



**Child Protection and Safeguarding Policy  
(including safer recruitment,  
allegations against staff and low-level concerns)**

	<b>Document control table</b>
Title	Child Protection and Safeguarding Policy
Date approved	August 2024
Approved by	OA Board of Trustees
Date of next review	July 2025 (unless legislation updates are required earlier)
Updates/revisions included:	<p>In line with KSCIE 2024</p> <p><b>Updated the definitions</b> - Providing help and support to meet the needs of pupils as soon as problems emerge.</p> <p>Protecting pupils from maltreatment, whether that is within or outside the home, including online.</p> <p>Organised the legal framework, statutory and non-statutory guidance used to inform the policy.</p> <p>Added an additional role for the DSL in relation to record keeping (section 6.2)</p> <p>Added additional suggestions under early help (section 8.3)</p> <p>Added the channel helpline contact details and updated contact details</p> <p>Bookmarked the appendices</p> <p>Added links to the policy (once in place)</p> <p>Where applicable, 'abuse and neglect' has been changed throughout the document to 'abuse, neglect and exploitation.'</p>

**All staff should read this policy in its entirety along with KCSIE to ensure they understand the expectations around safeguarding practice in schools and in Olive Academies. All trustees and AAB members should read this policy and KCSIE in its entirety.** Any questions or uncertainties should be directed to the DSL within each academy in the first instance.

## KEY CONTACTS TBC

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Local Authority Designated Officer (LADO)		<a href="mailto:LADO@havering.gov.uk">LADO@havering.gov.uk</a> 01708 431653
Referrals into Early Help and Social Care	MASH Professional Consultation line	<a href="mailto:tmash@havering.gov.uk">tmash@havering.gov.uk</a>  Monday to Friday (9am to 5pm) – 01708
Channel Helpline		020 7340 7264 <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>  In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321

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## 1. Introduction

Our pupils' welfare is our paramount concern. The Olive Academies (OA) Board of Trustees and the academy advisory board (AAB) will ensure that we safeguard and promote the welfare of pupils and work together with other agencies to ensure that we have adequate arrangements to identify, assess and support those children who are suffering or likely to suffer harm.

Our academy is a community and all those directly connected, staff members, trustees and AAB members, parents, families and pupils, have an essential role to play in making it safe and secure. We wish to facilitate a whole school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. All our systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, trustees, AAB members and leaders across the trust should ensure that the child's wishes and feelings are considered when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback.

As a trust which provides education to children in alternative provision, we recognise that our pupils often have complex needs and that we remain aware of the additional risk of harm that our pupils may be vulnerable to. We must take this into account in all our work

Within this document, the term 'staff' should be broadly read as any adult working within the school or trust, whether directly employed, providing a contracted service, a one-off service such as a supply teacher or a volunteer.

## **2. Our ethos and aims**

We believe that our academy should provide a caring, positive, safe and stimulating environment that promotes the welfare, social, physical and moral development of the individual child.

We recognise:

- the importance of providing an environment within our academy that will help children feel safe and respected;
- the importance of enabling children to talk openly and to feel confident that they will be listened to; and
- that all adults within the academy, including permanent and temporary staff, volunteers and AAB members, have a full and active part to play in protecting our pupils from harm.

We will work with parents and carers to build an understanding of the academy's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

At Olive Academies we aim to ensure that:

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

## **3. Legislation and statutory guidance**

### **Legal Frameworks**

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school. This policy also complies with our funding agreement and articles of association.

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- [Sexual Offences Act 2003](#)

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

- [Apprenticeships, Children and Learning Act 2009](#) and Act of parliament, alters the law relating to education
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our trustees; AAB members and heads of academies should consider how they support their pupils with these characteristics. The Act allows our academies to take positive action to deal with 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
- [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

The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)

- [Anti-social Behaviour, Crime and Policing Act 2014](#)
- [Counter-Terrorism and Security Act 2015](#)
- [The UK General Data Protection Regulation \(UK GDPR\)](#)
- [Data Protection Act 2018](#)
- [Voyeurism \(Offences\) Act 2019](#)
- [Domestic Abuse Act 2021](#)
- [Marriage and Civil Partnership \(Minimum Age\) Act 2022](#)

### Statutory guidance

- [Home Office \(2023\) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'](#)
- [DfE \(2023\) 'Working Together to Safeguard Children 2023'](#)
- [DfE \(2018\) 'Disqualification under the Childcare Act 2006'](#)
- [DfE \(2024\) 'Keeping children safe in education 2024'](#)
- [HM Government \(2020\) 'multi-agency statutory guidance on female genital mutilation'](#)
- [HM Government \(2023\) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'](#)
- [Home Office and Foreign, Commonwealth and Development Office \(2023\) 'multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'](#)

