



# Safeguarding and Child Protection Policy

[Overarching trust policy with specific details to be added by Embrace schools]

Embrace Multi Academy Trust strives to maintain and improve good provision and outcomes at each of its member schools. Based upon our shared ethos and our values of wisdom, collaboration, respect, integrity, inclusivity, and compassion, we aim to support the learning and development of every person within the trust and our policies are written from this perspective.

Version	Approval Level	Document History	Date	Review Period
V1	Full Trust Board	Approved	15/09/2023	Annually
V2	Full Trust Board	Updated as below and approved: <ul style="list-style-type: none"><li>• Pg 4 &amp; 5: Working Together to Safeguarding Children <b>2023</b></li><li>• Pg 4: new bullet in point 2, re sharing nudes/semi nudes</li><li>• Pg 6: additional wording in point 5, para 1, to clarify safeguarding arrangements for services and activities provided by school or other providers.</li></ul>	31/01/2024	Annually

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## Important Contacts

Role	Name	Contact Details
Headteacher / Principal	School specific	School specific
Designated Safeguarding Lead (DSL)	School specific	School specific
Deputy Designated Safeguarding Lead(s) (DDSL)	School specific	School specific
Senior Leader(s) to contact in the absence of the DSL/DDSL	School specific	School specific
Designated Safeguarding & Child Protection Governor	School specific	School specific
Trust DSL	Sharon Mullins	0116 482 0880
Designated Safeguarding and Child Protection Trustee	Russell Andrews	0116 482 0880
<a href="#">Leicester and the Leicestershire and Rutland Safeguarding Children Partnerships Procedures Manual</a>	<a href="#">Report Your Concerns about a Child or Young Person</a>	<a href="#">LCC report neglect or abuse</a>
LA Safeguarding Children in Education Officer	Charlotte Davis	0116 305 6314
LA Child Protection Contact / LADO	Kim Taylor Lovona Brown	<a href="mailto:CFS-LADO@leics.gov.uk">CFS-LADO@leics.gov.uk</a> 0116 305 4141 (Allegations Line) (Mon–Thurs, 8.30am–5pm / Fri, 8.30am–4.30pm) Outside of office hours, contact 0116 305 0005 (First Response) see below
Leicestershire First Response Children’s Duty Team	County Hall Championship Way Glenfield LE3 8RF	0116 305 0005 (for urgent concerns about a child who needs a social worker or police officer today) <a href="mailto:childrensduty@leics.gov.uk">childrensduty@leics.gov.uk</a>
Police		101 (to report a crime and immediate risk of harm or abuse to a child) or 999 (in an emergency only)
NSPCC Help/Whistleblowing Line		0800 028 0285 (for staff who do not feel able to raise concerns regarding child protection failures internally, or if they are concerned about the way a concern is being handled by their school) (Mon-Fri, 8am–8pm) or <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

## 1. Aims

Our school aims to ensure that:

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

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE) statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the [Female Genital Mutilation Act 2003](#), as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#) (Dec 2020)
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR).
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of

concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

- The [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](#).

This policy is consistent with:

- The legal duty to safeguard and promote the welfare of children, as described in [section 175 of the Education Act 2002](#) [or section 157 of the Education Act 2002 for independent schools and academies] and the statutory guidance “[Keeping children safe in education – Statutory guidance for schools and colleges](#)”, 2023 and “[Working Together to Safeguard Children](#)”, 2023.
- The Leicestershire and Rutland Safeguarding Children Partnership - [Multi-Agency Safeguarding Arrangements](#).

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

### 3. Definitions

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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

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

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

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

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

- 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.
- Taking action to enable all children to have the best outcomes.

**Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

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

- The local authority (LA).

- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.
- The chief officer of police for a police area in the LA area.

**The trust** is Embrace Multi Academy Trust.

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

## 4. Equality statement

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

We give special consideration to children who:

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

## 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and trust and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities. Where the governing board provides services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply. Where services or activities are provided separately by another provider, the governing board will seek assurance in writing that the provider concerned has appropriate policies and procedures in place to safeguard and protect children, based on the DfE guidance, "After-school clubs, community activities and tuition: safeguarding guidance for providers", (inspecting these where needed) and that there are arrangements to liaise with the school on these matters where appropriate. Safeguarding requirements will be included in any lease or hire agreement as a condition of use, and any failure to comply will lead to termination of the agreement. The headteacher will also take responsibility to inform the LADO about any allegations that arise against individuals or organisations who use the school premises.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/

misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships.
  - Boundaries and consent.
  - Stereotyping, prejudice and equality.
  - Body confidence and self-esteem.
- How to recognise an abusive relationship (including coercive and controlling behaviour).
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.
- What constitutes sexual harassment and sexual violence and why they are always unacceptable.

