Lightwoods Primary Academy

Safeguarding and Child Protection Policy

Committee and Date Approved	Trust Board - September 2021
Category	Statutory
Next Review Date	Annually unless change in legislation – September 2022
Policy Availability	Trust & Academy Website
Officer Responsible	Principal

Contents

Introduction 5
Terminology 6
Purpose of Safeguarding Policy 6
West Midlands Child Protection Safeguarding Procedures 8
Background 8
How to use the manual 9
Child protection referrals 10
Legislation and Statutory Guidance 10
Working Together to Safeguard Children (2018) 10
The Children Acts of 1989 and 2004 11
The Children Act 2004 11
Keeping Children Safe in Education (2021) 12
What to do if you're worried a child is being abused 2015 12
The Designated Safeguarding Lead 13
Key personnel 14
It is the role of the Designated Safeguarding Lead for Child Protection 14
The Governing Body 16
The Principal 17
Academy Procedures – Staff Responsibilities 17
Good practice guidelines and staff code of conduct 18
Abuse of position of Trust 19
Children who may be particularly vulnerable 19
Impact of homelessness upon children 21
Missing children 21
CME – Children Missing Education 21
Helping children to keep themselves safe 23
Support for those involved in a child protection issue 23
Complaints procedure 23
Whistle blowing if you have concerns about a colleague 24
Allegations against staff 24
Staff training 27
Safer recruitment 28

Regulated Activity 30
Volunteers 30
Supervised volunteers 30
Contractors 30
Site security 30
Allegations of abuse made against other pupils 31
Extended school and off-site arrangements 37
Photography and images 37
Online Safety 37
Organisations for support 39
Staff / Pupil relationships 40
Visiting Speakers' Policy 40
Key aspects of the visiting speakers' policy 41
Dealing with a Disclosure 41
Receive 42
React 42
Reassure 42
Record 42
Refer 43
Making a Referral 43
How to make a referral to Children's Social Care if a child is at risk of significant harm 44
Concerns re: Terrorism / Radicalisation 44
Gypsy, Roma and Traveller Children 45
Children in Whom Illness is Fabricated or Induced (formerly known as Munchausen's Syndrome by Proxy) 45
Spiritual Abuse 45
Pupils with special educational needs, disabilities or health issues 48
Pupils with a social worker 48
Looked-after and previously looked-after children 48
Confidentiality 49
Communication with Parents 49
Record Keeping 50
Electronic Record Keeping Software System: 51
Chronology 51
Reporting 51

Anywhere 51
Alerts 51
Reviews 51
Body Maps 51
Dashboards 52
Tags 52
Physical Interventions 52
Statutory School policies 53
Other Recommended Policies; 53
Useful Telephone Numbers 54
APPENDIX A: DEFINITIONS OF ABUSE AND NEGLECT 54
Physical Abuse 54
Emotional Abuse 55
Sexual Abuse 57
Child Sexual Exploitation 58
Child Criminal Exploitation 59
Neglect 60
Private Fostering 61
Forced Marriage (FM) 62
Female Genital Mutilation (FGM) 63
APPENDIX B 69
Aide-memoire for Professionals to support efficient and appropriate telephone referrals of children who may be suffering, or are likely to suffer, significant harm 69
APPENDIX C - Child protection and the use of shared sports facilities: 70
APPENDIX D The role of the Head Teacher 71
The role of the Designated Safeguarding Lead for Child Protection 71
Referrals: 72
Training 72
Raising Awareness 72
The role of The Governing Body is to: 73
APPENDIX E 75
APPENDIX F: Process Map 76
APPENDIX G Safeguarding Guidance 77
PREVENT 77
Support with Referrals 80

Referral System 81
Appendix H: Peer on Peer Abuse 81
https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges 82
What is Sexual violence and sexual harassment? 83
What is consent? 84
Definition 84
Upskirting 85
Downblousing 85
Guidance 85
Risks 86
Protection and Action to be taken 86
The Victim 87
The Alleged Perpetrator 87
Other children 89
Issues 89
Child protection during the COVID-19 measures ..... **Error! Bookmark not defined.**
Context ..... **Error! Bookmark not defined.**
Version control and dissemination ..... **Error! Bookmark not defined.**
Safeguarding priority ..... **Error! Bookmark not defined.**
Current school position ..... **Error! Bookmark not defined.**
Safeguarding partners' advice ..... **Error! Bookmark not defined.**
Roles and responsibilities ..... **Error! Bookmark not defined.**
Vulnerable children ..... **Error! Bookmark not defined.**
Increased vulnerability or risk ..... **Error! Bookmark not defined.**
Attendance ..... **Error! Bookmark not defined.**
Reporting concerns about children or staff ..... **Error! Bookmark not defined.**
Staff training and induction ..... **Error! Bookmark not defined.**
Safer recruitment/volunteers and movement of staff ..... **Error! Bookmark not defined.**
Peer on peer abuse ..... **Error! Bookmark not defined.**
Online safety ..... **Error! Bookmark not defined.**
New children at the school ..... **Error! Bookmark not defined.**
Supporting children not in school ..... **Error! Bookmark not defined.**
Safeguarding and Promoting Children's Welfare Procedural Flowchart ... **Error! Bookmark not defined.**

Introduction

This document is the Safeguarding and Child Protection Policy for Lightwoods Primary Academy and any extended services that it provides.

This policy applies to all staff (teaching and non-teaching), governors and volunteers, temporary and supply/visiting staff working in the academy. It will be reviewed annually by the Governing Body and is in line with the expectations of Ofsted/ISI which inspects safeguarding arrangements as part of the academy's Leadership and Management and the requirements of the (Local) Safeguarding Partnership.

Academies within Sandwell, Dudley, and Birmingham, often have young people attending who live in any one of the Local Authorities. It is therefore important that all staff are aware of the reporting procedures for all Local Authorities. The academy will continue to liaise with the Local Authority Children's Services that they are situated in, and the DSL will keep up to date with information from the neighbouring Local Authorities.

The principles embedded in this policy link into other policies and guidance relating to: Health and Safety, PSHE, Sex and Relationship Education, Anti-bullying, Equal Opportunities, Special Educational Needs, Confidentiality, Attendance, Substance Misuse (including drugs and alcohol), Racism and Homophobia, Educational visits, E- safety, Anti-extremism, Academy Security etc.

Safeguarding and promoting the welfare of children is defined by the Department for Education as:

- protecting children from maltreatment.
- preventing impairment of children's health or development.
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.
- Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

This Safeguarding and Child Protection Policy forms one part of the academy's safeguarding responsibilities and should be read in conjunction with the Safer Recruitment Policy, Behaviour Policy, Attendance Policy, Physical Intervention Policy, Anti-Bullying Policy, Mobile Phone Usage Policy, and any other relevant policies as defined in the Annual Report to The Governing Body.

The academy has a culture of vigilance and are committed to safeguarding children and young people, and we expect everyone who works in our academy to share this commitment.

All adults in our academy take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child. Pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

The academy is aware of and assesses the risks and issues in the wider community when considering the well-being and safety of its pupils.

Terminology

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of 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 refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the academy, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, and adoptive parents.

Purpose of Safeguarding Policy

3.Purpose of a Safeguarding and Child Protection Policy	To inform all members of staff, parents, volunteers, and governors about the academy's responsibilities for safeguarding children and their responsibilities therein
Sandwell Children's Safeguarding Partnership (SCSP)	We follow the procedures agreed by Sandwell Children's Safeguarding Partnership (SCSP)
Academy Staff & Volunteers	Staff are well placed to observe the outward signs of abuse. The academy will therefore: Ensure that all staff and volunteers receive safeguarding children training, to help identify concerns. Ensure that all staff are aware of this policy and those relating to the safeguarding of children.
Principles	This academy recognises its responsibility to protect and safeguard the welfare of the children and young people entrusted to its care by establishing a safe and trusting environment in which children can learn and develop. The policy applies to all children between the ages of 0-18

	whose care and education comes within the remit of Shireland Collegiate Academy Trust . The staff and Governing Body of this academy are committed to establishing and maintaining an environment where children feel secure, are encouraged to talk, and are listened to. We will ensure that children know there are trusted adults in the academy who they can approach if they are worried and that the principles of confidentiality are made clear to children and young people. Children need to be supported in approaching any member of staff they feel most comfortable in speaking with. The academy promotes a positive, supportive, and secure ethos, giving pupils a sense of being valued. To ensure children know that there are adults in the academy whom they can approach if they are worried. This academy also recognises its duty to work with other agencies in protecting children from harm and in responding to concerns about possible abuse, including the Police, Child and Adolescent Mental Health Services, Attendance & Prosecution Service, Inclusion Support Service and other agencies/services coming into the academy to support individual pupils/groups of pupils. To ensure that children who are subject to multi-agency plans are supported by the academy as defined in that plan. To develop and deliver the PSHE curriculum to create opportunities for children to develop the skills they need to recognise and stay safe from harm including education and training in relation to Sexual Violence and Harassment, Domestic Abuse (DA), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM) Honour based abuse (HBA) as redefined in the former KCSiE 2020, Forced Marriage (FM) and Radicalisation. To include training. To encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the academy and where political issues are brought to the attention of the pupils, reasonably practicable steps have been taken to offer a balanced presentation of opposing views to pupils. To contribute to children being healthy, safe, enjoying and achieving, making a positive contribution, and achieving economic well-being.

	The academy will ensure that parents and carers have an understanding of the responsibility placed on staff for child protection by setting out its obligations in the academy prospectus and or website. The Safeguarding and Child Protection policy is made available to parents on request and published on the academy website.
Implementation, Monitoring and Review of the Safeguarding and child protection Policy	The DSL will ensure that the Safeguarding and Child Protection policy is put on the agenda of the Standards and Performance committee/Governing Body at least once a year for discussion, monitoring, review, and renewal. In this way the Governing Body authorises the DSL for Child Protection to carry out his/her responsibilities as outlined in the statutory guidance

West Midlands Child Protection Safeguarding Procedures

These child protection and safeguarding procedures are for nine Safeguarding Partnerships in the West Midlands and have been effective from 31st March 2017.
http://westmidlands.procedures.org.uk/

Background

A project proposal was successfully submitted to DfE on behalf of the West Midlands Safeguarding Partnerships to develop regional safeguarding procedures. It was felt that it would be sensible to move to a more regional approach to multi-agency working around safeguarding, especially in light of the fact that so many partner organisations (including Police, Probation, Health, and many others) span an area that crosses local authority boundaries.

How to use the manual

Use the link to the contents page to access the different sections of the regional procedures – Statutory Child Protection Procedures; Regional Safeguarding Guidance; Local Area Specific Safeguarding Information and Procedures
With respect to the Local Area Specific Safeguarding Information and Procedures please choose from the drop-down list to access the localised content for your respective area.

Child protection referrals

Sandwell Children's Safeguarding Partnership, use this link https://www.sandwellcsp.org.uk/

Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

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

Working Together to Safeguard Children (2018) requires all schools / academies to follow the procedures for protecting children from abuse which are defined by the Local Children's Safeguarding Partnership and have appropriate procedures in place for responding to

all concerns of actual or suspected abuse including allegations against members of staff in a position of trust.

The best way to safeguard a child is through effective early help and prevention so it is important to carry out effective early help assessment and take on the role of the Lead Professional.

Multi-agency Threshold Documents explain early help and expectations more in depth.
"Working Together to Safeguard Children" (2018)

https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Nothing is more important than children's welfare. Children who need help and protection deserve high quality and effective support as soon as a need is identified.

We want a system that responds to the needs and interests of children and families and not the other way around. In such a system, practitioners will be clear about what is required of them individually, and how they need to work together in partnership with others.

Whilst it is parents and carers who have primary care for their children, local authorities, working with partner organisations and agencies, have specific duties to safeguard and promote the welfare of all children in their area.

The Children Acts of 1989 and 2004

…set out specific duties: section 17 of the Children Act 1989 puts a duty on the local authority to provide services to children in need in their area, regardless of where they are found; section 47 of the same Act requires local authorities to undertake enquiries if they believe a child has suffered or is likely to suffer significant harm. The Director of Children's Services and Lead Member for Children's Services in local authorities are the key points of professional and political accountability, with responsibility for the effective delivery of these functions.