## Non-statutory guidance

- [DfE \(2015\) 'What to do if you're worried a child is being abused'](#)
- [DfE \(2017\) 'Child sexual exploitation'](#)
- [DfE \(2024\) 'Information sharing'](#)
- [DfE \(2024\) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'](#)
- [DfE \(2021\) 'Teachers' Standards'](#)
- [DfE \(2024\) 'Recruit teachers from overseas'](#)
- [DfE \(2024\) 'Working together to improve school attendance'](#)
- [DfE \(2024\) 'Meeting digital and technology standards in schools and colleges'](#)
- [Department of Health and Social Care \(2024\) 'Virginity testing and hymenoplasty: multi-agency guidance'](#)

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

This policy and the accompanying procedures have been developed in accordance with statutory guidance and local safeguarding procedures in each local authority where our academies are based and working with the three safeguarding partners.

OA also follows: 'Guidance for safer working practice for those working with children and young people in education settings': <https://saferrecruitmentconsortium.org/>

## 4. Definitions

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

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

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

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

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

**Sharing of nudes and semi-nudes** (also known as sexting, youth produced sexual imagery or pseudo images/videos, which are computer generated images that otherwise appear to be a photograph or video) is where children share nude or semi-nude images, videos or live streams.

**Children** includes everyone under the age of 18.

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

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

**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.

All teaching at the academy follows best practice in delivering safe and effective education.

## 5. Equality statement

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

We give special consideration to children who:

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

## 6. Roles and responsibilities

Safeguarding children is **everyone's** responsibility. Everyone who comes into contact with children and families has a role to play. This policy applies to all staff, volunteers and governance volunteers in the academy and across the trust and is consistent with the procedures of the three safeguarding partners within each local authority region. Our policy and procedures also apply to extended school and off-site activities.

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

- behaviour policy;

- pastoral support system; and
- planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - healthy and respectful relationships
  - boundaries and consent
  - stereotyping, prejudice and equality
  - body confidence and self-esteem
  - how to recognise an abusive relationship (including coercive and controlling behaviour)
  - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
  - what constitutes sexual harassment and sexual violence and why they're always unacceptable

### 6.1 All staff

All staff will:

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

All staff will be aware of:

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

[Section 16](#) and [Appendix D](#) of this policy outline in more detail how staff are trained and supported to do this.



## 6.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Details of our DSL and Deputy DSL are provided at the beginning of this policy - photos and contacts details are clearly displayed in our safeguarding posters in the academy. The DSL takes lead responsibility for child protection and wider safeguarding in the school. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours they can be contacted using the email address indicated on the front of the policy. When the DSL is absent, the deputy DSL will act as cover. If the DSLs are not available, the Trust Safeguarding Lead will act as cover (for example, during out-of-hours/out-of-term activities): contact details are at beginning of this policy.

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

- provide advice and support to other staff on child welfare and child protection matters;
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- contribute to the assessment of children;
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly; and
- have a good understanding of harmful sexual behaviour.

The DSL will also:

- keep the headteacher informed of any issues;
- liaise with local authority case managers and designated officers for child protection concerns as appropriate;
- discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies;
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support;
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search;
- take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place; and
- keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether referrals have been made, and understand the purpose of this record-keeping.

The full responsibilities of the DSL and DDSs are set out in their job description available in [Appendix A](#).

**6.3 The Strategic Leadership Group** of the trust is responsible for leading a proactive safeguarding culture across the trust and its academies, ensuring that policy and practise is consistent and that there is an annual programme of safeguarding review and audit which leads to improvements in our safeguarding support for our school community.

**6.4 The AAB** is collectively responsible for advising on safeguarding and checking that safeguarding arrangements are fully embedded within the academy's ethos and reflected in the academy's day-to-day practice. The **AAB** also appoint a lead member who is responsible for championing good practice within the academy.

**6.5 The OA Board of Trustees** is ultimately responsible for the strategic leadership of the Academy safeguarding arrangements. They will:

- facilitate a whole-school and trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development;
- evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation;
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements;
- appoint a trustee to monitor this policy's effectiveness with the board of trustees.

Make sure:

- the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- the leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- the trust 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 D](#) of this policy covers this procedure; and
- that this policy reflects the pupils with SEND or certain health conditions and understand that they can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group.

Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll) the DSL will:

- seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed;
- make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate; and
- make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

Further information can be found in the guidance [Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings](#)

The lead trustee for safeguarding will act as the 'case manager' if an allegation of abuse is made against a member of the SLG within the trust, where appropriate (see [appendix D](#)).

All trustees and AAB members will read Keeping Children Safe in Education in its entirety.

Section 16 of this policy has information on how governance volunteers are supported to fulfil their role.

