significant numbers of people | The policy has consequences for or affects some people | The policy has consequences for or affects few people |