Safeguarding Policy

CONTENTS

		Page No.
1.	Introduction	6
2.	Legislation and statutory guidance	6
3.	The Appollo's School Trust Commitment	7
4.	Links with other policies and procedures	8
5.	Definitions	8
6.	Roles and responsibilities	10
	6.1 Trustees	10
	6.2 School Governors	11
	6.3 Head of School/Headteacher	11
	6.4 Designated Safeguarding Lead (DSL)	11
	6.4.1 Manage referrals	11
	6.4.2 Working with others	11
	6.4.3 Raising awareness	12
	6.4.4 Training, knowledge, and skills	12
	6.4.5 Providing support to staff	13
	6.4.6 Understanding the views of children	14
	6.4.7 Holding and sharing information	14
7.	Providing a safe and supportive environment	14
	7.1 Safe practice	14
	7.2 Safer recruitment and selection	14
	7.3 Staff training	15
	7.4 Opportunities to teach safeguarding	15
8.	Confidentiality and information sharing	16
9.	Working together	17
	9.1 Students	17
	9.2 Parents/carers	17
	9.3 Multi agency working	17
10.	Identifying children and young people who may be suffering significant harm	18
	10.1 Child Criminal Exploitation (CCE)	20
	10.2 Child Sexual Exploitation (CSE)	20
	10.3 County Lines	21
	10.4 Modern slavery and the national referral mechanism (NRM)	22
	10.5 Cybercrime	22
	10.6 Domestic abuse	22
	10.6.1 Operation Encompass	23
	10.6.2 National Domestic Abuse Helpline	23
	10.7 Homelessness	24
	10.8 So-called 'honour-based' abuse including Female Genital Mutilation (FGM) and forced marriage	24
	10.8.1 Actions	25
	10.9 Female Genital Mutilation (FGM)	25
	10.9.1 FGM mandatory reporting duty for teachers	25
	10.10 Forced marriage	26
	10.11 Child on child abuse	26
	10.12 Sexual violence and sexual harassment between children in schools and colleges	
	10.12.1 What is sexual violence and sexual harassment?	27
	10.12.2 What is consent?	
	10.13 Sexual harassment	28
	10.14 Serious violence	29
	10.15 Preventing radicalisation	29
	10.15.1 The Prevent Duty	30
	10.15.2 Channel	31
	10.16 Private fostering	31
	10.17 Child abduction and community safety incidents	32
	10.18 Children and the court system	32
	10.19 Children who are absent from education	33
	10.20 Children missing in education	33

10.21 Children with family members in prison 33
10.22 Children at potential greater risk of harm 34
10.23 Children requiring mental health support 34
10.24 Children in care and children previously in care 34
34
35
11. Other relevant information 35
11.1 Online safety 36
11.2 Procedures for transporting students in an emergency 37
11.3 Extended Academy and off-site arrangements 37
11.4 Photography and images 37
11.5 Behaviour 38
11.6 Racist incidents 38
11.7 Health and safety 38
11.8 Work experience 38
11.9 Children staying with host families 38
11.10 Elective home education (EHE) 38
11.11 Early help 39
11.12 Statutory assessments 39
11.13 Children suffering or likely to suffer significant harm 39
12. Taking action to ensure that children are safe in the Academy 39
12.1 Staff will immediately report 39
12.2 Responding to a disclosure 40
12.2.1 Principles 40
12.2.2 Staff 40
12.3 Action by the Designated Safeguarding Lead 41
12.4 Action following a child protection referral 41
12.5 Recording and monitoring 42
12.6 Contextual safeguarding 43
12.7 Supporting the child and partnership with parents/carers 43
12.8 Children in care and previously children previously in care 43
12.9 Children with SEND 44
12.10 Children who are lesbian, gay, bi or trans (LGBTQ+) 44

13. Allegations regarding persons working in or behalf of the Trust (including supply staff and volunteers) who may pose a risk of harm to children. 44
13.1 Initial Action 45
14. Organisations or individuals using school premises 46