**6.6 The academy has a Designated Teacher** who is appropriately trained and is responsible for promoting the educational achievement of children who are looked after. They will work closely with the DSL to address any specific safeguarding concerns and with the Virtual school head to agree how available funding can be best used to support the progress of looked after children and meet the needs identified in the child's personal education plan.

**6.7 The case manager for dealing with allegations** of abuse made against academy staff members is the headteacher. The case manager for dealing with allegations against the headteacher is the executive headteacher (if relevant) or CEO or Director of Academies who will also report to the Trust lead safeguarding trustee. The AAB safeguarding lead will also be informed as appropriate. The procedure for managing allegations is detailed in [Appendix D](#).

**6.8 The Head of Academy** is responsible for the implementation of this policy within their academy, including:

- ensuring that staff (including temporary staff) and volunteers:
  - are informed of our systems which support safeguarding, including this policy, as part of their induction;
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- communicating this policy to parents/carers when their child joins the school and via the school website;
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly;
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see [appendix D](#)); and
- making decisions regarding all low-level concerns, in consultation with the Executive Headteacher, Director of Standards and OA central as appropriate. The process for managing Low-Level Concerns is outlined in the OA Low Level Concerns Toolkit.

**6.9 All staff members, AAB members, volunteers and external providers** should know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child.

#### **6.10 Virtual school heads**

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.

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

## **7. Confidentiality and consent**

We recognise that all matters relating to child protection are confidential. It is also essential that people working with children can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children from harm but also to work together to support families to improve outcomes for all.

The headteacher or the DSL will disclose any information about a pupil to other members of staff on a need-to-know basis, and in the best interests of the child. All staff members must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

All staff members have a professional responsibility to share information with other agencies in order to safeguard children in line with the procedures set out by the three safeguarding partners.

All our staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

The key points of **confidentiality** are summarised below:

- timely information sharing is essential to effective safeguarding;
- fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children;
- the Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe;
- if staff need to share '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;
- 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;

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

There are no easy or definitive answers when a victim makes this request and staff taking a report should never promise confidentiality, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children. The DSL should consider that:

- parents or carers should normally be informed (unless this would put the victim at greater risk);
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care;
- rape, assault by penetration and sexual assault are crimes.

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

Regarding anonymity, all staff will:

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

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information and will support staff who must make decisions about sharing information. If staff are unsure about sharing information, they should speak to the designated safeguarding lead (or deputy). Confidentiality is also addressed in this policy regarding record-keeping in section 15 and allegations of abuse against staff in [appendix D](#).

The **following principles** guide our practice on consent and information sharing:

We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children.

The academy may have to share information about parents or carers, such as their medical history, disability or substance misuse issues, for investigations of child abuse carried out by Children's Social Care.

The Data Protection Act 2018 is not a barrier to sharing information. It is there to ensure that personal information is managed in a sensible way and that a balance is struck between a person's privacy and public protection.

We should be sharing any concerns we have with parents at an early stage, unless this would put a child at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.

Be clear about the purpose of sharing confidential information and only share as much as you need to achieve your purpose.

Try to get consent from parents (or the child, if they have sufficient understanding<sup>1</sup>) to share information, if possible. However, you do not need consent if you have serious concerns about a child's safety and well-being. If you decide to share information without consent, you should record this with a full explanation of your decision.

Consent should not be sought from parents or carers (or the child, if they have sufficient understanding), if:

- it would place a child at increased risk of harm;
- it would place an adult at risk of serious harm;
- it would prejudice a criminal investigation;
- it would lead to unjustified delay in making enquiries about allegations of significant harm to a child; or
- required by law or a court order to share information.

Consent is not necessary in cases where Children's Social Care are making child protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children's Social Care; staff members must make sure to record what information has been shared.

Consent is necessary for:

- Children's Social Care investigations or assessments of concerns under section 17 of the Children Act 1989. Children's Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker in Children's Social Care.
- Early help assessments. Assessments are undertaken with the agreement of the child and their parents or carers.

If you are in any doubt about the need for seeking consent, get advice from the DSL or from Children's Social Care.

Keep a record of your decision to share information, with or without consent, and the reasons for it. Remember also that it is just as important to keep a record of why you decided not to share information as why you did.

## **8. Recognising abuse and taking action**

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

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

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

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

Referral procedures are provided in [Appendix F](#) – flow chart for raising concerns about a child.

If you have any doubt about how to report abuse to the local authority, you can use this link to get contact details: <https://www.gov.uk/report-child-abuse-to-local-council>

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

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions;
- Stay calm and do not show that you are shocked or upset;
- Tell the child they have done the right thing in telling you.
- Do not tell them they should have told you sooner;
- Explain what will happen next and that you will have to pass this information on.
- Do not promise to keep it a secret;
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it; and
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected;
- Not recognise their experiences as harmful; and/or
- 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.