## 5.1. All Staff

Staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE) **and** Annex B of KCSIE (about specific safeguarding issues).

Staff who **do not** work directly with children are also expected to read part 1 of KCSIE.

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- Complete a declaration at the beginning of each academic year, or upon induction for new staff, to say that they have reviewed, read and understood the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (eg sites they need to visit or who they will be interacting with online).
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

The headteacher, and all other staff and volunteers who work with children (including early years practitioners within any settings on the school site), undertake appropriate training which is regularly updated at least annually (and more comprehensively, every three years in compliance with the Safeguarding Children Partnership protocol).

New staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities (including this policy, Part 1 of Keeping Children Safe in Education (or Annex A, if appropriate), the pupil behaviour policy, the staff behaviour policy (code of conduct), the role of the Designated Safeguarding Lead and how to respond to children who are absent or go missing from education).

The local authority induction leaflet, "Safeguarding in Education Induction – Child Protection Information, Safer Working Practice", will be used as part of this induction and Annex B from KCSIE is provided to all staff working directly with children.

All staff will be aware of:

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

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

## **5.2. The Designated Safeguarding Lead (DSL)**

The DSL is a member of the senior leadership team. [School specific details: name of their DSL and job title]. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

[School specific details: how to contact the DSL out of school hours].

When the DSL is absent, the DDSL(s) named on page 3 will act as cover.

If the DSL and DDSL(s) are not available, the senior leader(s) named on page 3 will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.

- Refer suspected cases, as appropriate, to the relevant body (LA children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and DDSL(s) are set out in their job description.

### **5.3. The Trust Board**

The trust board of Embrace Multi Academy Trust will:

- Ensure there is a named trust DSL and a named link trustee for safeguarding and child protection.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- Delegate authority for safeguarding to each school's local governing board.

### **5.4. The Local Governing Board**

The local governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Adopt this policy at each review and hold the headteacher to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a link safeguarding governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the three safeguarding partners.
- Ensure the school operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, it will ensure that the headteacher,

nominated governors and other staff involved in the recruitment process have undertaken 'safer recruitment' training.

- Ensure there is a senior member of the school's leadership team who is designated to take lead responsibility for dealing with child protection (the DSL) and that there is always cover for this role with appropriate arrangements for before/after school and out of term time activities.
- Ensure effective policies and procedures are in place and updated annually including a behaviour 'staff code of conduct' for staff and volunteers. This code of conduct incorporates all the areas addressed in the 'Guidance for Safer Working Practice for Those who Work With Children in Education Settings February 2022'. Information is provided to the LA (acting on behalf of the Safeguarding Children Partnership) through the 'safeguarding annual return'.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
  - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Seek assurance in writing that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- Ensure that the chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.
- Read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

## 5.5. The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction.
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Notifying the Local Authority Designated Officer (LADO) of allegations of abuse, or concerns that a member of staff or an adult working at school (or in an organisation using the school premises) may pose a risk of harm to children or young people, where the threshold is met.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- Ensuring the relevant staffing ratios are met, where applicable in EYFS settings.
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice regarding children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistleblowing helpline number is also available (0800 028 0285).
- Ensuring that all staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care (Children and Family Specialist Services) or the police.

## 5.6. Virtual School Heads

We will work closely with virtual school heads, who have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker/LAC.

They should also identify and engage with key professionals, eg DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

## 6. Confidentiality

We recognise that all matters relating to child protection are confidential; however, a member of staff must never guarantee confidentiality to children and children will not be given promises that any information about an allegation will not be shared.

Where there is a child protection concern, it will be passed immediately to the DSL and/or to children's social care. When a child is in immediate danger, children's social care/the police will be contacted. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

The headteacher or DSL will only disclose personal information about a pupil to other members of staff, including the level of involvement of other agencies, on a 'need to know' basis.

All staff are aware that they have a professional responsibility to share information with other agencies to safeguard children. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, or if it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Further guidance can be found by visiting Leicestershire and Rutland Safeguarding Children Partnership website: <https://lrsb.org.uk/>.