These duties placed on the local authority can only be discharged with the full cooperation of other partners, many of whom have individual duties when carrying out their functions under section 11 of the Children Act 2004 (see chapter 2). Under section 10 of the same Act, the local authority is under a duty to make arrangements to promote cooperation between itself and organisations and agencies to improve the wellbeing of local children (see chapter 1). This co-operation should exist and be effective at all levels of an organisation, from strategic level through to operational delivery.

The Children Act 2004, as amended by the Children and Social Work Act 2017, strengthens this already important relationship by placing new duties on key agencies in a local area. Specifically, the police, clinical commissioning groups and the local authority are under a duty to make arrangements to work together, and with other partners locally, to safeguard and promote the welfare of all children in their area.

Everyone who comes into contact with children and families has a role to play.
Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

Keeping Children Safe in Education (2021)

places the following statutory duties on all schools:

- School should be aware of and follow the procedures issued by Children's Safeguarding Partnerships.
- Staff should be vigilant to signs of abuse and to whom they should report any concerns on to.
- School should have procedures in place which are disseminated to all staff for handling suspected or actual cases of abuse of pupils, including procedures to be followed in the case of allegations against persons in a position of trust.
- Every school should have Designated Safeguarding Lead who is a member of the senior management team and responsible for co-coordinating safeguarding/child protection work within the school and liaising with other agencies as appropriate.
- Staff with designated responsibility for safeguarding and child protection should receive appropriate single agency and multi-agency training approved by Sandwell Children's Safeguarding Partnership at least every two years.
- All other staff in school should receive training to raise their awareness of signs and symptoms of suspected or actual abuse and the procedures they should follow annually.
- That all schools, academies, and FE colleges should share information and work in partnership with other agencies when there are concerns about a child's welfare.
- The former version of KCSiE, 2020, confirms the definition of safeguarding children includes both mental and physical health and we now must all ensure we pay particular attention to the mental health of young people.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

What to do if you're worried a child is being abused 2015

Advice for practitioners is non-statutory advice which helps practitioners (everyone who works with children) to identify abuse and neglect and take appropriate action.

In the UK, more than 50,000 children are annually subject to a child protection plan. Research suggests that one child a week dies from abuse and one child in six is exposed to violence in the home. The prevalence of neglect continues to be a major concern and online abuse is increasing. The sexual exploitation of children is a growing problem and disabled children are three times more likely to be abused and neglected.

Due to their day-to-day contact with pupils, school staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that all school staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The school will always act on identified concerns

The UK faces a severe and continuing threat from international terrorism. The Government is taking tough security measures to keep people safe but action at a local level is also essential to stop people becoming or supporting terrorists or violent extremists. Local authorities and the Police need to take a lead in ensuring that local partnerships have been clearly tasked with driving delivery of a jointly agreed programme of action. From 1 July 2015 all schools must have regard to the statutory guidance around the Prevent Duty (this also applies to registered early years childcare providers and registered later year's childcare providers). They are subject to a duty under section 26 of the Counterterrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies.

The Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) for child protection will co-ordinate action on child protection within the academy. The DSL is to have the overall contextual safeguarding view for all students within the academy. This means to consider and have an understanding of wider community issues when we consider the wellbeing and safety of young people. This includes ensuring that all staff, teaching, and non-teaching (including supply staff) know who the Designated Safeguarding Lead is and that they are aware of their individual responsibility to be alert to the signs of abuse and to discuss any concerns with the Designated Safeguarding Lead.

Also, that they are aware of what happens once a concern has been raised.

The DSL for Safeguarding and Child Protection is a member of the Senior Leadership Team.

A Deputy DSL should be appointed to act in the absence/unavailability of the DSL.
In the absence of the DSL and the Deputy DSL the most senior member of staff in the academy will assume responsibility for any child protection matters that arise. However, if there is no person qualified to DSL level, staff members must understand their duty to report any Child Protection concerns directly to the Local Authority.

Key personnel

The Designated Safeguarding Lead (DSL) for child protection is: Rob Matthews
Contact details: via the school
email: rob.matthews@lightwoods.sandwell.sch.uk
Tel: 0121 – 429 2542

The deputy designated person(s) is Wendy Jackson (DHT)
email: wendy.jackson@lightwoods.sandwell.sch.uk
Tel: 0121 – 429 2542

The Principal is Rob Matthews
Contact details: above.

Our Chair of SPC is Mr A. Savell-Boss, contactable via the main school office, or trust email address.
admin@lightwoods.sandwell.sch.uk
or
info@shirelandcat.org.uk

It is the role of the Designated Safeguarding Lead for Child Protection:

- Ensure that they receive refresher training at least every two years.
- To keep their knowledge and skills up to date.
- Ensure that all staff who work with children undertake appropriate training to equip them to carry out their responsibilities for safeguarding children annually which will enable them to recognise when they are at risk and how to get help when they need it, as well as recognising the signs and symptoms of abuse including Sexual Violence and Sexual Harassment, Online Safety, Domestic Abuse (DA), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM), Honour Based Abuse (HBA) and Forced Marriage (FM).
- Ensure there is effective induction in safeguarding and child protection for all adults working in the academy, be they staff or volunteers, including supply agency staff which are to be undertaken no longer than 10 working days of commencement of their contract.
- Be aware of young people who have a social worker
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and academy and college leadership staff.
- Make sure that concerns are raised by staff/volunteers when necessary
- Offer support and guidance to all adults working within the academy on matters of safeguarding and child protection.
- Ensure that the names and contact details of the DSL/Deputy are on display for all staff, parents, pupils, and visitors to the academy.

- Ensure that (whenever possible) the Designated and Deputy Designated Safeguarding Leads are not out of the academy (e.g., at training events) at the same time. If they are absent, arrangements should be in place to ensure their duties are covered during their absence.
- Ensure that the telephone number for the MASH team is available and easily accessible to staff in case, for any reason, the DSL and Deputy are not contactable, in order to ensure there is no unwarranted delay in referral.
- Discuss concerns as required with outside agencies e.g., specific agency for single need (e.g., speech and language, Inclusion Support), early intervention multi-agency (e.g., Early Help process) or Multi Agency Safeguarding Hub (MASH) /existing social worker (child protection/significant harm concerns). We recognise how children who have a social worker are potentially more vulnerable to further harm, as well as also having barriers to education, attainment, attendance, and mental health issues.
- Complete all necessary paperwork and correspondence including referral forms to the Early Help team or MASH in regard to safeguarding and child protection referrals.
- Ensure that the academy is represented by a Designated Safeguarding Lead at Child Protection conferences, core groups and multi-agency meetings about 'Children in Need'. It is the DSL who should attend Child Protection Conferences rather than another representative. If this is not possible, the Deputy Designated Person should attend. If neither can attend apologies must be given and a written report must be submitted prior to the conference.
- Compile and submit a written report regarding children who are subject to Child Protection conferences. This should be shared with parents before the conference takes place.
- Ensure there is appropriate representation on Core Groups when a child is on a child protection plan. If the most appropriate person is a class teacher, there must be joint working with the Designated Safeguarding Lead.
- Consider appropriate safeguarding supervision arrangements.
- Ensure there is appropriately trained staff to lead on and that all staff are aware of the Early Help process.
- Ensure that relevant staff are informed and advised about appropriate action when a child is subject to a Child Protection Plan
- Ensure that welfare records are kept securely and confidentially (locked and with limited access). Consideration should be given to using an electronic software for recording
- Ensure that safeguarding and child protection records are chronologically recorded, with significant incidents or events clearly highlighted. These records should be reviewed regularly and focus on outcomes for the child/children.
- Ensure that records are transferred when a child changes academy.
- Ensure mechanisms are in place to support the DSL in specific regard to their welfare responsibilities e.g., weekly/monthly one to one meeting between the Designated and Deputy Designated Persons to offer mutual support.
- Keep the academy's SMT/SLT, Governors, Local Authority and Local Children's Safeguarding Partnership informed about safeguarding and child protection issues as requested.
- Provide guidance to parents, children, and staff about obtaining suitable support.

- Discuss with new parents the role of the DSL and the role of safeguarding in the academy. Make parents aware of the safeguarding procedures used and how to access the Safeguarding and Child Protection Policy.
- Ensure staff understand their responsibility to report concerns to a member of SLT or seek advice from the local children's social care, as detailed in KCSIE 2018 and then KCSIE 2020 and then 2021.

The Governing Body

The Governing Body has overall responsibility for ensuring that there are sufficient measures in place to safeguard the children in their establishment. It is recommended that a nominated governor for child protection is appointed to take lead responsibility.

The governing body will:

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

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the principal, where appropriate (see appendix).

All governors will read Keeping Children Safe in Education in its entirety.

It is the responsibility of the governing body to decide which staff read the full Part One of KCSIE or the condensed version.

The nominated governor for child protection is to be confirmed.

In particular The Governing Body must ensure that:

- Safeguarding and Child Protection Policy and procedures are in place and reviewed annually
- Safer recruitment procedures are in place and reviewed annually
- Position of trust procedures are in place and reviewed annually.
- A DSL who is a senior member of academy leadership team is appointed and notify the LA of any changes in personnel to this role.
- There is a dedicated teacher for Looked after Children who have been appropriately trained. This staff member has a key role in promoting the educational achievement of Looked after Children and engaging with the DSL.

- A member of The Governing Body (usually the Chair) is nominated to be responsible in the event of an allegation of abuse being made against the Principal.
- Relevant safeguarding / child protection training is accessed by all academy staff / volunteers according to their role and responsibilities.
- That they receive an annual report from the DSL regarding safeguarding/child protection work including details of Early Help involvement and the lead professional role which has been undertaken in the year which is shared with the LA or other appropriate body.
- Deficiencies or weaknesses in safeguarding arrangements are remedied without delay, liaising with relevant bodies for support as required.
- The Governors support the DSL in carrying out their responsibilities as outlined in 'Keeping Children Safe in Education', (2021) and role in Job Description.

The Principal

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

- Ensuring that all staff (including temporary staff) and volunteer:
    - Are informed of systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedure 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 academy and via the academy website
- Ensuring 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
- Ensuring the relevant staffing ratios are met, where applicable

Academy Procedures – Staff Responsibilities

All academy staff and volunteers need to be alert to the potential abuse of children both within their families and from other sources, including members of the academy community.

If any member of staff is concerned about a child, the DSL (or the rep in their absence) must be informed immediately. There is an absolute responsibility for all members of the academy to respond to any suspected or actual abuse of a child in accordance with these procedures.

The member of staff must record information regarding the concerns and ensure the written record is passed to the DSL on the same day. The recording must be a clear, precise, factual account of the observations.

There may be emerging needs or adversities faced by children and their families that could be addressed through Early Help. The LA threshold documents will guide you on what is the most appropriate level of support for families based on their level of need.

The academy will robustly monitor the attendance of children on roll in the academy in line with the Attendance Policy. When a safeguarding / child protection concern is raised, attendance concerns will be shared with partner agencies in accordance with local information sharing protocols.

The DSL will decide whether the concerns should be referred to Children's Social Care via the MASH. If it is decided to make a referral to Children's Social Care this will be discussed with the parents and consent sought, unless to do so would place the child at further risk of harm, place a vulnerable adult at risk or compromise any enquiries that may need to be made.

When concerns have been raised regarding a child or they are subject to any multi-agency work a written record will be kept securely and separately from the child's main pupil record.

Whenever a child transfers to another academy all academy records, including safeguarding / child protection files will be sent to the receiving academy in a secure manner and relevant agencies will be informed of the new academy that the child has moved to.

The DSL is responsible for making the Senior Leadership Team aware of trends in behaviour that may affect pupil welfare. If necessary, training will be arranged.

All staff and volunteers should be aware that the main categories of abuse are. See Appendix A:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

All staff and volunteers should be concerned about a child if he/she presents with indicators of possible significant harm – see Appendix A for details.

Good practice guidelines and staff code of conduct

To meet and maintain our responsibilities towards pupils we need to agree standards of good practice which form a code of conduct for all staff.