REVISION HISTORY

Issue No	Date	Description
1	September 2022	Updated in line with KCSIE 2022 including links to websites. Changed peer-on-peer abuse to child-on-child abuse. Included training for Trustees and Governors. Included requirement for appropriate adult. Clarified timescales for the transferring of CP files. Updated extra familial harms, domestic abuse, child on child abuse, sexual violence, and sexual harassment. Updated Online safety to include informing parents of the apps and websites their child may access. Included a DSL Checklist at Appendix 4. Updated sections on children with SEND & Children who are LGBTQ+ Updated DSL and Deputy DSLs.
2	September 2023	Updated in line with KCSIE 2023 including links to websites. Updated roles and responsibilities and staff training to include reference to filtering and monitoring. Updated sections on Forced Marriage, Channel, Children who are Absent from Education, Children Requiring Mental Health Support, Online Safety, Organisations or Individuals using School Premises. Updated DSL and Deputy DSLs.
3	September 2024	Updated in line with KCSIE 2024. Updated Section 6.4.7. Updated Roles and Responsibilities for Trustees. Updated references to GDPR to include UK. Updated Section 10 in accordance with Working Together to Safeguard Children 2023. Updated Section 10.15 in accordance with the updated PREVENT guidance. Updated links in Section 10.18. Updated Section 12.10 to include reference to 'questioning their gender'. Included links to statutory guidance for alternative provision, children with health needs who cannot attend school and NSPCC guidance on safeguarding children with SEND. Looked after children changed to children in care
4	September 2025	Updated in line with KCSIE 2025 Updated in line with RSE & Health Education guidance Updates with regards to 'Opportunities to teach Safeguarding' Updated

1. Introduction

This policy is in response to:

- Sections 157 and 175 of the Education Act 2002, implemented June 2004
- 'Keeping Children Safe in Education' issued by the DfE in 2025

It is in line with the relevant Safeguarding Partnership's Child Protection Procedures and DfE guidance.

This policy applies to all adults, including supply staff and volunteers, working in or on behalf of the Academy or the Trust.

Everyone in the education service shares an objective to help keep children and young people safe by contributing to:

- Providing a safe environment for children and young people to learn in education settings.
- Identifying children and young people who are suffering or likely to suffer significant harm and taking appropriate action with the aim of making sure they are kept safe both at home and in the education setting.
- Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who encounters children and their families and carers has a role to play in safeguarding children.
- Staff have the 'opportunity to 'Teach safeguarding', empowering young people and their families to identify areas in need and how to access appropriate support.

To fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, always, what is in the **best interests** of the child.

2. Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance, Keeping children safe in education 2025 (publishing.service.gov.uk) , Working together to safeguard children - GOV.UK (www.gov.uk), Governance Handbook and complies with our funding agreement and articles of association.

Endeavour Academy is aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements.

We comply with the guidance and the procedures published by the relevant local safeguarding partners (Appendix 1).

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 (FGM) 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 FGM appears to have been carried out on a girl under 18.

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

3. The Appollo's School Trust Commitment

The Trust and its Academies will facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies will operate with the best interest of the child at their heart.

The Trust is committed to safeguarding and promoting the welfare of all its students and that the welfare of each student is of paramount importance.

We recognise that:

- Some children may be especially vulnerable to abuse or exploitation e.g., those with Special Educational Needs, those living in adverse circumstances.
- Children who are abused, neglected or exploited may find it difficult to develop a sense of self-worth and to view the world in a positive way.
- The behaviour of children who are abused, neglected or exploited may be challenging.
- Some children who have experienced abuse may harm others.

We will always take a considered and sensitive approach in order that we can support all our students.

Where there is a safeguarding concern, the Trust and its Academy Leaders will ensure that the child's wishes, and feelings are considered when determining what action to take and what services to provide. Systems will be in place, and will be well promoted, easily understood and easily accessible for children to confidently report abuse, neglect or exploitation, knowing they can safely express their views and give feedback.