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

- There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
- The DSL should consider that:
  - Parents or carers should normally be informed (unless this would put the victim at greater risk).
  - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the local authority children's social care.
  - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this must be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The government's [information sharing advice for safeguarding practitioners](#) includes seven 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- We will adopt the information sharing principles detailed in statutory safeguarding guidance contained within:
  - DfE Keeping Children Safe in Education 2023 (which has several sections that provide clarity on information sharing processes and GDPR, including within Annex C which makes clear the powers to hold and use information when promoting children's welfare).
  - Working Together to Safeguard Children 2018 (paragraph 23-27 and pages 20-21).
  - Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents, and Carers (which has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018).
  - Leicestershire and Rutland Safeguarding Children Partnership (NSCP) Policy and Practice Guidance.

- If staff are in any doubt about sharing information, they should speak to the DSL (or DDSL).

Confidentiality is also addressed in this policy regarding record keeping in section 14.

## 7. Recognising Abuse and Taking Action

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

Please note that in this and subsequent sections, any references to the DSL mean either the DSL or DDSL.

### 7.1. If a child is suffering or likely to suffer harm, or in immediate danger

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly. For local procedures for making a referral, please see Appendix 5. The following link can also be used to report child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

### 7.2. If a child makes a disclosure to you

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

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

Bear in mind that some children:

- May not feel ready, or know how, to tell someone that they are being abused, exploited or neglected.
- May not recognise their experiences as harmful.
- May feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

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

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

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

FGM is illegal in the UK and is 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 should speak to the DSL and follow our local safeguarding procedures.

Staff will also follow the established safeguarding procedure by reporting any such concerns to the DSL and a report must also be made to the police. There will be a considered safeguarding response towards any girl who is identified as being at risk of FGM (eg there is a known history of practising FGM in her family, community or country of origin) which may include sensitive conversations with the girl and her family, sharing information with professionals from other agencies and/or making a referral to children's social care. If the risk of harm is imminent there are a number of emergency measures that can be taken including police protection, an FGM protection order and an Emergency Protection Order.

To report this in Leicestershire please follow this link [How to report FGM | Leicestershire Police \(leics.police.uk\)](https://www.leics.police.uk).

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

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

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

##### **Early help assessment**

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

agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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

Any professional or practitioner wanting to make a request for service to Leicestershire County Council including 'early help' or social care should complete the online MARSF. [Multi-Agency Referral Form for Early Help and Social Care services \(MARSF\) | Leicestershire County Council Professional Services Portal](#)

## **Referral**

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

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

Any professional or practitioner wanting to make a request for service to Leicestershire County Council including 'early help' or social care should complete the online MARSF. [Multi-Agency Referral Form for Early Help and Social Care services \(MARSF\) | Leicestershire County Council Professional Services Portal](#)

If it is felt necessary to escalate concerns this guidance can be followed [Resolving Practitioner Disagreements and Escalation of Concerns \(proceduresonline.com\)](#)

## **7.5. If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or is not 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 DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