Good practice includes:

- treating all pupils with respect.
- setting a good example by conducting ourselves appropriately.
- involving pupils in decisions that affect them.
- encouraging positive, respectful, and safe behaviour among pupils.
- being a good listener.
- being alert to changes in pupils' behaviour and to signs of abuse, neglect, and exploitation.
- recognising that challenging behaviour may be an indicator of abuse.
- reading and understanding the academy's Safeguarding and Child protection policy, Staff Behaviour policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, sexual violence and sexual harassment, physical contact, sexual exploitation, extremism, e-safety and information-sharing.
- asking the pupil's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid.
- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language.
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.
- applying the use of reasonable force only as a last resort and in compliance with academy and Local safeguarding Children's partnership procedures.
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary, directly to police or Children's Social Care.
- following the academy's rules with regard to relationships with pupils and communication with pupils, including on social media.

Please see Staff Code of Conduct Policy for more information

Abuse of position of Trust

All academy staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the academy staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

Children who may be particularly vulnerable

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment, or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- homeless
- disabled or have special educational needs
- Young Carers
- Looked After Children
- Previously Looked After Children
- Adopted Children
- affected by parental substance misuse, domestic abuse, or parental mental health needs (known as Trio of Vulnerabilities or The Toxic Trio)
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage and honour-based abuse
- at risk of being drawn into extremism
- homelessness is a term that is often misunderstood, with many people believing that the definition is restricted to those who sleep on the streets. However, the legal definition is far wider, and there are many instances in which a person would be considered legally homeless. An individual is considered to be homeless if they:
- have no home where they can live together with their immediate family
- can only stay where they are on a very temporary basis
- do not have permission to live where they are
- have been locked out of their home and are not allowed to return
- cannot live at home because of violence or threats of violence, which are likely to be carried out against them or someone else in their household
- live in a vehicle or boat and have nowhere to put it.

An individual will also be considered homeless if it is not reasonable for them to stay in their home, for example if:

- they cannot afford to stay where they are
- their home is in very poor condition.

Impact of homelessness upon children

Shelter, a national homelessness charity, produced guidance for academies which outlined the damaging impact that bad housing conditions can have on children's learning[1]. The report identified that homeless children have lower levels of academic achievement and higher levels of absence from academy.

Bad housing can impact upon a child's health and physical safety, reducing their ability to make a positive contribution throughout academy. It also significantly affects their opportunity to enjoy and achieve in life, which impacts strongly on their life chances. Children living in bad housing are nearly twice as likely as other children to leave academy without any GCSEs. This can then result in reduced employment opportunities.

Children living in temporary accommodation face a number of practical considerations including transport to and from academy, moving from one academy to another, and not having suitable space and equipment in which to do their homework. Often temporary accommodation is small, and space is shared with several family members. The lounge may double up as a bedroom; bed and breakfast accommodation can be just one room which has to accommodate an entire family, with no cooking facilities provided. In these circumstances it can be very difficult for children to complete or concentrate on homework tasks.

A range of emotional, behavioural, and social responses could be attributable to a child's housing situation.

Education professionals need to be aware of these circumstances, their effects on students, and to know how they can support children experiencing housing problems.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

Missing children

Attendance, absence, and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the academy day. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

CME – Children Missing Education

[1] https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/policy_library_folder/engaging_with_homeless_children_-_guidance_for_education_professionals

Knowing where children are during academy hours is an extremely important aspect of Safeguarding. Missing academy can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children. We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when young people are not at the academy. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the academy as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2021) the academy has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
- Leave academy to be home educated
- move away from the academy's location
- remain medically unfit beyond compulsory academy age
- are in custody for four months or more (and will not return to the academy afterwards); or
- are permanently excluded
- We will ensure that young people who are expected to attend the academy, but fail to take up the place will be referred to the local authority.
- When a young person leaves the academy, we will record the name of the pupil's new academy and their expected start date.
- Helping children to keep themselves safe
- Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education and sex and relationships lessons and through all aspects of academy life.

Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about e-safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The academy continually promotes an ethos of respect for children, and pupils are encouraged to speak to a member of staff of their choosing about any worries they may have.

Helping children to keep themselves safe

Children are taught to understand and manage risk through our Personal, Social, Health education (PSHE), Relationships and sex education (RSE) and health education lessons and through all aspects of academy life. Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about e-safety, the risks of sharing content and images online, sexual violence and sexual harassment and tackling bullying, including cyber bullying procedures. The academy continually promotes an ethos of respect for children, and pupils are encouraged to speak to a member of staff of their choosing about any worries they may have.

Support for those involved in a child protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support pupils, their families, and staff by:

- taking all suspicions and disclosures seriously.
- nominating a link person who will keep all parties informed and be the central point of contact.
- where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest.
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety.
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- storing records securely.
- offering details of helplines, counselling, or other avenues of external support.
- following the procedures laid down in our Safeguarding and Child protection, Whistleblowing, Complaints and Disciplinary procedures.
- cooperating fully with relevant statutory agencies.

Complaints procedure

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying, or belittling a pupil or discriminating against them in some way.

Complaints are managed by Senior Staff, the Principal and Governors.
An explanation of the complaint's procedure can be found on our academy website.

Complaints from staff are dealt with under the academy's Complaints and Disciplinary and Grievance procedures.

Complaints which escalate into a child protection concern will automatically be managed under the academy's Safeguarding and Child Protection procedures.

Whistle blowing if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The academy's whistleblowing policy enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Principal. Complaints about the Principal should be reported to the chair of governors, chair of the management committee or proprietor.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

https://www.gov.uk/whistleblowing
https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/

Allegations against staff

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

The principal/chair of governors will then follow the procedures set out in appendix I, if appropriate.

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

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils, and we must act on every allegation.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. In the event of suspension, the academy will provide support and a named contact for the member of staff.

The full procedures for dealing with allegations against staff can be found in *Keeping Children Safe in Education (DfE, 2021)* and in the academy's Managing Allegations policy and procedures.

Staff, parents, and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. Allegations concerning staff who no longer work at the academy, or historical allegations will be reported to the police.

An allegation relates to an adult who works with children (in a paid or unpaid capacity) and they have:

- behaved in a way that has harmed or may have harmed a child.
- possibly committed a criminal offence against, or related to, a child.
- behaved towards a child or children in a way that indicates they will pose a risk of harm if they work regularly or closely with children.

In these circumstances, the allegation should be taken seriously and the Principal, who has the responsibility for managing allegations against persons in a position of trust in academy, should be informed immediately.

It is not the responsibility of the person receiving the allegation to make any enquiries or discuss the allegation with anyone other than the Principal.

As with all other concerns about the welfare of children, the member of staff receiving the allegation should make a written record of the allegation using the informant's words - including time, date, and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated, and immediately passed on to the Principal.

Under no circumstances should the informant be asked to make a written record of the allegation or be asked to sign any documentation. This is the responsibility of the person receiving the allegation.

The Principal will not investigate the allegation itself, or take written or detailed statements, but will consult with the Local Authority Child Protection Officers, when appropriate, and if necessary, make a referral will be made to the LADO:

Sandwell - 0121 569 4770

If the Principal is implicated in the concerns, Chair of Governors should be informed immediately or, in their absence, the Vice Chair.

The same process will be followed by the Chair or Vice Chair of Governors as that followed by the Principal.

Concerns MUST be reported regarding any member of staff, volunteer, agency staff, governors, supply teacher or other. The academy have a responsibility to take action in relation to supply teachers, even though they are not their direct employer.

The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the academy or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

Concerns should be reported in relation to a person's conduct outside academy as this may not necessarily include a child directly but could be a situation such as Domestic Abuse.

The Chair of The Governing Body (equivalent to Chair of Governors) in this academy is:

NAME: Sir Mark Grundy

Trust Offices and Shireland Collegiate Academy
Waterloo Road,
Smethwick,
B66 4ND

0121 558 8086

info@collegiateacademy.org.uk

The same process will be followed by the Chair or Vice Chair of Governors as that followed by the Principal.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the Staff Handbook, academy Code of Conduct or Government document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings'.

If you have safeguarding or child protection concerns relating to the parents/carers of children and you are aware that they work with children, young people, or vulnerable adults, you must inform the DSL for child protection. This will allow for consideration to be given as to whether the position of trust process needs to be applied.

If it is decided that the allegation meets any of the three criteria outlined above, procedures will be followed in accordance with Local Safeguarding Children's partnership inter-Agency Procedures.

The Principal should, as soon as possible, and after consulting with the Local Authority Designated Officer inform the person against whom the allegation has been made of the concern.

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the academy's internal procedures.

It is imperative that staff understand that any concerns, no matter how small, will be responded to. Staff are to speak with the principal if they have concerned a colleague may have:

- 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 LADO.

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

- being over friendly with children.
- having favourites.
- taking photographs of children on their mobile phone.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

Staff training

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. Staff must understand their responsibilities in connection with education and understanding of sexual violence and sexual harassment.

This training will be regularly updated and will:

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

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

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

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

Volunteers will receive appropriate training, where applicable.

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect, and exploitation and to know what to do if they have a concern.

New staff and governors will receive a briefing during their induction, which includes the academy's Safeguarding Child Protection Policy and staff Behaviour Policy, reporting and recording arrangements, and details for the DSL. All staff, including the Principal and governors will receive training that is regularly updated, and the DSL will receive training updated at least every two years including training in inter-agency procedures.

Supply staff and other visiting staff will be given the Academy's Visiting Staff Leaflet

All staff will be made aware of the increased risk to abuse of certain groups, including disabled and SEN children, looked after children and young carers.

Safer recruitment

Our academy endeavours to ensure that we do our utmost to employ safe staff by following the guidance in Keeping Children Safe in Education (2021) together with the LCSP and the academy's Staff Recruitment policy and procedures.

Safer recruitment means that applicants will:

- complete an application form which includes their employment history and explains any gaps in that history.

- provide two referees, including at least one who can comment on the applicant's suitability to work with children.
- provide evidence of identity and qualifications.
- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include an enhanced DBS check and a barred list check for those engaged in regulated activity.
- if offered employment, provide evidence of their right to work in the UK.
- be interviewed, if shortlisted.

The academy will also:

- verify the preferred candidate's mental and physical fitness to carry out their work responsibilities
- obtain references for all shortlisted candidates, including internal candidates
- carry out additional or alternative checks for applicants who have lived or worked outside the UK
- ensure that applicants for teaching posts are not subject to a prohibition order issued by the Secretary of State.

At least one member of each recruitment panel will have attended Safer Recruitment training.

The staff in our academy who have received Safer Recruitment Training are:

- Rob Matthews
- Wendy Jackson
- Sarah Verrecchia

All members of the Human Resources Department are Safer recruitment trained and sit on interview panels.

All new members of staff will undergo an induction that includes familiarisation with the academy's Child Protection Policy and Staff Behaviour Policy and identification of their child protection training needs.

All staff sign to confirm they have received a copy of the Child Protection Policy and Staff Behaviour Policy.

All relevant staff (involved in early years settings and/or before or after academy care for children under eight) are made aware of the disqualification legislation and their obligations to disclose relevant information to the academy. All staff are reminded of this obligation at the time of appointment and annually.

The academy obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the academy have been appropriately checked.

Trainee teachers will be checked either by the academy or by the training provider, from whom written confirmation will be obtained.

The academy maintains a single central record of recruitment checks undertaken.

The DBS will consider whether to bar the person. Detailed guidance on when to refer to the DBS, and what information must be provided, can be found on www.GOV.UK

Referrals should be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from working in regulated activity, which could include being suspended, or is redeployed to work that is not regulated activity.

Regulated Activity

Academies are 'specified places' which means that the majority of staff and volunteers will be engaged in regulated activity. A fuller explanation of regulated activity can be found in Keeping Children Safe in Education (2021) part three.

Volunteers

Volunteers, including governors will undergo checks commensurate with their work in the academy and contact with pupils. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.

Supervised volunteers

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, in accordance with the academy's risk assessment process and statutory guidance.

Contractors

The academy checks the identity of all contractors working on site and requests DBS checks and barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised or engage in regulated activity.