There will be a named Designated Safeguarding Lead and Deputy Designated Safeguarding Lead in each Academy and the Trustees and School Governors will appoint a named Safeguarding Governor. (Appendix 2).

4. Links with other policies and procedures

This policy should be read alongside the following policies and procedures:

- Acceptable User (Shared and signed on admission)
- Anti-Bullying
- Attendance

- Behaviour (Promoting Positive Behaviour)
- Public Interest Disclosure Policy (Whistleblowing Policy)
- General Data Protection Regulations (GDPR)
- Educational Visits
- Exclusion policy
- Home School Agreement (including Acceptable User Policy)
- Health and Safety at Work Act (HASAWA)
- Staff Appointments Policy
- SEND policy
- Staff Code of Practice and Professional Standards
- Supporting Students with Medical Conditions

All policies are available on the Academy website.

www.endeavouracademy.co.uk

5. Definitions

- **Safeguarding children:** The actions we take to promote the welfare of children and protect them from harm are everyone's responsibility. Everyone who encounters children and families has a role to play.

- **Safeguarding and promoting the welfare of children is defined as:**
  - Protecting children from maltreatment.
  - Preventing impairment of children's mental health and physical health or development.
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - Taking action to ensure all children have the best outcomes.

- **Child:** As in the Children's Acts 1989 and 2004, a child is defined as anyone who has not yet reached his/her 18th birthday.
- **Child in Need:** a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.
- **Harm:** Ill treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another.
- **Development:** Physical, intellectual, emotional, social, or behavioural development.
- **Health:** Includes physical and mental health.
- **Ill-treatment:** Includes sexual abuse and other forms of ill-treatment which are not physical.
- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

- **Physical abuse:** a form of abuse which 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/carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional Abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects in the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's development capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. it may involve serious bullying (including cyber bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (Section 10.11).
- **Neglect:** 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, for example, because of maternal substance abuse. Once the child is born, neglect may involve a parent/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 adequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

6. Roles and Responsibilities

6.1 Trustees

The Trustees will ensure:

- The Trust has a Child Safeguarding policy and procedures in place that are in accordance with the Local Safeguarding Partner guidance and locally agreed interagency procedures, and the policy is available to parents/carers upon request.
- The Trust operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children.
- All members, trustees and Governors are subject a Section 128 check.
- The Trust has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the Local Authority and locally agreed inter-agency procedures.
- A senior member of the Academy's Leadership Team is appointed to the role of designated safeguarding lead. The designated safeguarding lead will take lead responsibility for safeguarding and Child Protection (and a deputy) including online safety and

understanding the filtering and monitoring systems and processes in place.

- Staff receive appropriate safeguarding and child protection training (including online safety) and understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Trustees and Governors receive appropriate safeguarding and child protection (including online) training at induction and is regularly updated. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.
- They remedy, without delay, any deficiencies, or weaknesses regarding child protection arrangements.
- Where services or activities are provided on an Academy's premises by another body, the body concerned has appropriate policies and procedures in place regarding safeguarding children and child protection and liaises with the Academy on these matters where appropriate.
- Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of the pupil and be satisfied that the placement meets the pupil's needs.
- Ensure they are aware of the additional risk of harm that pupils in alternative provision may be vulnerable to and have regard for the relevant DFE statutory guidance. That appropriate safeguarding checks have been carried out on anyone working at the AP about any changes that might put the child at risk, for example staff changes, so the school can make sure appropriate safeguarding checks have been carried out
- The Safeguarding Policy is updated and reviewed annually.
- They review their policies and procedures annually and provide information to the LA about them and about how the above duties have been discharged.
- Appropriate online filtering and monitoring is in place and is kept up to date, whilst not preventing access to online learning opportunities.
- Use information provided by the DfE on Generative AI: product safety expectations - GOV.UK
- Teach how to use generative AI safely
- Teach how filtering and monitoring requirements apply to the use of generative AI in education.
- Should an allegation arise outside of the Academy's term time and the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead and Head of School/Headteacher are unavailable, the Trust has a process in place with a named person responsible for managing the referral process in their absence.