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

## **7.6. If you have a concern about a child's mental health**

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

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

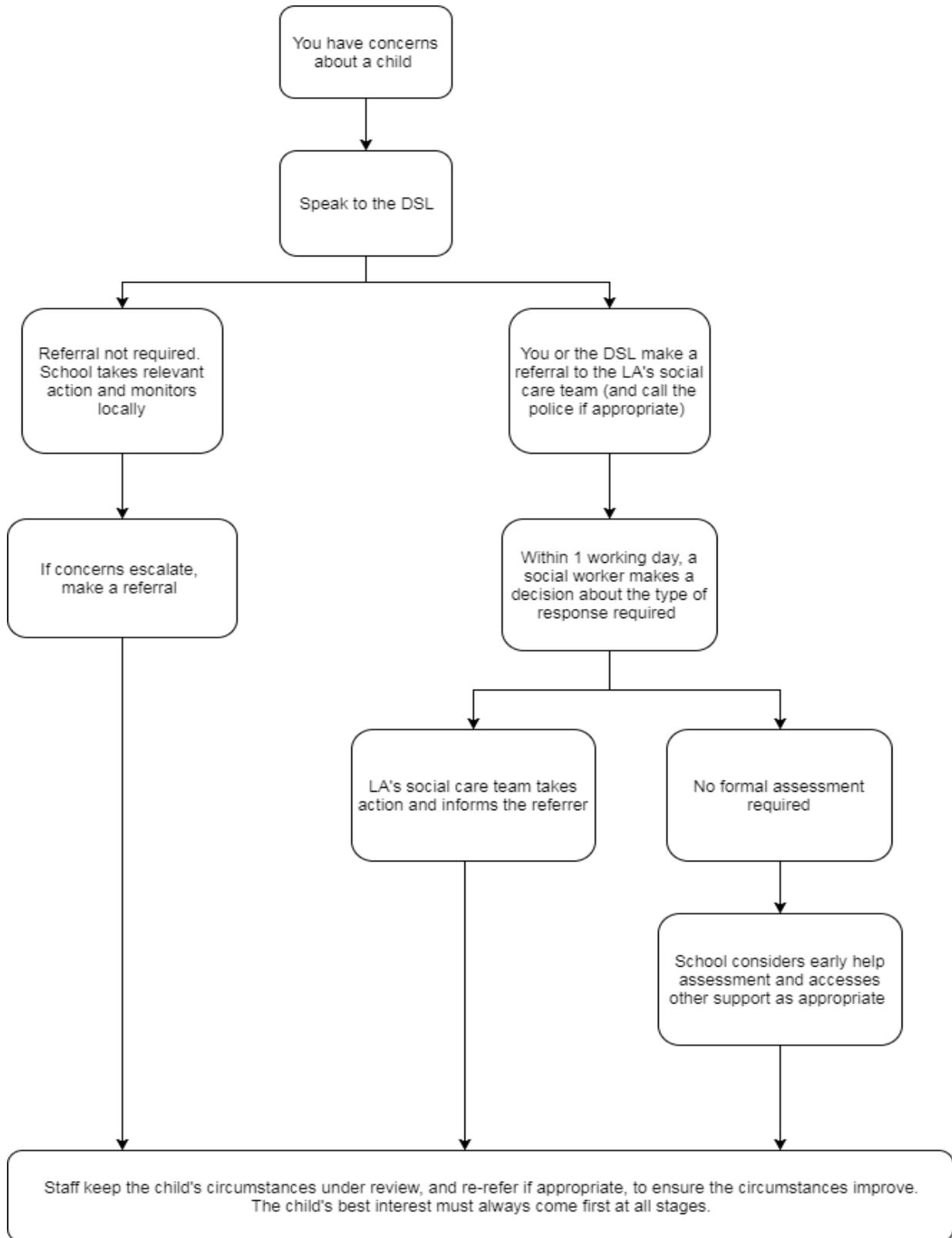
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

Refer to the DfE guidance on [mental health and behaviour in schools](#) for more information.

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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



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

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

The headteacher/chair of governors will then follow the procedures set out in the Embrace Multi Academy Trust allegations policy and low level concerns policy.

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow the school's school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate for early years providers, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

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

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

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

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

## **7.8. Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers and that even if no incidents have been reported they will have happened. Abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up', as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

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

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

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.

- Is violent.
- Involves pupils being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

See appendix 3 for more information about child-on-child abuse.

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

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

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

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

Details will be recorded on C-Poms and people who have alleged abuse against them, or witnessed the alleged abuse and those suspected of the abuse will be sign posted to the relevant support services.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders, eg, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils can easily and confidently report abuse using our reporting systems (as described in section 7.10 below).
- Ensure that staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening. Staff should maintain an attitude of 'it could happen here'.
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to.
    - A friend may make a report.
    - A member of staff may overhear a conversation.
    - A child's behaviour might indicate that something is wrong.
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
  - 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 child-on-child abuse and responding where they believe a child may be at risk from it.
  - That they should speak to the DSL if they have any concerns.
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

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

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

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

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

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

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

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) 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, their parents/carers or others' parents/carers.
- Say or do anything to blame or shame any young people involved.

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

### **Initial review meeting**

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

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) to safeguard the young person (in most cases, images or videos should not be viewed).
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- 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 SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

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

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

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

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

### **Informing parents/carers**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through a police community support officer, local neighbourhood police or dialling 101.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **Curriculum coverage**

[School specific details: amend the following as required]

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSE programme and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

## **7.10. Reporting systems for our pupils**

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

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

To achieve this, we will:

- Establish and maintain an ethos where all children (including those having protected characteristics under the Equalities Act 2010) feel secure and are encouraged to report concerns, talk, and are listened to.
- Make reasonable adjustments for disabled children and young people.
- Ensure that children know that there are adults in the school whom they can approach if they are worried or are in difficulty and that there are alternative ways to report concerns.
- 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.