Site security

Visitors to the academy, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their

children do not need to sign in. All visitors are expected to observe the academy's safeguarding and health and safety regulations to ensure children in academy are kept safe. The Principal will exercise professional judgment in determining whether any visitor should be escorted or supervised while on site.

Allegations of abuse made against other pupils

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 peer-on-peer abuse. However, all peer-on-peer 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
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, 'upskirting', 'downblousing' or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Procedures for dealing with allegations of peer-on-peer 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
- Pupils must be supported, and assurance is to be given to them that they are believed and taken seriously
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Creating a supportive environment in academy and minimising the risk of peer-on-peer abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to report abuse using our reporting systems easily and confidently
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
    - That even if there are no reports of peer-on-peer abuse in academy, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - 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 play in preventing peer-on-peer 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

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

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

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

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

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

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 our local police community support officer by dialling 101.

Recording incidents

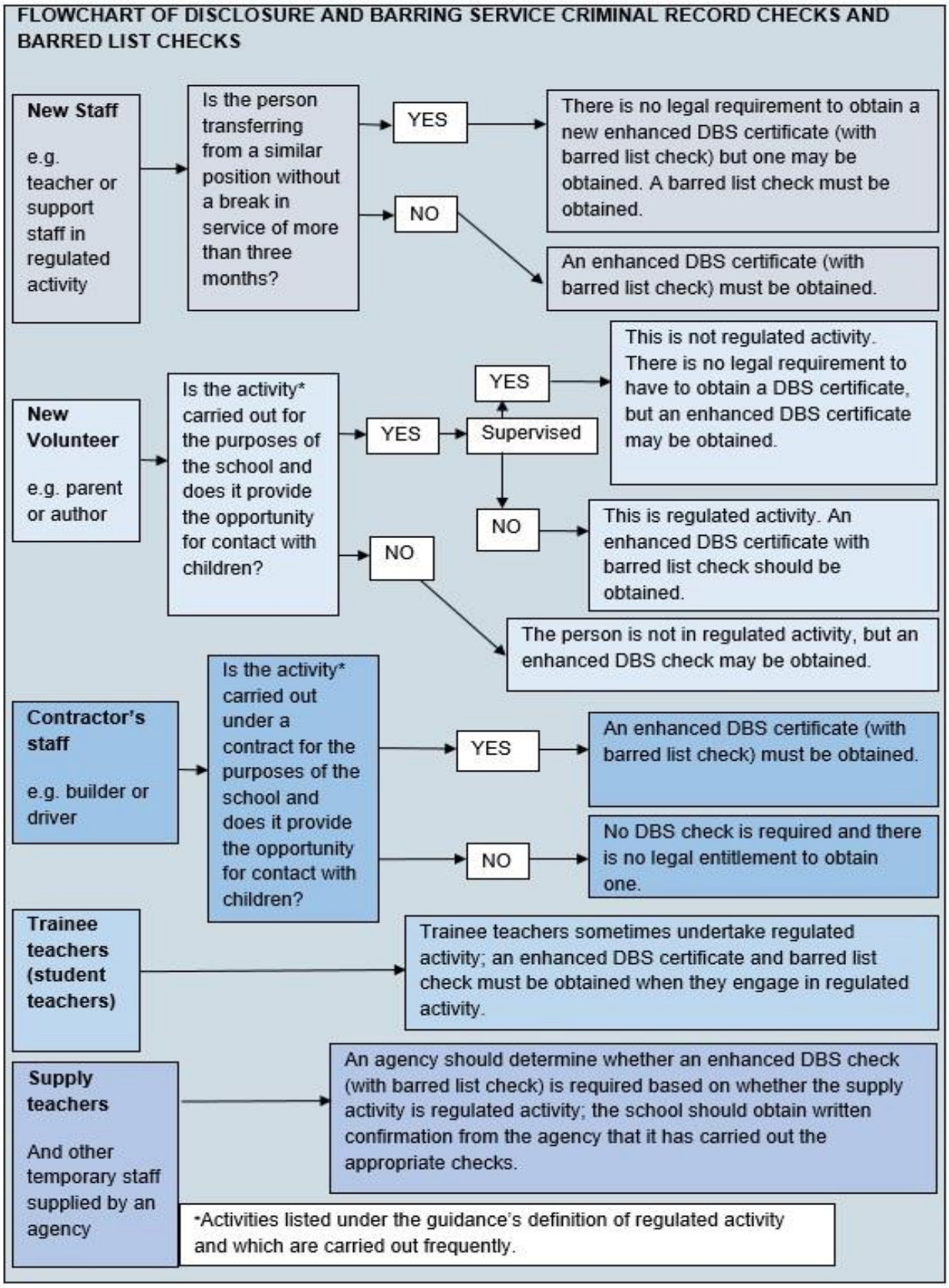
All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in this policy also apply to recording these incidents.

Curriculum coverage

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

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

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


FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS
New Staff
e.g. teacher or support staff in regulated activity
Is the person transferring from a similar position without a break in service of more than three months?
YES
There is no legal requirement to obtain a new enhanced DBS certificate (with barred list check) but one may be obtained. A barred list check must be obtained.
NO
An enhanced DBS certificate (with barred list check) must be obtained.
New Volunteer
e.g. parent or author
Is the activity* carried out for the purposes of the school and does it provide the opportunity for contact with children?
YES
Supervised
YES
This is not regulated activity. There is no legal requirement to have to obtain a DBS certificate, but an enhanced DBS certificate may be obtained.
NO
This is regulated activity. An enhanced DBS certificate with barred list check should be obtained.
NO
The person is not in regulated activity, but an enhanced DBS check may be obtained.
Contractor's staff
e.g. builder or driver
Is the activity* carried out under a contract for the purposes of the school and does it provide the opportunity for contact with children?
YES
An enhanced DBS certificate (with barred list check) must be obtained.
NO
No DBS check is required and there is no legal entitlement to obtain one.
Trainee teachers (student teachers)
Trainee teachers sometimes undertake regulated activity; an enhanced DBS certificate and barred list check must be obtained when they engage in regulated activity.
Supply teachers
And other temporary staff supplied by an agency
An agency should determine whether an enhanced DBS check (with barred list check) is required based on whether the supply activity is regulated activity; the school should obtain written confirmation from the agency that it has carried out the appropriate checks.
*Activities listed under the guidance's definition of regulated activity and which are carried out frequently.

Extended school and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the academy, our own Safeguarding and Child Protection policy and procedures apply. If other organisations provide services or activities on our site, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site educational provision, activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. Sadly, some people abuse children through taking or distributing images, so we must ensure that we have some safeguards in place.

To protect pupils, we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- use only the pupil's first name with an image
- ensure pupils are appropriately dressed
- encourage pupils to tell us if they are worried about any photographs that are taken of them.

Online Safety

Our pupils increasingly use electronic equipment on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Instagram, TikTok and many others. Parents/carers are reminded of the age restrictions and online safety in regards to age appropriate websites and mobile apps which their children may request to use, as many are not suitable for children of primary school age.

Unfortunately, some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Pupils may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

The academy Online Safety Policy explains how we try to keep pupils safe in the academy and protect and educate pupils in the safe use of technology. Cyberbullying and sexting by pupils will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Serious incidents may be managed in line with our Sexual Exploitation policy or Safeguarding and Child Protection procedures.

Many pupils own or have access to handheld devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

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 academy aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole academy 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 academy community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

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

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

- Educate pupils about online safety as part of our curriculum. For example:

    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to academy for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in 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
- 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 academy community

All staff receive e-safety training and the academy's e-safety coordinator is Kyle Smith.

Organisations for support

Organisation/Resource	What it does/provides
thinkuknow	NCA CEOPs advice on online safety
disrespectnobody	Home Office advice on healthy relationships, including sexting and pornography

UK safer internet centre	Contains a specialist helpline for UK academies and colleges
swgfl	Includes a template for setting out online safety policies
internet matters	Help for parents on how to keep their children safe online
parentzone	Help for parents on how to keep their children safe online
childnet cyberbullying	Guidance for schools on cyberbullying
pshe association	Guidance and useful teaching resources covering online safety issues including pornography and the sharing of sexual images
educateagainsthate	Practical advice for parents, teachers and governors on protecting children from extremism and radicalisation.
the use of social media for online radicalisation	A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
UKCCIS We follow this guidance provided by the UK Council for Child Internet Safety about Sexting	The UK Council for Child Internet Safety's website provides: Sexting advice Online safety: Questions for Governing Bodies Education for a connected world framework
NSPCC	NSPCC advice for schools and colleges
net-aware	NSPCC advice for parents
commonsensemedia	Independent reviews, age ratings, & other information about all types of media for children and their parents
searching screening and confiscation	Guidance to schools on searching children in schools and confiscating items such as mobile phones
lgfl	Advice and resources from the London Grid for Learning

Staff / Pupil relationships

The academy provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

Visiting Speakers' Policy

Although it has always been helpful for an academy to have clear guidance on the management of visiting speakers, the Prevent Duty set out that this is now an expectation.

"Specified authorities will need to…[have] robust safeguarding policies in place to identify children at risk…These policies should set out clear protocols for ensuring that any visiting speakers – whether invited by staff or by children themselves – are suitable and appropriately supervised". (Prevent Duty Guidance in England and Wales HM Government July 2015)

Key aspects of the visiting speakers' policy will include:

- A formal procedure for inviting speakers, which involves approval by the Principal and a clear understanding of why the speaker has been chosen.
- A list of appropriate checks on the suitability of the person, which may include internet searches and/or contacting other academies or schools where the person has spoken previously.
- Although not always possible, it is useful to invite speakers from an established company, charity or other group whose aims are well-documented.
- A document for the speaker to read and sign, to ensure that they understand they must abide by the school's equality commitments; that there must be no statements which might cause offence to others, or otherwise undermine tolerance of other faiths or beliefs; and there must be no extremist material.
- An understanding that the speaker will be expected to talk with staff about the content of the presentation before the event; speakers and staff must allow time for this discussion, whether it is on the day or beforehand.
- An understanding that such talks and presentations will not be used to raise funds, without the prior written permission of the Principal.
- Visiting speakers must arrive at reception in good time to book in, and must bring suitable identification. Although viewing DBS certificates may be appropriate, most visiting speakers will not be in 'regulated activity' and so will not necessarily have a DBS certificate to present.
- Visitors must be supervised at all times and not left alone with pupils, unless they have confirmed DBS checks.
- Visiting speakers should understand that their presentation will be brought to an early end, if the content proves unsuitable.
- All information about the visiting speaker and the booking process should be recorded on a suitable proforma.
- After the presentation, an evaluation form should be completed which will include feedback from staff, note any contentious subject areas or comments, and state whether the speaker could be booked again in the future. Once a person has visited an academy, future checks should be proportionate.

Dealing with a Disclosure

Where a pupil actually discloses that he/she has been abused the following guidelines must be followed:

Receive

- If a child wants to talk to you, never ask them to come back later. Ask them what they want to talk to you about and, if you are concerned about their welfare, give them the time to speak to you.
- Never promise confidentiality, inform the child that you are happy to talk to them but if they tell you anything that you believe may be putting them at harm that you will have to talk to someone.
- Listen carefully to the child. Do not stop a child who is freely recalling information.
- Where a child is visibly upset or has an obvious injury, it is good practice to ask a child why they are upset or how an injury was caused or respond to a child wanting to talk to you to help clarify vague concerns and result in the right action being taken.

React

- If you need to clarify information, ask open-ended questions e.g.," Is there anything you'd like to tell me?", "Can you explain to me…" Can you describe to me…?"
- Never ask leading or suggestive questions e.g. 'Did he/she do anything that they shouldn't have done?'
- Never ask 'accusing' questions e.g.," Why didn't you tell someone earlier?"
- Never criticise the alleged perpetrator, it may be someone that they will continue to live with.
- Never ask the pupil to repeat their disclosure for any other member of staff; it is your responsibility to share the information

- These four factors may compromise enquiries that need to be made later by Children's Social Care or Police.

Reassure

- Ensure that the child is aware that they have done the right thing in talking to you and that they have not done anything wrong.
- If you have any concerns that the child has been, or is at risk of harm, you must tell them that you will speak to someone to get help.