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in [Appendix E](#) of this policy.

**Any teacher** who either:

- is informed by a girl under 18 that an act of FGM has been carried out on her; or
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

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

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

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

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

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

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

[Appendix F](#) illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or the Trust safeguarding lead. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

### **Early help**

Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our academy or other services such as the NHS. Providing help early is more effective in promoting the welfare of children than reacting later. If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our academy will work together with other agencies to provide a coordinated offer of early help, in line with *Working Together to Safeguard Children* and local guidance, to any child who needs it.

We will pool our knowledge within the academy and with other agencies about which families or children need additional support in a range of ways so that we can work out how best to help them. We will use the early help framework within Children's Social Care to identify what level of need the child or their family has.

The Academy will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from early help, for example, if they are:

- bereaved;
- viewing problematic or inappropriate online content or developing inappropriate relationships online;
- have recently returned home to their family from care;
- missing education, or are persistently absent from school, or not in receipt of full-time education;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit; and
- has a parent or carer in custody or is affected by parental offending.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

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

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

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

### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.

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

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

### **8.5 If you have concerns about extremism**

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

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



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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors/trustees can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

### **8.6 If you have a mental health concern**

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. Please also read the trust's mental health statement which outlines the support available for children and staff across the trust.

The Department for Education provides guidance on, [mental health and behaviour in schools](#) and each academy provides training and support to staff in supporting pupils with mental health concerns.

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

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

The headteacher or senior leader as outline above will then follow the procedures set out in [appendix D](#), if appropriate.

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

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

At our academy we believe that all children have a right to attend academy and learn in a safe environment. Children should be free from harm by adults in the academy and other pupils.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others, and their behaviour will be dealt with under the academy's Behaviour Policy.

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

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

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

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

See [Appendix E](#) for more information about child-on-child abuse.

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

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

- you must record the allegation and tell the DSL, but do not investigate it;
- the DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- the DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s); and
- the DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

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

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

To achieve this, we will:

- challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images;
- be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys;
- ensure our curriculum helps to educate pupils about appropriate behaviour and consent;
- ensure pupils can easily and confidently report abuse using our reporting systems;
- ensure staff reassure victims that they are being taken seriously;
- be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners;
- support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed; and

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

## Training

Ensure staff are trained to understand:

- how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports;
- that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”;
- that if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - children can show signs or act in ways they hope adults will notice and react to;
  - a friend may make a report;
  - a member of staff may overhear a conversation; or
  - a child’s behaviour might indicate that something is wrong.
- that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation;
- that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy;
- the important role they must play in preventing child-on-child abuse and responding where they believe a child may be at risk from it;
- that they should speak to the DSL if they have any concerns; and
- that social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

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

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

- Acting would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

## 8.9 Sharing of nudes and semi-nudes (‘sexting’)

### Your responsibilities when responding to an incident

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

You must **not**:

- view, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL);
- delete the imagery or ask the pupil to delete it;
- ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility);

- share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers; or
- say or do anything to blame or shame any young people involved.

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

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

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

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

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

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

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

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

### **Informing parents/carers**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through calling the academy's link police officer and completion of a MASH referral using the Multi Agency Framework (MAF) as appropriated.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and online safety programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

- specific requests or pressure to provide (or forward) such images; and
- the receipt of such images.

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

### **8.10 Reporting systems for our pupils**

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

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

To achieve this, we will:

- put systems in place for pupils to confidently report abuse;
- ensure our reporting systems are well promoted, easily understood and easily accessible for pupils – through posters, discussions with pupils and website information;
- make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback; and
- use our annual audit cycle to check with pupils about their confidence and knowledge about the reporting systems.

## **9. Online safety and the use of mobile technology**

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

To address this, our trust aims to:

- ensure we have in place the appropriate level of security protection procedures to safeguard systems, staff and pupils – we will review these periodically to keep up with evolving cyber-crime technologies – these procedures are outlined in more details in our ICT and online safety policy;
- protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’);
- set clear guidelines for the use of mobile phones for the whole school community; and
- establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

#### The four key categories of risk

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

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

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

- limit pupils' exposure to the above risks from the academy's IT system. Systems are regularly reviewed, and DSLs know how to escalate concerns when identified; and.
- carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our academy's policy on ICT and online safety and the use of mobile phones, please refer to our staff code of conduct and social media policies.

## **10. Notifying parents or carers**

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed; and
- meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

## **11. Pupils with special educational needs, disabilities or health issues**

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers.

Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:

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

To address these additional challenges our academy will ensure that these children receive additional monitoring and pastoral support. This includes individual risk assessment and safety plans being put in place for each pupil, support with acquiring and maintaining EHCPs, 1:1 coaching and mentoring, provision of counselling as needed and multi-agency support as considered appropriate.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

## **12. Pupils with a social worker**

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

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

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

- responding to unauthorised absence or missing education where there are known safeguarding risks; and
- the provision of pastoral and/or academic support.

### **13. Children in Care and Previously in Care**

We will ensure that staff have the skills, knowledge and understanding to keep children in care and previously in care safe. We will ensure that:

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

Our **Designated Teacher** is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

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

### **14. Complaints and concerns about OA safeguarding procedures**

#### **14.1 Complaints against staff**

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

#### **14.2 Other complaints**

We recognise that children cannot be expected to raise concerns in an environment where staff member fail to do so.

We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice.

We will actively seek the views of children, parents and carers and staff members on our child protection arrangements through surveys, questionnaires and other means.



Further information and support for staff is available in [Appendix D](#) on managing allegations, our code of conduct, and our whistleblowing policy.

### 14.3 Whistleblowing

Our whistleblowing policy provides details of how concerns can be raised about the trust's safeguarding practice – it is available on our academy and trust websites.

## 15. Record keeping

Accurate and timely record keeping is an important part of the academy's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children. We will hold records in line with our records retention schedule.

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

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:

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

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

All academies use CPOMs for the secure storage and sharing of information related to safeguarding. If staff do not feel confident in the use of CPOMS they should ask for further training from the DSL.

All staff members, trustees and AAB members, volunteers, contractors and activity providers should ensure that they record and report safeguarding concerns in line with guidance from the local multiagency procedures.

The DSL will ensure that records (be they on CPOMS or in paper format) are maintained appropriately and securely for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of the above guidance.

In addition:

- [Appendix C](#) and our safer recruitment procedures set out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks; and
- [Appendix D](#) sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## 16. Training

### 16.1 All staff

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

This training will be regularly updated and will:

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

All new members of staff, including early career teachers and teaching assistants, will be given an induction which includes the following:

- issue and explain the safeguarding and child protection policy;
- issue and explain the behaviour policy;
- issue and explain the staff code of conduct;
- issue and explain the policy/guidance which includes the safeguarding response to children who go missing from education;
- explain the role of the DSL and share the identities of the DSL and all DDSs;
- issue Part One and Annex B of Keeping Children Safe in Education;
- child protection and safeguarding training (including online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.); and
- all new members of staff are expected to read the above-mentioned documents and to sign an acknowledgement of this.

The induction and CPD programme for staff will include the following key aspects:

- staff understand the difference between a safeguarding concern and a child in immediate danger or at risk of significant harm;
- staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned;
- when concerned about the welfare of a child, staff should always act in the best interests of the child;
- staff understand that children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse;

- staff understand that children who have a social worker may be educationally disadvantaged and face barriers to attendance, learning, behaviour and positive mental health;
- staff understand that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- staff understand that mental health issues for children may be an indicator of harm or abuse, or where it is known that a child has suffered harm or abuse this may impact on their mental health, behaviour and education;
- staff understand that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence;
- staff know how best to respond to a child who makes a disclosure of abuse or harm;
- if staff are unsure, they should always speak to the DSL or deputy DSL;
- if staff have any concerns about a child's welfare, they should act on them immediately.
- Staff should not assume a colleague, or another professional will act;
- the DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from the LADO. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible; and
- staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Staff members who miss whole-academy training will be required to undertake other relevant training to make up for it, e.g. by joining another academy's whole-academy training or having a 1:1 session. The DSL will be responsible for arranging this.

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

Volunteers will receive appropriate training, if applicable.

The academy will maintain accurate records of staff induction and training.

### **16.2 The DSL and Deputy DSLs**

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

They will also undertake Prevent awareness training.

### **16.3 Trustees and AAB members**

All trustees and AAB members receive training about safeguarding and child protection (including online safety and cyber security) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge; and
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

The safeguarding trustee lead may be required to act as the 'case manager' if an allegation of abuse is made against a member of SLG, they will receive training in managing allegations for this purpose.

#### **16.4 Recruitment – interview panels**

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

See [appendix C](#) of this policy and our safer recruitment statement for more information about our safer recruitment procedures.

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

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

### **17. Quality Assurance and monitoring of effectiveness**

We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of child protection files and records by the DSL

We will complete an annual programme of audits and reviews led by the trust. This includes: an internal audit visit from the trust lead for safeguarding, a review from the lead trustee for safeguarding and the link AAB member, and an externally commissioned audit. We will also participate in any reviews requested by the Local Safeguarding Children Partnership or Local Authority. We will also carry out regular internal audits.