[School specific details:

- Who pupils report concerns to and how they do this
- How pupils know how to report concerns, eg discussion in relationships/sex education curriculum
- What support there is following a disclosure]

## **7.11.Support for pupils and school staff**

Our school recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view their lives in a positive way and that this is likely to adversely impact their mental health and emotional well-being. Children may be vulnerable because, for instance, they have needed an allocated social worker, have a disability, are in care, a care-leaver or previously looked after, or are experiencing some form of neglect. It is therefore important that staff recognise that mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. For such children school may be one of the few stable, secure, and predictable components of their lives.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, by following this policy and speaking to the DSL or DDSL.

Our school seeks to remove any barriers that may exist in being able to recognise abuse or neglect in pupils with special educational needs, disabilities or physical health issues. These barriers include:

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

- Cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

We will seek to provide such children with the necessary support to build their self-esteem and confidence, helping them to secure the very best educational outcomes they are able to achieve.

The context in which safeguarding incidents and/or behaviours occur, whether in school or within or outside the home (including online), will be considered by staff, particularly the DSL and DDSL(s). Any associated threats or risks will be included in assessments and relevant information included in referrals to children's social care.

General indicators of abuse and neglect (from Part 1 of the statutory guidance, KCSIE) are also included in Appendix 8 of this policy and further information about specific forms of abuse are contained within Appendix B of the statutory guidance, KCSIE.

## 8. Online safety and the use of mobile technology

This section summarises our approach to online safety and mobile phone use. For full details, please refer to our online safety policy and mobile phone policy which can be found on our website.

[School specific details: early years providers must cover the use of mobile phones and cameras in their setting by adding more specific detail to the following:]

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community (see mobile phone policy).
- 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, antisemitism, 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 (eg, consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The key points for staff and volunteers (not including the DSL) being:

- Report immediately to the DSL.
- Do not view, copy, print, share, store or save the imagery, or ask a child to share or download.
- If you have already viewed the imagery by accident (eg, if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it. Leave this for the DSL if needed.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves, their parents/carers or other parents/carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

**To meet our aims and address the risks above, we will:** [School specific details: adapt as required]

- 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, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use but 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 school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk (described above) from the school's IT systems. [School specific details: 'See Online Safety Policy' OR describe filtering and monitoring procedures in detail if no separate Online Safety Policy is in place by amending the following:

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly].

**Early years providers** [School specific details: delete if not applicable or amend section as required]

To ensure the safety and welfare of the children in our care the protocol for the use of personal mobile phones and cameras in the school is as follows:

- All staff (including visitors, volunteers and students) must ensure that their mobile phones, personal cameras and recording devices are stored securely during working hours on school premises or when on outings.
- Mobile phones must not be used in any teaching area in school or within toilet or changing areas.
- Only school equipment should be used to record classroom activities. Photos should be put on the school system as soon as possible and not sent to or kept on personal devices.
- During school outings, nominated staff will have access to a school mobile which can be used for emergencies or contact purposes.
- All telephone contact with parents/carers must be made on the school phone and a note kept.
- Parents/carers are/are not permitted to take photographs of their own children during a school production or event. The school protocol requires that photos of other people's children are not published on social networking sites such as Facebook.

## 8.1. Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

We recognise that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (eg, bullying and grooming) and/or expose pupils to harmful content, eg, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully pupils in line with this policy [school specific details: include if applicable: 'and our anti-bullying policy and behaviour policy].

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

## 9. Notifying parents or carers

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents/carers of all the children involved. We will think carefully about what information we provide about the other

child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL, along with any relevant agencies and decided on a case-by-case basis, will:

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

## **10. Pupils with special educational needs and disabilities (SEND) or health issues**

We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges, and are three times more likely to be abused than their peers. 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 SEND or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

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

[School specific details: add details of the pastoral care offered to these pupils and the support provided to help pupils overcome any communication barriers they face].

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

## **11. 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.

## **12. 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's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads.
- 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 at our school is [insert name]. They are appropriately trained and have 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.

## 13. Complaints and concerns about school safeguarding policies

### Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Embrace Multi Academy Trust Allegations Policy).

### Other complaints

Safeguarding-related complaints of other types will be handled in line with the Embrace Multi Academy Trust [Complaints policy](#).

[School specific details: Early years providers should take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.75)].