Record

- Make notes as soon as possible afterwards using the words that the child has used.
- Do not record your assumptions and interpretations, just what you heard and saw.
- Do not destroy original notes even if you later write things up more neatly and fully.
- Record the date, time and place of the disclosure.
- Sign any written records and identify your position in the academy setting.

- Do not ask a child to write an account or sign any of your documentation as this may compromise enquiries that need to be made later by children's social care or Police.

Refer

Immediately inform the DSL for child protection or in their absence the Deputy DSL for child protection who will be responsible for following the appropriate procedures. In the absence of anyone being available in academy, contact the Community Operating Group Social worker for advice.

To consult with your DSL for child protection does not mean a referral has been made. This decision is the responsibility of the DSL for child protection who will contact the appropriate agency as and when required.

If you are unhappy about the response you receive from your DSL for child protection, contact the Locality Community Operating Group (COG) for your area if applicable, or, in their absence, contact the MASH teams on:

Sandwell - 0121 569 3100

where you may be put through to speak to a qualified social worker.

UNDER NO CIRCUMSTANCES SHOULD YOU LEAVE ACADEMY WITHOUT DISCUSSING YOUR CONCERNS WITH SOMEONE.

Making a Referral

- A referral involves sharing information in line with Multi Agency Threshold Document to either the Early Help Team, with the consent of the parents/carers, Multi Agency Safeguarding Hub (MASH) or the Police in matters of immediate risk (see Appendix C).
- Parents/carers should be informed if a referral is being made except in the circumstances outlined in communication with parents
- However, inability to inform parents for any reason should not prevent a referral being made to Children's Social Care via the MASH Service. It would then become a joint decision with Children's Services about how and when the parents should be approached and by whom.
- If low level multi agency support is required for a child and/or their family, the DSL for child protection will, with consent of the parent/carer, refer to the Early Help Team to enable the most appropriate services and support to be identified. This may be targeted multi-agency support to help the family resolve any identified concerns.
- If the concerns are more complex and require statutory intervention, then the DSL for child protection will refer the matter to Children's Social Care via the MASH service where a decision will be made whether any enquiries are needed under Section 17 (child in need enquiry) or Section 47 (child protection enquiry) of the Children Act 1989. A flowchart can be found at Appendix D detailing the referral procedure.

How to make a referral to Children's Social Care if a child is at risk of significant harm

Step 1 - Complete a Multi-Agency Referral Form (MARF) and send into the MASH secure email address on the front of the form. Be prepared to give as much of the following information as possible using the SAFER guidelines (see Appendix B). If the child is aged 10 – 17 a CSE screening tool should also be completed.

Step 2 - If a child is at imminent significant risk of harm/immediate danger (and reporting concerns cannot wait an hour while a MARF is completed) the referrer should consider telephoning 999 and

Children's Social Care's MASH team:
Sandwell - 0121 569 3100

A MARF will also need to be completed without delay. (please be mindful that some local authorities do not call these MARFS. They may be called an Inter-Agency referral form or multi-agency contact form MAC)

Accurately record the action agreed following the referral or that no further action is to be taken and the reasons for this decision noting with whom discussions were held and who made the decisions on the appropriate academy form.

Concerns re: Terrorism / Radicalisation

Contact can be made with the confidential Anti-Terrorist Hotline 0800 789 321 or contact made with the LA Prevent Strategy Coordinator for further advice.

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

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

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

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

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

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

Contact can be made with the confidential Anti-Terrorist Hotline 0800 789 321 or contact made with the LA Prevent Strategy Coordinator for further advice.

Gypsy, Roma and Traveller Children

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/181669/DFE-RR043.pdf

Children in Whom Illness is Fabricated or Induced (formerly known as Munchausen's Syndrome by Proxy)

This is a form of child abuse in which the parents or carers give false accounts of symptoms in their children and may fake signs of illness (to draw attention to themselves). They seek repeated medical investigations and needless treatment for their children. The government guidance on this is found in 'Safeguarding Children in whom illness is Fabricated of Induced' (15th March 2008). All suspicions of the above, must reported to the DSL.

Spiritual Abuse

Linked with emotional abuse, spiritual abuse could be defined as an abuse of power, often done in the name of God of Religion, which involves manipulating or coercing someone into thinking, saying or doing things without respecting their right to choose for themselves. Some indicators of spiritual abuse might be a leader who is intimidating and imposes their will on other people, perhaps threatening dire consequences or the wrath of God if disobeyed. They may say that God has revealed certain things to them and so they know what is right. Those under their leadership are fearful to challenge or disagree, believing they will lose the leader's (or more seriously God's) acceptance and approval. All suspicions of the above, must be reported to the DSL.

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 4 of this policy.

Any teacher who either:

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

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

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

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

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-academy to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from academy or college, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

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 reporting to the DSL.

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

All staff are aware that 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.

Academy staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

Pupils with special educational needs, disabilities or health issues

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

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

We offer extra pastoral support for these pupils. This includes a full programme of support which is tailored to the individual. Contact Kate Bennett or Wendy Jackson for further details.

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
- The provision of pastoral and/or academic support

Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff / volunteers in the academy.

All staff in the academy, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly Children's Social Care and the Police.

If a child wishes to confide in a member of staff / volunteer and requests that the information is kept secret, the member of staff / volunteer will tell the child, in an appropriate manner to the individual needs of the child, that they cannot promise confidentiality and may need to pass the information on to help keep the child or other children safe.

Staff / volunteers who receive information about children and their families in the course of their work should share that information within the expectations of the academy's confidentiality policy and other relevant policies e.g., the Safeguarding and Child Protection Policy, Local Children's Safeguarding Partnership and inter-agency procedures.

Communication with Parents

The academy will always discuss concerns with parents / carers, and consent for any referrals should be sought unless to do so would:

- place the child at risk of significant harm or further risk of significant harm.
- place a vulnerable adult at risk of harm

- compromise any enquiries that need to be undertaken by Children's Social Care or the Police

The academy will endeavour to ensure that parents have an understanding of the responsibilities placed on the academy and staff for safeguarding children.

Record Keeping

The importance of good clear child welfare and child protection record keeping has been highlighted in the learning from serious case reviews. Good up to date record keeping of concerns and action taken is essential for two main reasons:

It helps the academy identify causes for concern at an early stage. Often it is only when a number of seemingly minor issues are seen as a whole, that a pattern can be seen indicating safeguarding or child protection concern.

It helps the academy monitor and manage their safeguarding practices and provides evidence of robust and effective safeguarding policy and practice.

A record of a concern, suspicion or allegation should be made at the time of or as soon as possible after the event. Any member of staff receiving a disclosure of abuse from a child or young person or noticing signs or symptoms of possible abuse in a child or young person, will make a written record within the hour recording the disclosure using the child's own words, what was said or seen and the location both of the abuse and the disclosure. Dates and times of events should be recorded as accurately as possible, together with a note of when the record was made.

A record should be made of any visible marks or injuries to a child that give cause for concern, this may be completed on a body map the child should not be examined intimately or pictures taken of any injuries/marks.

All records must be signed and dated clearly with the name of the signatory clearly printed.
When a child has made a disclosure, the member of staff/volunteer should:

- Make brief notes as soon as possible after the conversation using the appropriate form utilised by the academy
- Not destroy the original notes in case they are needed by a court.
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child.
- Record statements and observations rather than interpretations or assumptions
- Distinguish fact from opinion.
- Children MUST NOT be asked to make a written statement themselves or to sign any records.
- All records of a child protection nature (handwritten or typed) are given to the DSL before the end of the working day. These should be filed in individual pupil files in Chronological order and a Chronology of significant events should be maintained at the front of the file.

- No copies should be retained by the member of staff or volunteer.
- The DSL will ensure that all safeguarding records are managed and transferred in accordance with the Education (Pupil Information) (England) Regulations 2005.

Electronic Record Keeping Software System:

www.myconcern.co.uk

We have switched to using an electronic record keeping software for reporting and recording safeguarding concerns. The advantages include less time-consuming paperwork and filing and being reassured that everything is reported and recorded in a timely manner. Some of the main benefits of using an electronic reporting system are as follows:

Chronology

A full chronology of events are stored against any concerns raised allowing you to easily see notes from meetings, interventions and behaviour reports.

Reporting

Creating reports is easy and within a few clicks you are able to see all concerns raised on a specific child. You can easily export or print the report for external agencies or meetings.

Anywhere

Our secure hosted option allows you to access the system from any device, anywhere where you have an internet connection. This also allows staff to raise concerns anywhere.

Alerts

The staff that need to know about any concerns that have been raised get alerts as they happen – Great for time-sensitive concerns.

Reviews

You can set reminders to prompt viewing of CP files, allowing you to keep track of referrals and action plans.

Body Maps

As well as online body maps, you can also combine body maps to review emerging patterns.

Dashboards

Multi-Academy Trusts, Local Authorities and Governors can have real time access to reports to a single academy or across a group of schools.

Tags

You can tag children in specific areas such as Child in Need, Young Carer and CP Plans. We also bring tags in from your MIS system such as FSM, SEN and PP.

Physical Interventions

It is important to allow children to do what they can for themselves, but depending on age and circumstances (i.e., a child who is hurt, who needs instruction in the use of a particular instrument/piece of equipment, safety issues such as the need to prevent a child hurting themselves or others), it may be necessary for some physical contact to take place.
Section 93 of the Education and Inspections Act 2006 enables school staff to use 'reasonable force' to prevent a pupil from:

- Committing any offence (or, for a pupil under the age of criminal responsibility, what would be an offence for an older pupil);
- Causing personal injury to, or damage to the property of, any person (including the pupil himself); or
- Prejudicing the maintenance of good order and discipline at the academy or among any pupils receiving education at the academy, whether during the teaching session or otherwise.

The general guidance on The Use of Reasonable force: Guidance for Head Teacher, staff and Governing Bodies (2013) and continues to be supplemented by a specialist guidance document, namely 'Guidance on the Use of Restrictive Physical Interventions for Staff working with Children and Adults who display Extreme Behaviour in Association with Learning Disability and/or Autistic Spectrum Disorders' (2012) and 'Guidance on the Use of Restrictive Physical Interventions for Pupil with Severe Behavioural Difficulties'. The circular entitled Guidance on the Use of Restrictive Physical Interventions for Staff Working with Children and Adults who display Extreme Behaviour in Association with Learning Disability and /or autism spectrum disorders applies to all special academy settings. Section 246 of the Apprenticeship, Skills, Children and Learning Act 2009 requires

The Governing Body to ensure that a procedure is in place for recording each significant incident in which a member of staff uses force on a pupil; and reporting each such incident to each parent of the pupil as soon as practicable after the incident. The member of staff must not report the incident to a parent if it appears to that member of staff that doing so would be likely to result in significant harm to the pupil. If that is the case, or if there is no parent of the pupil to whom the

incident could be reported, then the incident must be reported to the local authority where the pupil normally lives.

There is separate guidance on the use of force by staff in Further Education colleges: www.aoc.co.uk and applies to academy pupils who receive some of their education in an FE college.

Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Pupils report their concerns to class teachers in the first instance.

Statutory Academy policies

A full list of statutory policies can be found at https://www.gov.uk/government/publications/statutory-policies-for-schools . Note that none of these policies relate to safeguarding and child protection.

Other Recommended Policies;

- Anti-bullying
- Drugs and substance misuse
- E-Safety (including Acceptable Use Policies and Use of Digital Images)
- First aid (including management of medical conditions, intimate care)
- Management of allegations against staff
- PSHE curriculum
- Race, Disability and Equality Policy
- Recruitment and selection

- Physical Intervention
- Whistle blowing

Useful Telephone Numbers

- Sandwell MASH Team – 0121 569 3100
- Dudley MASH Team – 0300 555 0050
- Birmingham MASH Team – 0121 675 1669
- West Midlands Police – 101 or in an emergency 999
- Local Authority Child Protection Officers for Education – 0121 569 8144
- Sandwell Local Authority Designated Officer – 0121 569 4770
- Dudley Local Authority Designated Officer – 01384 813110
- Birmingham Local Authority Designated Officer – 0121 675 1669
- CCE Team – 0121 569 8690
- Prevent (Radicalisation and Extremism) Coordinator
- Prevent Worker – 0121 569 2201
- Tipton COG – 0121 569 7291
- Wednesbury COG – 0121 569 7294
- West Bromwich Central COG – 0121 569 7293
- Oldbury COG – 0121 569 7295
- Rowley COG – 0121 569 7296
- Smethwick COG – 0121 569 7297

APPENDIX A: DEFINITIONS OF ABUSE AND NEGLECT

Physical Abuse

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.