The academy's senior management and the trust board will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in child protection arrangements.

This policy will be reviewed **annually** by the trust safeguarding lead. At every review, it will be approved by the Board of Trustees.

### **18. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour
- Anti-bullying
- Staff code of conduct (with staff handbook)
- SEND
- Complaints
- Suspension and permanent exclusion policy
- Children missing education
- Positive handling and de-escalation
- Administration of medicines

Health and safety  
Attendance  
ICT and Online safety  
Social media  
Equality  
Relationships and sex education & PSHE  
Mental health  
First aid  
Curriculum  
Privacy notices  
Whistleblowing

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

## **APPENDIX A - The role of the Designated Safeguarding Lead (and deputy)**

### **1 MANAGING REFERRALS**

- Refer all cases of suspected abuse to local authority Children's Social Care and to the Police if a crime may have been committed.
- Liaise with the headteacher about safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding.
- Liaise with agencies providing early help services and coordinate referrals from the academy to targeted early help services for children in need of support. Monitor any cases referred to early help and consider referral to children's services where the situation does not improve.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.

### **2. WORKING WITH OTHERS**

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the three safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety): when deciding whether to make a referral by liaising with relevant agencies and so that children's needs are considered holistically;
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;

- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; and
- promote educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on children's attendance, engagement and achievement at school.

Working with the headteacher and other staff, the designated safeguarding lead should take lead responsibility for:

- ensuring that the school or college knows who its cohort of children who currently need a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
- support teaching staff to feel confident to provide additional academic support or reasonable adjustments to help children who need or have needed a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

### **3. INFORMATION SHARING AND MANAGING THE CHILD PROTECTION FILE**

- The DSL is responsible for ensuring that child protection files are kept up to date and stored securely. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE.
- Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.
- Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving in order to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **4. AWARENESS RAISING**

- Review the safeguarding and child protection policy and procedures annually in partnership with OA central who will recommend the policy to OA trustees for approval.
- Make the safeguarding and child protection policy and procedures available publicly and raise awareness of parents that referrals about suspected abuse may be made and the role of the academy in any investigations that ensue.
- Provide updates to the academy on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews, at least annually.

- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. This could include ensuring that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

## **5 TRAINING, KNOWLEDGE AND SKILLS**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- can keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation;
- can understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

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

## APPENDIX B - Types of Abuse

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

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

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

### Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

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

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



## **APPENDIX C - Safer recruitment and DBS checks**

### **Recruitment and selection process**

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education. Our recruitment, retention and DBS policy provide more detail about actions we take to ensure we recruit suitable people.

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

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

### **Advertising**

When advertising roles, we will make clear:

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

### **Application forms**

Our application forms will:

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

### **Shortlisting**

Our shortlisting process will aim to include three people and will:

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

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so they can share relevant information and discuss it at the interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true and that they will inform us should there be any subsequent change to the information.

We may also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. This will be completed by someone with no other involvement in the recruitment process. If this is to occur, OA will inform shortlisted candidates that online searches may be done as part of due diligence checks.

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

We will make every effort to obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

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

### **Interview and selection**

When interviewing candidates, we will:

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

### **Pre-appointment vetting checks**

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

### **New staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, the appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could, where available, include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter confirming they have not imposed any sanctions or restrictions, and/or are aware of any reason why that person may be unsuitable to teach
  - Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* *Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.*

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

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

### **Existing staff**

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

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

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

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

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

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

### **Contractors**

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

This will be:

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

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

### **Trainee/pupil teachers**

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

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

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **Trustees, AAB members and Members**

All members, trustees and AAB members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, members, trustees, and AAB members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)) - excluding AAB members
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

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

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

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

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

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

### **Single Central Record**

The headteacher and trust lead for safeguarding are responsible for ensuring that our **single central record** is accurate and up to date. This will be checked at regular intervals throughout the year in line with our quality assurance process.

## **APPENDIX D - Managing allegations of abuse made against all staff including supply staff, volunteers and contractors**

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our academy. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. Our general principles are outlined below and are based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education':

***OA has in place a central HR manager who will provide support and advice to academy staff should there be an allegation against an adult.***

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

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

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

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

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

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

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

### **Suspension of the accused until the case is resolved**

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

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

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

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

### **Definitions for outcomes of allegation investigations**

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

### **Procedure for dealing with allegations**

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. It is important to ensure that local documentation is completed to the LADO this could include a LADO referral form and MAF. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is

evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

**If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the academy and their contact details

**If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

**If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate:

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

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

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

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

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

### **Timescales**

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

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

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

### **Specific actions**

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

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

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

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

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

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

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



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

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

If a report is:

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

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

If an allegation is:

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

### **Confidentiality and information sharing**

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

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

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

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

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

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

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

### **References**

When providing employer references, we will:

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

### **Managing the situation and exit arrangements**

The academy has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our academy, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or OA HR. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety and welfare of children, including any in which the person refuses to cooperate with the process.