6.2 School Governors

The School Governors will:

- Appoint a Link Governor for Safeguarding who will meet with the DSL at least once a term to monitor the effectiveness of this policy.

6.3 Head of School/Headteacher

The Head of School/Headteacher will ensure that:

- The policies and procedures adopted by the Trust are fully implemented and followed by all staff.
- Sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities; and
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regarding to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with the Trust's Whistleblowing Policy.
- Where appropriate, cases are referred to the Director of HR where a person is dismissed

or left due to risk/harm to a child to ensure referrals are made to the appropriate bodies as required.

6.4 Designated Safeguarding Lead

6.4.1 Manage referrals

The DSL is expected to:

- Refer cases of suspected or alleged abuse to the relevant investigating agencies.
- Act as a source of support, advice, and expertise within the educational establishment.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Support staff who make referrals to the Channel programme.
- Liaise with the Head of School/Headteacher to inform him/her of any issues and ongoing investigations and ensure there is always cover for this role.
- Where appropriate, refer cases to the Head of School/Headteacher where a person is dismissed or left due to risk/harm to a child to ensure referrals are made to the appropriate bodies as required.

6.4.2 Working with others

The DSL is expected to:

- act as a source of support, advice, and expertise for all staff.
- act as a point of contact with the safeguarding partners.
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
  This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.
- take the lead on understanding the filtering and monitoring systems and processes in place in the Academy.
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs co-ordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:

    - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
    - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended,

there is still a lasting impact on children's educational outcomes.

6.4.3 Raising awareness

The DSL will:

- ensure each member of staff has access to, and understands, the Trust's child protection policy and procedures, especially new and part-time staff.
- ensure the Academy's procedures and implementation are updated and reviewed regularly, and work with the Trust regarding this.
- ensure the child protection policy is available publicly and parents/carers know referrals about suspected abuse, neglect or exploitation may be made and the role of the Academy in this.
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and Academy leaders.

6.4.4 Training, knowledge, and skills

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training. Training will provide designated safeguarding leads with a good understanding of their role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures, and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care to safeguard and promote the welfare of children.
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations, and practitioners.
- understand and support the school or college with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation.
- can understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college.
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online.
- obtain access to resources and attend any relevant or refresher training courses; and,

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

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

6.4.5 Providing support to staff

Training will support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

6.4.6 Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads will be supported to develop knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the Academy may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

6.4.7 Holding and sharing information

The critical importance of recording, holding, using, and sharing information effectively is set out in Parts one, two and five of KCSIE 2025, and therefore the designated safeguarding lead will be equipped to:

- Understand the importance of information sharing, both within the Academy, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations, and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- Be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the PREVENT program.

7. Providing a safe and supportive environment

7.1 Safe practice

Safe working practice ensures that students are safe and that all staff:

- Are responsible for their own action and behaviours and know how to avoid any conduct which could lead any reasonable person to question their motivation or intentions.
- Work in an open and transparent way.
- Discuss and/or take advice from the Academy management over any incident which may give rise to concern.
- Record any incidents or decisions made in relation to a child or young person.
- Apply the same professional standards regardless of gender or sexuality.

- Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

7.2 Safer recruitment and selection

The Trust pays full regard to DfE guidance 'Keeping Children Safe in Education 2025'. We ensure that all appropriate measures are applied in relation to everyone who works in a Trust Academy who is likely to be perceived by the students as a safe and trustworthy adult, including volunteers and staff employed by contractors. Safer recruitment practice has been fully encompassed in the Trust's Recruitment and Selection Policy and Procedure. Safer recruitment practice includes scrutinising applications, verifying identity and qualifications, obtaining professional and character references, checking previous teacher records, employment history, carrying out an online search as part of diligence on shortlisted candidates, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking rigorous selection procedures and Disclosure and Barring Service (DBS) and other checks including the rehabilitation of ex-offenders.