Signs of possible physical abuse

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games.
- Injuries which have not received medical attention.
- Reluctance to change for, or participate in, games or swimming.
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation.
- The child gives inconsistent accounts for the cause of injuries.

- Frozen watchfulness.

Possible effects of Physical Abuse

Physical abuse can lead directly to neurological damage, physical injuries, disability and in extreme cases death. Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural problems and learning difficulties.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another.
It may involve serious bullying (including cyberbullying),

causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Signs of possible Emotional Abuse

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy.
- Obsessions or phobias.
- Sudden underachievement or lack of concentration.
- Seeking adult attention and not mixing well with other children.
- Sleep or speech disorders.
- Negative statements about self.
- Highly aggressive or cruel to others.
- Extreme shyness or passivity.
- Running away, stealing and lying.

Possible effects of Emotional Abuse

- If a child suffers sustained emotional abuse, there is increasing evidence of adverse long-term effects on their development. Emotional abuse has a significant impact on a developing child's mental health, behaviour and self-esteem. It can be especially damaging in infancy and can be as important as the other more visible forms of abuse, in terms of its impact on the child. Domestic Abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse.
- Domestic Abuse comes in many forms and is not just physical but can be:
- Emotional
- Sexual
- Financial
- Controlling and coercive
- Physical
- Exposure to Domestic Abuse and /or violence, can have a serious, long lasting emotional and psychological impact on young people.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.
The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include 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, 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.

Signs of possible Sexual Abuse

- Any allegations made by a child concerning sexual abuse.
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age.
- Sexual activity through words, play or drawing.
- Repeated urinary infections or unexplained stomach pains.
- The child is sexually provocative or seductive with adults.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations.
- Eating disorders such as anorexia or bulimia.

Possible effects of Sexual Abuse

- Disturbed behaviour including self-harm,
- inappropriate sexual behaviour,
- sadness, depression and loss of self-esteem has all been linked to sexual abuse.
- Its adverse effects may last long into adult life. The severity of the impact on the child is believed to increase the longer the abuse continues, the more serious the abuse, the younger the child at the start, and the closeness of the relationship to the abuser. The child's ability to cope with the experience of sexual abuse, once recognised, can be strengthened by the support of a non-abusive adult carer who believes the child, helps the child understand the abuse, and is able to offer help and protection. Some adults who sexually abuse children were themselves sexually abused as children.

Child Sexual Exploitation

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

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

Possible signs of child sexual exploitation

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Exclusion or unexplained absences from academy, college or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Possible effects

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.

- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:
Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Sandwell Criminal Exploitation Hub are striving to coordinate intellegince by;

- CSE Mapping and intelligence: perpetrators, areas, links, trends
- Hotels and taxis and events
- Multi Agency Safeguarding Hub (MASH) has the following support
    - Targeted Youth Support
    - Women's Aid
    - Barnardos
    - Specialist CSE Social Workers

CSE Screening Tool MUST be completed in Sandwell for ALL children aged 10-18 who are subject to an Early Help Assessment or a MARF. For further information see guidance sheets regarding CSE support from CSE team within Sandwell MASH.

Complete the CSE Screening Tool when completing a MARF or EHA
http://www.sandwelllscb.org.uk/site/whats_new.html

Use the online CSE Tool from Brook
https://www.brook.org.uk/our-work/cse-e-learning-tool

Child Criminal Exploitation

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

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

Possible signs of CCE

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.

- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".'

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Criminal Exploitation Hubs strive to coordinate intellegince by;

- CSE Mapping and intelligence: perpetrators, areas, links, trends
- Hotels and taxis and events
- Multi Agency Safeguarding Hub (MASH) has the following support
- Targeted Youth Support
- Women's Aid
- Barnardos
- Specialist CSE Social Workers

CSE Screening Tool MUST be completed for ALL children aged 10-18 who are subject to an Early Help Assessment or a MARF. For further information see guidance sheets regarding CSE support from CSE team within MASH.

Complete the CSE Screening Tool when completing a MARF or EHA

Use the online CSE Tool from Brook
https://www.brook.org.uk/our-work/cse-e-learning-tool

Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs of possible Neglect

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to
- Frequently hungry
- Overeating junk food

Possible effects of Neglect

Neglect can seriously impair a child's health, physical and intellectual growth and development, and can cause long term difficulties with social functioning, relationships and educational progress. Extreme cases of neglect can cause death.

For further information about neglect please see Sandwell Children's Safeguarding Partnership's neglect policy.

Private Fostering

There is a mandatory duty on the academy to inform the local authority of a private fostering arrangement they are aware of.

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

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

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

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

The academy has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although academies have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the academy. However, it should be clear to the academy who has parental responsibility.

Staff are trained to advise the DSL when they become aware of a change of living circumstances for any child. Staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The academy itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered.

Forced Marriage (FM)

this is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic abuse. Young men and women can be at risk in affected ethnic groups. Whistleblowing may come from younger siblings.

Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a academy or through a third party.

Forced marriage is a CRIME. It is a form of violence against women and men, domestic abuse, a serious abuse of human rights, and where a minor is involved, child abuse. ·

While it is important to have an understanding of the motives that drive parents to force their children to marry, these motives should not be accepted as justification for denying them the right to choose a marriage partner and enter freely into marriage. ·

A person's capacity to consent can change. With the right support and knowledge, a person with a learning disability may move from a position of lacking capacity to consent to marriage, to having capacity. However, some children and adults with learning disabilities are given no choice and/or do not have the capacity to give informed consent to marriage and all it entails.

The Forced Marriage Unit (FMU) is a joint Foreign and Commonwealth Office and Home Office unit was which set up in January 2005 to lead on the Government's forced marriage policy, outreach

and casework. It operates both inside the UK, where support is provided to any individual, and overseas, where consular assistance is provided to British nationals, including dual nationals.

The FMU operates a public helpline to provide advice and support to victims of forced marriage as well as to professionals dealing with cases. The assistance provided ranges from simple safety advice, through to aiding a victim to prevent their unwanted spouse moving to the UK ('reluctant sponsor' cases), and, in extreme circumstances, to rescues of victims held against their will overseas.

The FMU undertake an extensive outreach and training programme of around 100 events a year, targeting both professionals and potential victims. The FMU also carry out media campaigns, such as 2015's 'right to choose' campaign, where the FMU commissioned a short film to raise awareness amongst young people at risk of being forced into marriage, as well as potential perpetrators.

Contact

Telephone: +44 (0) 20 7008 0151
Email: fmu@fco.gov.uk
Email for outreach work: fmuoutreach@fco.gov.uk
Facebook: Forced Marriage page
Twitter: @FMUnit

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

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

Types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris
Type 2 Excision – partial/total removal of clitoris and labia minora
Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

When should a referral be considered?

Mandatory reporting 2015

Under 18 & FGM is 'Known'
Seen
Disclosed
Report to POLICE

Suspected or At Risk?

Usual Safeguarding procedure

Worried about FGM?

Call the FGM helpline if you're worried a child is at risk of, or has had, FGM.
It's free, anonymous and we're here 24/7.

0800 028 3550 or email fgmhelp@nspcc.org.uk

Useful Sources of Information:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/469448/FGM-Mandatory-Reporting-procedural-info-FINAL.pdf
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/416323/Fact_sheet_-_FGM_-_

Why is it carried out? There is a belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from academy and other activities
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings take action without delay.

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, this includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.
Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Mental Health

This policy covers the importance and responsbiltiy for safeguading young people and their physical and emotional health and wellbeing. This includes their mental health.

Our staff are committed to supporting children with mental ill health and all staff are aware that mental health can, in cases, be an indicator that a child has suffered abuse, neglect or exploitation.

We provide training to our staff in relation to the improtance of understanding and recoginsing mental health issues in young people as they are often best placed to be able to identify concerns and refer to the DSL for further support and referral.

Children missing from education

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

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend an academy
- 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 academy without a new academy 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.

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.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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 academy (usually the designated safeguarding lead) before the child or children arrive at the academy the following day.

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

The Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

Definition

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

(a) physical or sexual abuse.

(b) violent or threatening behaviour.

(c) controlling or coercive behaviour.

(d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and

(e) psychological, emotional or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Our academy supports Operation Encompass and works in collaboration with West Midlands Police and the Local Authority.

Operation Encompass is the reporting to schools, prior to the start of the next school day, when a child or young person has been exposed to, or involved in, any domestic incident.

Operation Encompass ensures that a member of the academy staff, knows as a Key Adult, is trained to allow them to liaise with the local authority and to use the information that has been shared, in confidence, while ensuring that the academy is able to make provision for possible difficulties experienced by children, or their families, who have been involved in, or exposed to, a domestic abuse incident.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

APPENDIX B

Aide-memoire for Professionals to support efficient and appropriate telephone referrals of children who may be suffering, or are likely to suffer, significant harm

Situation

- I am (give your name / designation / base). I am calling about (child's name(s) / date of birth / address, or mother's details if an unborn child).
- I am calling because I believe this child is at risk of harm.
- The parents are/aren't aware of the referral.

Assessment and actions

- I have assessed the child and the specific concerns are (provide specific factual evidence, ensuring the points in Section A are covered).
- Or: I fear for the child's safety because (provide specific facts – what you have seen, heard and/or been told).
- An Early Help Assessment has/hasn't been completed / followed prior to this referral.
- The child is now (describe current condition and whereabouts).
- I have not been able to assess the child, but I am concerned because ...
- I have (actions taken to make the child safe).

Family factors

Specific family factors making this child at risk of significant harm are (based on the Assessment of Need Framework i.e., parenting capacity, family/environment, child's developmental needs)

Expected response

In line with "Safeguarding Children and Safer Recruitment in Education 2007", "Working Together to Safeguard Children 2018" and Section 17 and / or Section 47 of the Children Act I recommend that a specialist social care assessment is undertaken (urgently?).

Other recommendations.
Ask: Do you need me to do anything now?

Referral and recording

I will follow up with a written referral MARF and would appreciate it if you would get back to me as soon as you have decided your course of action.
Exchange names and contact details with the person taking the referral.
Now complete the MARF ensuring that it is sent within 24 hours and record details and time and outcomes of telephone referral.

APPENDIX C - Child protection and the use of shared sports facilities:

This policy brings together two really important themes for our young people; being fit and active and keeping safe. All of us who are involved in the many agencies that support our children recognise the enjoyment and health benefits that sport can play in their lives.

Sport has a lot to offer our children. Sports organisations reach a broad audience of young people. Sport can and does have a very powerful and positive influence on young people. It can provide valuable opportunities for success, enjoyment, achievement, personal and social development and development of positive life skills. It can help develop their self-esteem, leadership and teamwork skills. It contributes to a healthy lifestyle by encouraging young people's physical, mental and emotional well-being.

All guidance within this section of the policy should be read in conjunction with the '*Safer in Sports Leaflet' – DfES*

To ensure the safety and wellbeing of young people using sports facilities within a shared environment, a member of staff must always be present whilst using the facility.

Staff must ensure the changing room is not being used by adults at the time children are to use them. This also applies to the use of toilet facilities.

Adults should not change or shower at the same time as the young people using the same facility. Young people should be supervised at all times in the changing rooms by a member of staff or volunteer of the same sex.

If any young person is uncomfortable changing or showering in public, no pressure should be placed on them to do so. In this instance, encourage them to change or shower at home.
If the activity is mixed gender, separate changing facilities should be made available.
Parents should be informed on an annual basis that facilities are offsite and the site is open to the public.