‘Settlement agreements’ (sometimes known as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person’s notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

### **Learning lessons**

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

This will include consideration of (as applicable):

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

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

### **Non-recent allegations**

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

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

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

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

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above. It also applies to organisations or individuals using academy premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we would follow safeguarding procedures, including informing the LADO.

Concerns may arise through, for example:

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

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

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

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis where they cannot easily be seen
- Humiliating pupils

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

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any patterns, clusters or concerns in the academy's safeguarding system

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

If the concern is raised via a third party, the headteacher will appoint an incident assessor who will collect evidence where necessary by speaking:

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

The incident assessor will follow the guidance set out in the trust's 'Incident Toolkit' and collate the relevant information using the templates within that tool kit. They will give this to the headteacher who will use the information collected to categorise the type of behaviour and determine any further action, in line with the trust's staff code of conduct and where, relevant in consultation with their line manager.

Further information about responding to low-level concerns is provided in this DfE recommended report: [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

### Record keeping

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

Records will be:

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

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

### References

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

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

The flow chart below summarises the procedures to be followed when dealing with an allegation made against an individual who works with children.

## APPENDIX E - Specific safeguarding issues

This appendix is based on the advice in Keeping Children Safe in Education, in particular annex B – which also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime. **All staff should read Annex B in addition to this appendix.**

### 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, exploitation 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 and online. It can also take place both face-to-face and online and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that does not 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 nudes and semi nudes, images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who do not 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 and child/adolescent to parent violence and abuse. 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.

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 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.

In line with Operation Encompass, 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 the academy (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 and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

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

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

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

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

## **FGM**

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

Section 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 a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

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

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the 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 [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **Preventing radicalisation**

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

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

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

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

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 and 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.

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

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

We check the identity of all visitors and volunteers coming into academy. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the academy site. OA has a system of blue and red lanyards to differentiate between those who can be on site unattended and those who need to be supervised by another adult at all times. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out – if this has been provided, we will not ask to see the DBS certificate.

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

The academy will not accept the behaviour of any individual, parent or anyone else, that threatens academy security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the academy site.

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact the parent/carer immediately and inform the police in line with procedures outlined in our attendance policy. The Trust's Attendance and Welfare lead will be available to provide advice and guidance to school leaders.