### Whistleblowing

If members of staff have any concerns regarding the way the school safeguards pupils, including poor or unsafe practice, or potential failures, particularly where they have previously raised concerns with their DSL, they may raise these via the Embrace Multi Academy Trust [whistleblowing policy](#).

## 14. Record-keeping

We will hold records in line with our records retention schedule.

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

Records will include:

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

Any concerns about a child will be recorded in writing within 24 hours. All records will provide a factual and evidence-based account and there will be accurate recording of any actions. Records will be signed,

dated and, where appropriate, witnessed. Where an opinion or professional judgement is recorded this should be clearly stated as such.

At no time should an individual member of staff or school take photographic evidence of any injuries or marks to a child's person; this type of behaviour could lead to the staff member being taken into managing allegations procedures. The body maps should be used in accordance with recording guidance and to support clarity, for example of areas of injury, marks and bruising and or touching.

Any concerns should be reported and recorded without delay to the DSL and the appropriate safeguarding service, e.g. First Response or the child's social worker if already an open case to social care.

Concerns and referrals will be logged on CPOMs. Any recorded on paper will be scanned and saved in the document vault on CPOMs for individual children.

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

Safeguarding records relating to individual children should be passed on to any new school the child attends and kept until they are 25 (this is seven years after they reach the school leaving age).

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be:

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

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

[School specific details: add further information about safeguarding record-keeping arrangements, eg

- Paper based or electronic record Are records paper-based or electronic?
- Where records are held
- How records are kept secure
- How long the information will be retained
- How confidentiality of records is ensured when appropriate
- How information is shared by schools with agencies.

Our school will ensure all our files will be available for external scrutiny, for example by a regulatory agency or because of a rapid review or audit.

In addition, Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.

## 15. Training

### 15.1.All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the three safeguarding partners.
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- 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, if applicable.

## **15.2. The DSL and DDSL(s)**

The DSL and DDSL(s) will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent duty awareness training.

## **15.3. Governors**

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

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

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

## **15.4. Recruitment – interview panels**

The following practice is a requirement for maintained schools and pupil referral units but is considered good practice for all schools.

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training, the substance of which should, at a minimum, cover the content of Part three of Keeping Children Safe in Education and will be in line with local safeguarding procedures. Safer recruitment training is to be undertaken through either; The Key, The NSPCC or

<https://www.countysafeguarding.co.uk/>

See appendix 2 of this policy for more information about our safer recruitment procedures.

### **15.5. Staff who have contact with pupils and families**

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

## **16. Links with other policies**

This policy links to the following policies and procedures: [School specific details: amend the following as required]

- Acceptable use of IT
- Anti-bullying
- Attendance
- Behaviour
- Complaints
- Curriculum
- Guidance for Designated teacher for looked-after and previously looked-after children
- Equality
- First aid
- Health and safety
- Mobile phone use
- Online safety
- Privacy notices
- Relationships and sex education
- Staff code of conduct
- Whistleblowing

## Appendix 1: Types of Abuse

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

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

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

Emotional abuse may involve:

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

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether 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.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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 caregivers).
- Ensure access to appropriate medical care or treatment.

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

## **Appendix 2: Safer Recruitment and DBS checks – Policy and Procedures**

# **Safer Recruitment Policy**

This policy applies to all schools within Embrace Multi Academy Trust. The trust is committed to attracting, selecting and retaining employees, both permanent and temporary, who will make a positive contribution to the trust.

The purpose of the Safer Recruitment Policy is to ensure that safe, equitable and transparent recruitment and selection processes are observed at all times, and that we appoint the best person for the job. These safer recruitment and selection procedures comply with current education and employment legislation and ACAS guidance, including guidance on ensuring the safety and welfare of children and young people.

Those responsible for each stage of the recruitment process will be expected to demonstrate at all times a professional approach by dealing honestly, efficiently and fairly with all candidates. The trust has a statutory duty to maintain the safety and welfare of children and young people and will implement safeguarding procedures and arrangements throughout the recruitment process.

Advice on recruitment should always be sought from the trust HR team.

### **1. Recruitment and selection process**

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2023 alongside the trust's recruitment checklist document.

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

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

#### **1.1. Advertising**

When advertising roles, we will make clear:

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

#### **1.2. Application forms**

Our application forms will:

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

### **1.3. Shortlisting**

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

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

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

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

We will also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we will carry out these checks as part of our due diligence process.

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

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

When seeking references, we will:

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

### **1.5. Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently and ask candidates to explain this.

- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Record all information considered and decisions made.