The offsite facility must have their own Child Protection Policy and have a designated welfare officer to deal with any issues.

APPENDIX D The role of the Head Teacher

- Put in place procedures for handling cases of suspected abuse (including allegations against staff and volunteers) which are consistent with those agreed by Sandwell Children's Safeguarding Partnership and easily available to all staff and volunteers for reference.
- Be responsible for following local procedures for allegations against persons in a position of trust and attend all relevant meetings when required.
- Liaise with the nominated Governor on child protection issues and the academy policy.
- Appoint a designated safeguarding lead for child protection to co-ordinate action within the academy and liaise with other agencies, as appropriate, on suspected cases of safeguarding and child protection.
- Ensure that the designated safeguarding lead for child protection receives appropriate training and support.
- Understand the role of the designated safeguarding lead for child protection.
- Ensure that all staff know and are alert to signs of possible abuse and know what to do if they have any concerns or suspicions.
- Make parents aware of the academy Safeguarding and Child Protection Policy.
- Work with appropriate local partners to create a safe environment for children at the academy.
- Make certain that when academy premises are used by members of the public; care is taken to ensure that children are not placed at risk. Where activities take place during the academy day, the academy and its Governing Body need to ensure that effective arrangements are in place.
- Ensure when services or activities are provided directly by academy staff the academy arrangements for child protection will apply.
- Ensure when services or activities are provided separately by a third party, The Governing Body should seek assurance that the body concerned has appropriate policies and procedures in place and that written agreements make clear the lines of accountability. Consideration should be given, when approving a letting, as to the backgrounds of the individuals making use of the premises. A risk assessment should be conducted prior to any letting taking place; the ultimate responsibility for approving lettings rests with The Governing Body of the academy.

The role of the Designated Safeguarding Lead for Child Protection

This role is key to ensuring that proper procedures and policies are in place and are followed with regard to child protection issues and that there is a dedicated resource available for other staff, volunteers and governors to draw upon.

The designated safeguarding lead for child protection should be a senior member of the academy leadership team who is designated to take lead responsibility for dealing with child protection issues, providing advice and support to other staff, liaising with the local authority (LA), and working with other agencies.

The designated safeguarding lead need not be a teacher but must have the status and authority within the academy management structure to carry out the duties of the post including committing resources to child protection matters, and where appropriate directing other staff.

Broad areas of responsibility proposed for the DSL for Child Protection

Referrals:

- Support vulnerable children / families or refer cases of suspected abuse to the relevant service or investigating agency.
- act as a source of support, advice and expertise within the academy when deciding whether to make a referral by liaising with relevant agencies.
- liaise with Principal to inform them of any issues and ongoing investigations and ensure there is always cover for this role.

Training:

- to recognise how to identify signs of abuse and when it is appropriate to make a referral.
- have a working knowledge of how the Sandwell Quality Assurance Unit operates, the conduct of a child protection case 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 academy's Child Protection Policy especially new or part time staff who may work with different educational establishments.
- ensure all staff have induction training covering child protection and are able to recognise and report any concerns immediately they arise including trainee teachers and supply teachers.
- be able to keep detailed accurate secure written records of referrals/concerns.
- obtain access to resources and attend any relevant or refresher training courses at least every two years.

Raising Awareness:

- ensure the academy's Child Protection Policy is updated and reviewed annually and work with The Governing Body regarding this.
- ensure parents/carers see copies of the Child Protection Policy to ensure they are aware of the fact that referrals may be made and the role of the academy therein.
- where children leave the establishment, ensure their child protection file is copied for the new establishment as soon as possible but transferred separately from main student file. If a child leaves and the new academy is not known, the appropriate process is used so that these children can be included on the database for lost students.
- Although the designated safeguarding lead for child protection is responsible for following safeguarding and child protection procedures, it is not their responsibility or that of other academy staff in academies to investigate suspected abuse. No further action should be

taken than those defined in the academy Child Protection Policy, inappropriate action may compromise further action.

The role of The Governing Body is to:

- have a signed Safeguarding and Child Protection Policy and procedures in place that are in accordance with procedures issued by the Sandwell Children's Safeguarding Partnership procedures as well as relevant legislation and ensure the policy is made available to parents on request.
- operate safe recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children, including Enhanced DBS checks as defined in the guidance issued by the Independent Safeguarding Authority (ISA)
- have procedures for dealing with allegations of abuse against members of staff and volunteers that comply with local guidance.
- have a senior member of the academy's leadership team who is designated to take lead responsibility for dealing with child protection issues, providing advice and support to other staff, liaising with the LA, and working with other agencies and ensure that they undertake training relevant to their role at least every 2 years.
- ensure the Principal, and all other staff who work with children undertake appropriate training to equip them to carry out their responsibilities for child protection effectively, that is kept up to date by refresher training annually, and that temporary staff and volunteers who work with children are made aware of the academy's arrangements for child protection and their responsibilities;
- remedy any deficiencies or weaknesses in regard to child protection arrangements that are brought to its attention without delay.
- ensure that a member of The Governing Body is nominated to be responsible for liaising with the LA and/or partner agencies, as appropriate in the event of allegations of abuse being made against the Principal.
- review its policies and procedures annually and provides information to the LA about them and about how safeguarding and child protection duties have been discharged.
- recognise the contribution the academy can make to helping children keep safe through the PSHE curriculum.
- ensure that there are safe and effective recruitment policies and disciplinary procedures in place which adhere to current legislation.
- appoint an individual member of The Governing Body to champion child protection issues within the academy, liaise with the Principal/ DSL about them, and provide information and reports to the Standards and Performance Committee. It is not appropriate for that person to take the lead in dealing with allegations of abuse made against the Principal. That is more properly the role of the Chair of Governors or, in the absence of a chair, the vice/deputy chair.
- Make certain that when academy premises are used by members of the public; care is taken to ensure that children are not placed at risk. Where activities take place during the academy day, the academy and its Governing Body need to ensure that effective arrangements are in place.

- Ensure when services or activities are provided directly by academy staff the academy's arrangements for child protection will apply.
- Ensure when services or activities are provided separately by a third party, The Governing Body should seek assurance that the body concerned has appropriate policies and procedures in place and that written agreements make clear the lines of accountability. Consideration should be given, when approving a letting, as to the backgrounds of the individuals making use of the premises. A risk assessment should be conducted prior to any letting taking place; the ultimate responsibility for approving lettings rests with The Governing Body of the academy.
- Whether The Governing Body acts collectively or an individual member takes the child protection lead, it is imperative that all governors undertake child protection training to understand the processes that the academy should follow.

APPENDIX E

www.nspcc.org.uk

Why looked after children are a priority?
There are around 90,000 children in care at any one time in the UK (see statistics). The majority enter care because of abuse and neglect and 45% have a diagnosable mental health condition (Meltzer et al, 2003). For these children care is a vital part of our child protection and family support system.

Thanks to dedicated carers and other professionals there have been significant improvements to the care system in recent years and the government has made improving care a priority. But care still fails some of our most vulnerable children, with too many going on to have poor experiences in care or after they leave.

Generally, children in care continue to have poorer outcomes than the wider population – particularly in relation to educational achievement, homelessness, and mental health. It is difficult to determine the extent to which these outcomes were caused by the child's experiences prior to coming into care, rather than their experiences once in care. However, we do know that further support is needed to help these children and young people overcome the effects of the abuse and neglect they have suffered.

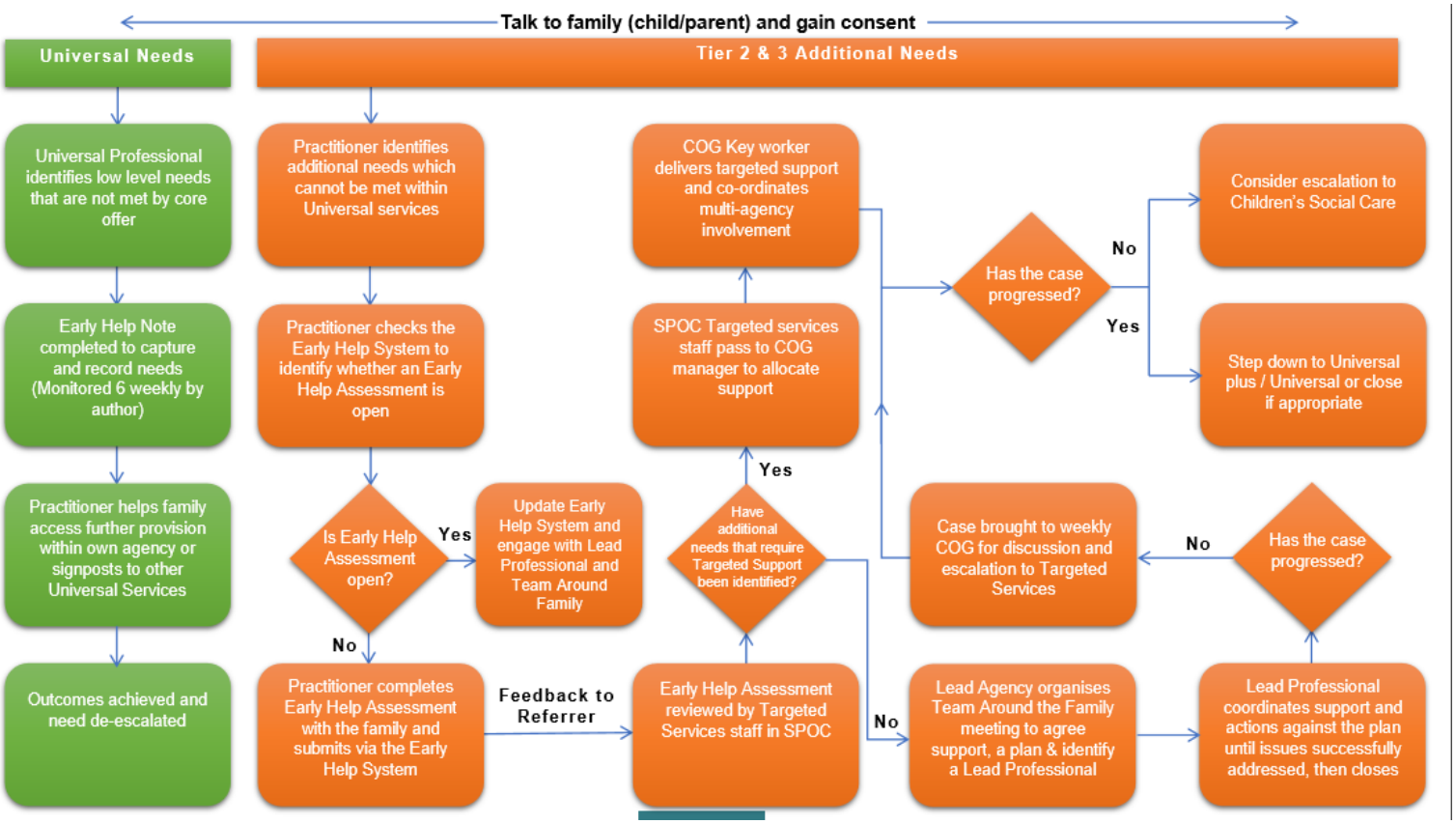
It is wrong to assume all children in care are kept safe. A minority are at continued risk of abuse or neglect, including from their carers, other young people and those in the wider community who target them.

Children in care who call ChildLine tell us that they continue to feel vulnerable and isolated, leaving them at risk of harm. For some, care does too little to compensate for the harm they have already suffered and for others the care experience compounds that harm (see Looked after children talking to ChildLine, 2011).

Better support is needed to help these young people overcome the effects of the abuse and neglect they have suffered and to enable them to realise their potential. Care must provide effective therapeutic support for children and young people and protect them from current and future harm.

The NSPCC is committed to ensuring care provides a positive, supportive experience for all looked after children.

APPENDIX F: Process Map



APPENDIX G Safeguarding Guidance

PREVENT

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.

Academies 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 academy 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 academy 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.

Further information on the academy's measures to prevent radicalisation are set out in other academy policies and procedures, including [list any relevant policies here – for example you may cover this in your curriculum policy, behaviour policy, online/e-safety policy, and/or others].