## **APPENDIX F – Flowchart for raising safeguarding concerns about a child**

## Flow chart for raising safeguarding concerns about a child

### Safeguarding Trustee:

**Rosemary Leeke**  
 rosemary.leeke@oliveacademies.org.uk

### Designated Safeguarding Lead:

**Tony Machin**  
 tony.machin@oliveacademies.org.uk

### Deputy Designated Safeguarding Leads:

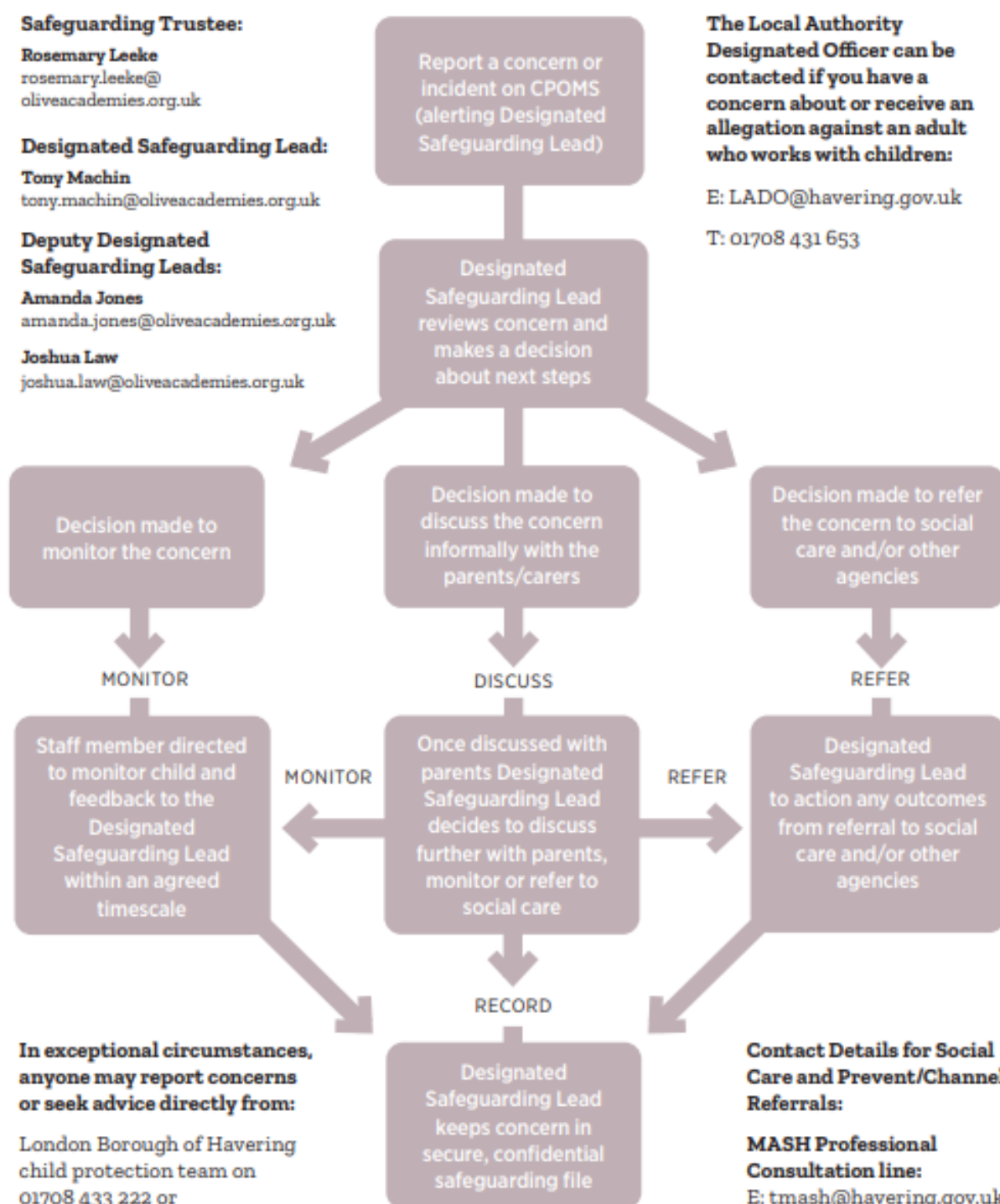
**Amanda Jones**  
 amanda.jones@oliveacademies.org.uk

**Joshua Law**  
 joshua.law@oliveacademies.org.uk

**The Local Authority Designated Officer can be contacted if you have a concern about or receive an allegation against an adult who works with children:**

E: LADO@havering.gov.uk

T: 01708 431 653



**In exceptional circumstances, anyone may report concerns or seek advice directly from:**

London Borough of Havering child protection team on 01708 433 222 or [www.havering.gov.uk/info/20083/safeguarding\\_children](http://www.havering.gov.uk/info/20083/safeguarding_children)

**Contact Details for Social Care and Prevent/Channel Referrals:**

**MASH Professional Consultation line:**  
 E: [tmash@havering.gov.uk](mailto:tmash@havering.gov.uk)  
 T: 01708 433 222

Out of hours service:  
 T: 01708 433 999

**NSPCC Whistleblowing Helpline 0800 028 0285**

## APPENDIX G – Further Information

1. Havering Local Safeguarding Children Partnership: [About Us - Havering Safeguarding Children Partnership \(safeguardinghavering.org.uk\)](https://safeguardinghavering.org.uk)
2. Havering SET Procedures <https://haveringchild.proceduresonline.com/index.htm>
3. Havering Child Missing Education Policy 2024-2025 [Children Missing Education Policy 2024-2025 \(havering.gov.uk\)](https://havering.gov.uk)
4. Havering Child Missing Education guidance: [Missing Children - Havering Safeguarding Children Partnership \(safeguardinghavering.org.uk\)](https://safeguardinghavering.org.uk)
5. Havering Child Sexual Exploitation Guidance: [What is child sexual abuse and exploitation \(CSE\)? | Child sexual abuse and exploitation | London Borough of Havering](https://www.havering.gov.uk/what-is-child-sexual-abuse-and-exploitation-cse/)
6. Sharing nudes and semi-nudes guidance: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
7. DfE Guidance: Safeguarding practitioners: information sharing advice: <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
8. DfE Statutory guidance: Working together to safeguard children: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
9. DfE Statutory guidance: Keeping children safe in education [www.gov.uk/government/publications/keeping-children-safe-in-education--2](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)
10. DfE guidance: Sexual violence and sexual harassment between children in schools and colleges: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999239/SVSH\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf)
11. DfE: Advice what to do if you are worried that a child is being abused 2015: <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
12. Guidance on e-security – [National Education Network](https://www.nen.org.uk)
13. [Cyber security standards for schools and colleges](https://www.nen.org.uk)
14. LGfL online safety policies: [lgfl.net](https://www.lgfl.net)
15. The Prevent duty – guidance for schools and childcare providers: <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>