## 2. Pre-appointment vetting checks

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

### 2.1. New staff

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

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not normally keep a copy of the certificate but should there be a valid reason for doing so, it should not be kept for longer than six months. When the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#).
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.
- Check that any candidates taking up a management position<sup>1</sup> are not subject to a prohibition from management (section 128) direction made by the secretary of state.
- [School specific details: include for schools with pupils aged under 8]: Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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<sup>1</sup> Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

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

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

## 2.2. Existing staff

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

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

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

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

## 2.3. Agency and third-party staff

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

## 2.4. Contractors

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

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

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

We will not normally keep a copy of the certificate, but should there be a valid reason for doing so, it should not be kept for longer than six months.

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

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

[School specific details: include for schools with pupils aged under 8] For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## **2.5. Trainee/student teachers**

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

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

[School specific details: include for schools with pupils aged under 8] In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **2.6. Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- [School specific details: include for schools with pupils aged under 8] Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## **2.7. Governors, Trustees and Members**

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

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

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

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK

- Other checks deemed necessary if they have lived or worked outside the UK

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

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

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

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

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

## **2.10. Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## Appendix 3: Specific Safeguarding Issues

### 1. Children who are absent from education

A child being absent 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 be absent or become missing from education, but some children are particularly at risk. These include children who:

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

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

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, 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.

### 2. Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.

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

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

### **3. Child sexual exploitation**

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

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

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

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

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

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

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

### **4. Child-on-child abuse (refer to part 5 of KCSIE)**

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

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse').

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

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

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

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

## 5. Domestic abuse

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

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

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

[School specific details: Secondary schools add]: Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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

If the police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform a key adult in school (usually the DSL) before the child or

children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass. [School specific details: check local procedures and adapt if necessary].

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

## 6. Homelessness

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

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

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

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

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

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

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

## 8. Female Genital Mutilation FGM

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

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

Indicators **that FGM has already occurred include:**

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

- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs.

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

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

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

## 9. Forced marriage

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

Since February 2023, it is also illegal to cause a child under the age of 18 to marry, even if violence, threats, or coercion are not involved.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

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

## 10. Preventing radicalisation

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

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

**Terrorism** is an action that:

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

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities that 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 the safeguarding and child protection policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including:

- [School specific details: list relevant policies]

## 11. Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- Regularly review decisions and actions, and update policies with lessons learnt.
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.

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

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

## 12. Serious violence

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

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

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

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

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

## 13. Checking the identity and suitability of visitors

[School specific details: adapt this section to reflect own procedures]:

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

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

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

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

## **14. Non-collection of children**

If a child is not collected at the end of the session/day, we will:

- [School specific details: add procedures or refer to separate policy if applicable. Include information on contacting parents/carers; who will look after the child and how the incident will be recorded]

## **15. Missing pupils**

Our school recognises the entitlement that all children have to education and will work closely with the local authority inclusion service to share information about pupils who may be missing out on full time education or who go missing.

We also recognise that children who are absent from school, particularly on repeat occasions or for prolonged periods are likely to be at a greater risk of abuse and neglect.

The school attendance policy sets out the actions that will be taken to check the wellbeing of any pupil that is absent.