Serious violence

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

- Increased absence from academy
- 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 academy
- 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.

Definition:

In order for academies and childcare providers to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of academies' and childcare providers' wider safeguarding duties and is similar in nature to protecting children from other harms (e.g., drugs, gangs, neglect, sexual exploitation) whether these come from within their family or are the product of outside influences.

Physical and Behavioural Observations:

- Concerning things the young person may say
- Having strong values and beliefs
- Often going beyond the norms of society, but this is subjective as what is the norm in one society or community may not be the room for another
- It can be a strong view with no room for manoeuvre
- Fostering hatred, causing inter-community conflict
- Engaging in physical violence against conflicting values
- Presenting threatening behaviour causing bodily and mental harm
- Essentially a move to action

Action to be considered:

As explained above, if a member of staff in a academy has a concern about a particular young person they should follow the academy's normal safeguarding procedures, including discussing with the academy's Designated Safeguarding Lead for Child Protection, and where deemed necessary, with Children's Social Care.

In Prevent priority areas, the local authority will have a Prevent lead who can also provide support. You can also contact your local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice.

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk

Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed

IF YOU HOLD THE INFORMATION, YOU HOLD THE RISK!

Support with Referrals

Thresholds Document

Sandwell
http://www.sandwelllscb.org.uk/site/pdfs/multi_agency_threshold_20140805.pdf

Dudley
https://safeguarding.dudley.gov.uk/media/12972/dudley-threshold-and-guidance-framework-june-2019.pdf

Birmingham
http://www.lscpbirmingham.org.uk/delivering-effective-support

The Prevent Duty Guidance August 2015

https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

Counterterrorism and Security Bill

Factsheet – Part 5 Chapter 1 – 'Prevent'
DutyCTSBill@homeoffice.x.gsi.gov.uk

Referral System:

MARF Referral forms should be sent and copy in the Prevent Team and clearly marked Prevent.

Single Point of Contact (SPOC) for Prevent (Radicalisation and Extremism)
The SPOC within the academy is Rob Matthews.

Appendix H: Peer on Peer Abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of academy and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

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

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

If staff have any concerns about peer-on-peer 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 academy's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

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

Staff should be aware of the importance of:

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

If staff have any concerns relating to sexual violence or sexual harassment, they will speak with the DSL immediately.
Further guidance can be found at:
https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges

KCSIE Updated 2020/ 2021 version
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Peer on peer abuse Children can abuse other children. This is generally referred to as peer-on-peer abuse and can take many forms.

This can include (but is not limited to).

- bullying (including cyberbullying).
- sexual violence and sexual harassment.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.

- sexting and initiating/hazing type violence and rituals.

Sexual violence and sexual harassment between children in schools and colleges.

Context Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual violence and sexual harassment?

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom.

Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Definition

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement.

- If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:
- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.
- If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Allegations of Abuse made against other Children

It is recognised that sometimes children are capable of abusing their peers. All children should be able to attend school and learn in a safe environment. When this is compromised by the actions or behaviours of their peers this will be dealt with through our behaviour policy.

Prevention is a fundamental method of minimising risks, and we will do this by:

- providing developmentally appropriate PSHE syllabus which develops students understanding of acceptable behaviour and keeping themselves safe
- having systems in place for any student to raise concerns with staff, knowing they will be listened to, believed and valued
- delivering targeted work on assertiveness and keeping safe to those pupils identified at risk
- developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils

Sometimes allegations are made of a specific safeguarding nature. These may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Some of the features of these could include:

- Allegations against an older pupil's behaviour towards a younger child
- Is of a serious nature possibly related to a criminal offence
- Indicates that other pupils have been affected by this pupil
- Taking part in sexting
- Photographing or videoing other children performing indecent acts
- Forcing others to use drugs or alcohol

Downblousing

The using of a mobile camera to take photos down one's blouse, shirt, or dress. This is usually done without the persons knowledge or consent.

Guidance

- Consideration will be given to whether the complaint raises a safeguarding concern and then report to the DSL.
- A factual record should be made but no attempt should be made to investigate at this stage,

- The DSL can discuss the case with advisory personnel such as the COG or the Education Safeguarding Officer to determine if a referral to MASH is required. If there is an indication that a criminal offence has been committed, then the police may become involved. School may be advised to refer this case to the police or advise parents to do so.
- The DSL will speak to parents of the victim(S) and the alleged perpetrator to inform them of the referral as long as it does not put either party at risk of further harm.
- Records of action and advise will be kept on both children's file
- Consideration will be given to whether the alleged perpetrator should be excluded from school according to the school's Behaviour Policy
- If Children Services decide there will be no further action a thorough investigation will be carried out in academy using the academy's usual disciplinary procedure
- If the academy, consider a safeguarding risk is still present then a full risk assessment will be carried out with a date set for follow up review.

Risks

Children are vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.

Professionals should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.

Professionals should be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.

The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse may have problems in their educational development and may have committed other offences. They may therefore be suffering, or at risk of suffering significant harm and in need of protection. Any long-term plan to reduce the risk posed by the alleged perpetrator must address their needs.

Protection and Action to be taken

It is not enough to respond to incidents as they arise: all agencies that work with children should strive to create an environment that actively discourages abuse and challenges the attitudes which underlie it.

Agencies should have a policy on bullying, and on sexual and racial harassment. They should also consider the effect of adult behaviour on children who may view them as role models.

Any professional who feels that a young person has abused another child or young person should notify children's social care without delay. They will arrange Strategy Discussion through the MASH which will include the referring agency and the police.

In order to give priority to them, issues relating to the safety of victims and potential victims must be discussed first and completely separately from any issues relating to the needs of the alleged perpetrator. This will usually require separate meetings.

The strategy discussion will consider:

- Whether the alleged perpetrator seems to pose a continuing risk to any child.
- How to protect any child who appears to be at immediate risk of significant harm.
- Whether section 47 enquiries should be initiated (or continued if they have already begun) and how they should be handled; and
- What action should be taken in respect of the alleged perpetrator, for example arranging a risk management meeting.
- It is important to co-ordinate action to address these issues: no agency should initiate action that has implications for another agency without appropriate consultation unless this is unavoidable in order to protect the safety of a child.

The Victim

The strategy discussion will consider what action is necessary to ensure the immediate safety of the identified victim(s) and what further enquiries are necessary to assess any further risk. A Child Protection Conference must be arranged unless the child does not appear to be at continuing risk of significant harm.

Where a young person has abused a sibling, planning must include consideration of the support needs of the parents. If victim and perpetrator are members of the same family/household, before making any arrangement to return the perpetrator to the family/household it is critical to ensure that the victim's views have been heard and that they feel safe.

A Child Protection Conference may conclude that the victim is not in need of a child protection plan but may be a child in need of support to address her/his needs arising from the abuse - for example referral to The Children's Society (formerly My Shield) Counselling Service, Beam, Krunch, Kooth, CAMHS or another victim support agency.

The Alleged Perpetrator

It is not always appropriate to initiate Section 47 Enquiries in respect of the alleged perpetrator unless there is information suggesting that they are at continuing risk of significant harm. However young people who abuse others frequently have considerable needs themselves, so an assessment of the alleged perpetrator's needs should be carried out.

Any decision on action in respect of the alleged perpetrator must be based on the risk they pose to other children and what can be done to minimise this risk. If the alleged perpetrator is over the

age of 10, consideration should also be given to whether action under the criminal justice system would be appropriate.

If there is evidence that the alleged perpetrator has also been the victim of abuse, the police will consider whether to initiate a separate criminal investigation relating to this.

The alleged perpetrator is likely to pose a continuing risk to others unless the opportunity for further abuse is ended and the young person and their family have agreed to work with relevant agencies to address the problem. It has also been proposed that the risk remains high unless the young person accepts responsibility for the abusive behaviour, but more recent research has suggested that in the case of sexually harmful behaviour, denial may be rooted in shame and a well-founded fear of consequences of admission. Consequently, while denial will have consequences for the treatment approach, it does not necessarily indicate that sexually harmful behaviour is likely to be repeated.

Assessment of an alleged perpetrator's needs will include consideration of:

- The nature, extent and context of the abusive behaviours.
- The young person's development and family and social circumstances.
- Whether the young person appears to pose a continuing risk and, if so -
  Who is likely to be at risk from him/her (for example self, other children, adults at risk, particular children, particular adults), and

The nature and degree of the risk.

- The young person's need for services, both those which relate to his/her harmful behaviour and other significant needs.
- Whether the young person is also at risk of significant harm and should be the subject of a child protection conference; and
- Whether action is to be taken within the criminal justice system.
- If there is a criminal case pending, the young person may have been instructed not to co-operate with an assessment and this must be taken into consideration when discussing the offence with them.
- If the assessments concludes that the young person poses a continuing risk to others, Children's Social Care will arrange a risk management meeting.

This meeting should be attended by:

- Persons who have responsibility for the welfare of any child who has been identified as currently being at risk from the perpetrator.
- Persons who have responsibility for the welfare of the perpetrator.
- Persons who have access to resources which are likely to be required to safeguard any child; and
- If the young person appears to pose a risk to adults at risk, adult social care and carers of any adult who has been identified as currently being at risk from him/her.

It is important to keep the risk management / strategy meeting separate from any child protection conference. The purpose of the risk management meeting is to reduce the risk which the perpetrator poses to children and adults at risk both at present and in the longer term.

This will include:

- Ensuring the safety of children who are likely to come into contact with the perpetrator in the immediate future.
- Action to address the perpetrator's behaviour and attitudes; and
- Monitoring progress.

The meeting will make recommendations and, where possible, will make commitments about action to be taken and resources to be provided for the safety of the children involved. Any recommendations should be based on the following assumptions:

A victim of abuse must not be left in contact with their abuser without adequate protection; and Moving the perpetrator away from the victim to another place where there are children may not reduce the overall risk to potential victims and may actually increase it.

The long-term control of risk may depend on an addressing any unmet needs of the perpetrator. This will be coordinated by children's social care.

Other children

The strategy discussion will consider:

- Whether the alleged perpetrator appears to pose a risk to any other children and young people or to adults at risk.
- Whether any further assessment of this risk is needed.
- What immediate action, if any, should be taken to minimise this risk; and
- Whether to initiate section 47 enquiries in respect of any of these children and young people.

Issues

Particular difficulties arise in responding to a child or young person who abuses another child because:

- There is no clear dividing line between abusive behaviour and normal childhood behaviour.
- Many adults who abuse children repeatedly established this pattern of behaviour in childhood or adolescence, but a single incident of abuse does not indicate that a young person is likely to abuse again; and
- Some young people who abuse have themselves been abused, but this cannot be assumed in any particular case.

The guiding principles for dealing with these situations are:

- The needs of the victim and the needs of the alleged perpetrator must be considered separately.
- In addition to safeguarding the identified victim, agencies must consider whether the alleged perpetrator seems to pose a risk to any other children.
- Children and young people who abuse others are responsible for their abusive behaviour, and safeguarding action must include addressing their behaviour and its causes.
- The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children.
- There should be a coordinated approach by child welfare, youth offending, education and health agencies. No agency should start a course of action that has implications for any other agency without appropriate consultation.

Appendix I: Allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

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

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates 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 academy

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

A 'case manager' will lead any investigation. This will be the principal, or the chair of governors [in independent academies: proprietor] where the principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the 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 [local authority/academy trust]

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the 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 academy 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. [Add further information here about the support available to individuals in your context, such as who they can turn to for advice – trade union representatives, or a colleague, for example – and any academy/local authority/trust arrangements for welfare counselling or medical advice]
- 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

Early years providers add:

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification

will be made as soon as reasonably possible and always within 14 days of the allegations being made.

All academies continue with:

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 academy's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the 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 taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the academy 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 is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the 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

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 academy'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. Amend or add to this as applicable to reflect your own approach.

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- 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 academy may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
- Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

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

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

The principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the academy's [staff behaviour policy/code of conduct].

[Add more detail about your procedures for responding to low-level concerns. Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concerns policy: A guide for organisations which work with children]

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the 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 guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the academy or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or

behaved or may have behaved in a way that indicates they may not be suitable to work with children.