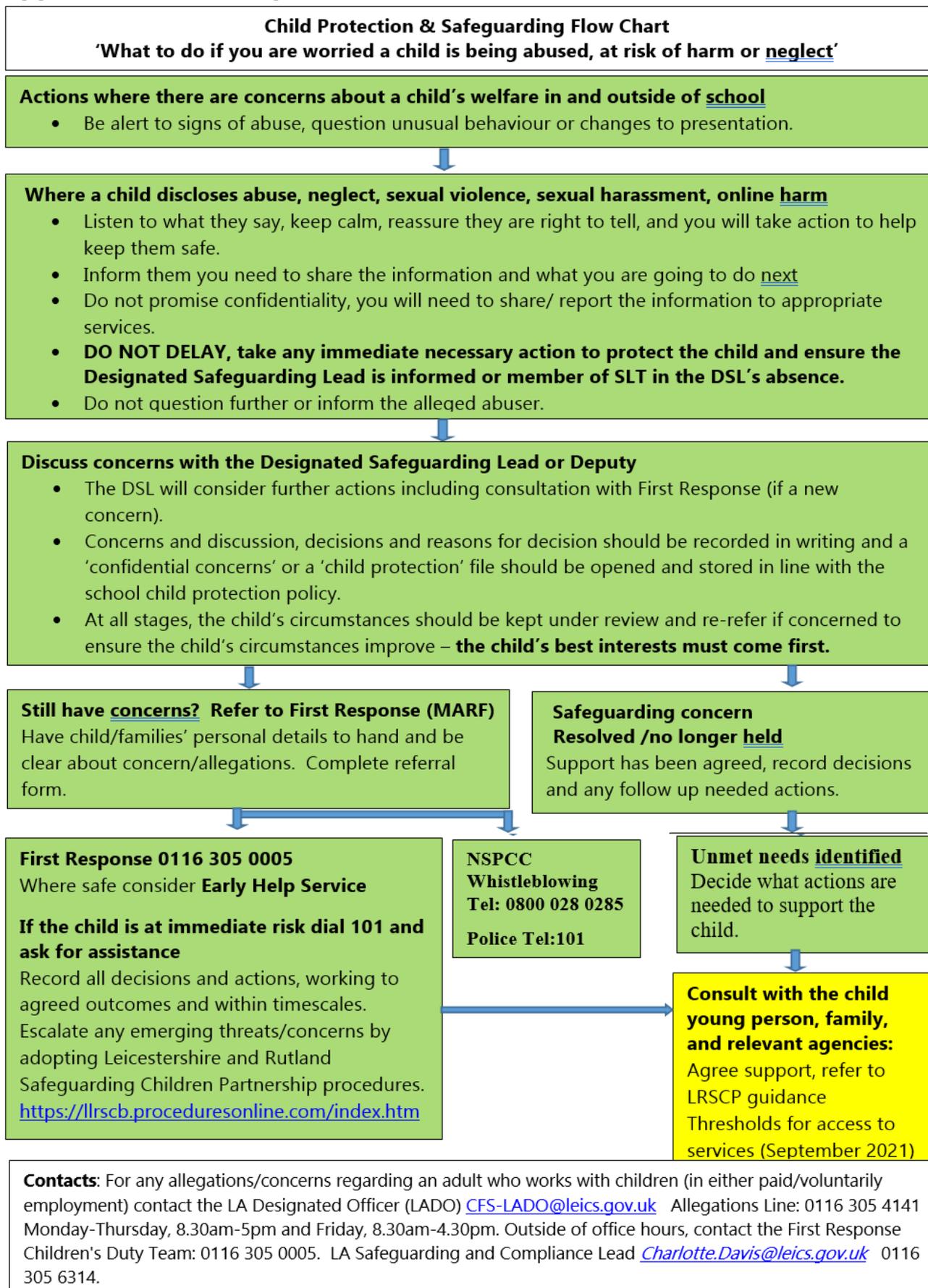
The local authority will also be informed where children are to be removed from the school register a) to be educated outside the school system (and where an Education Health Care Plan is in place, this needs to be reviewed); b) for medical reasons; c) because they have ceased to attend; d) because they are in custody; d) because they have been permanently excluded.

We also recognise that when children go missing or absent from school repeatedly or for prolonged periods, this is a sign that they may have been targeted by perpetrators of child sexual exploitation and/or drug related criminals (county lines). Children may also be groomed into participating in other forms of criminal exploitation including cybercrime, serious violence and violent crime. Children who attend an alternative education provision or have an agreed reduced timetable are more likely to be vulnerable to these forms of exploitation.

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- [School specific details: add procedures or refer to separate policy if applicable. Include information on contacting parents/carers; who will look after the child and how the incident will be recorded]

## Appendix 4: Referral process



## Appendix 5: Radicalisation

**SCHOOL NAME:** [School specific details to be added]

	Yes/No	Evidence
Does the school have a policy?		
Does the school work with outside agencies on radicalisation and extremism, eg Channel?		
Have staff received appropriate training?		
Has the school got a trained Prevent lead?		
Do staff know who to discuss concerns with? (DSL)		
Is suitable filtering of the internet in place?		
Do children know who to talk to about their concerns?		
Are there opportunities for children to learn about radicalisation and extremism?		
Have any cases been reported?		
Are individual pupils risk assessed?		
What factors make the school community potentially vulnerable to being radicalised? (eg, EDL local base, extreme religious views promoted locally, tensions between local communities, promotion of radical websites by some pupils/parents)		
Comment on the school's community, locality and relevant history		
Risk evaluation	<b>Evaluate as one of:</b> Low Medium High	Way Forward