Recruitment practices in place are:

- An Enhanced DBS with Barred list check is obtained for all new appointments to the Trust workforce (all Members, Trustees and Governors are also required to undertake an Enhanced DBS check).
- Teacher Prohibition checks are undertaken for all teachers employed by the Trust.
- ID and right to work in the UK is verified prior to appointment.
- Two references are taken for all appointments.
- An Enhanced DBS is obtained for volunteers following a risk assessment considering the frequency, regularity, duration, and nature of contact with children and young people.
- The Trust ensures that any contracted staff are DBS checked where appropriate.
- Each Academy maintains a Single Central Record detailing the range of checks carried out on their staff, volunteers, governors, regular visitors, and contractors.
- All new appointments to the Trust workforce are subject to identity, criminal conviction disclosure, health, and rights to work in the UK checks prior to appointment.
- The Trust satisfies itself that the same level of stringent checks has been undertaken on any supply staff.
- At least one member of every interview or appointment panel will have completed Safer Recruitment training.

7.3 Staff training

All staff employed by the Trust will undertake Safeguarding and Child Protection Training (which will include online safety as well as an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) as part of the induction process.

The Academy's Designated Safeguarding Lead and Deputy Designated Safeguarding Lead with Responsibility for Child Protection undertake basic child protection and safeguarding training on a 2-yearly basis.

All staff (including temporary staff and volunteers) are provided with a copy of this and other relevant policies during Induction.

Members, Trustees and Governors will complete Safeguarding and Child Protection training which will include online safety and understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of the development programme. In addition, the Trust's Staff Code of Conduct outlines acceptable and unacceptable behaviour towards children and young people.

In addition, staff will be supported by the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead with Responsibility for Child Protection, who will provide guidance and training where appropriate.

7.4 Opportunities to teach safeguarding

The Academy provides a broad and balanced curriculum and will ensure that children are taught about safeguarding, including online safety content (misinformation, disinformation / fake news, and conspiracy theories.

This will also include covering relevant issues through Relationships Sex Education and Health Education. The Government regulations which make the subjects of Relationships Education and Relationships and Sex Education and Health Education are mandatory and have been from September 2020.

The DfE has produced a one-stop page for teachers on Gov.UK, which can be accessed here https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health.

Over the course of 2025/26, leaders are working to implement the 2026 RHSE policy as directed by the government. Relationships Education, Relationships and Sex Education and Health Education guidance

8. Confidentiality and information sharing

The Trust acknowledge that information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation.

The Trust is aware of the duties the Data Protection Act 2018 and the UKGDPR place on the organisation and individuals to process personal information fairly and lawfully and to keep the information safe and secure.

The Trust will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information as provided for in the Data Protection Act 2018 and the UKGDPR. This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is a good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, if it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with the schools' obligations under the Data Protection Act 2018 and the UKGDPR. The exemption only applies to the extent that complying with the right of access would be likely to cause *serious harm* to the *physical* or *mental health* of any individual. This is known as the 'serious harm test' for education data. Where the Trust is in doubt, independent legal advice will be sought.

The Data Protection Act 2018 and UKGDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding and Data Manager. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

When a child leaves an Academy within the Trust the Designated Safeguarding lead will ensure that the child protection file is transferred to the new school or college as soon as possible, and **within 5 days** for an in-year transfer or within the **first 5 days** of the start of a new term to allow

the new school or college to have support in place when the child arrives. The DSL will ensure secure transit and confirmation of receipt will be obtained. For schools this will be transferred separately to the main pupil file. On receipt of such information, we will ensure that key staff including the DSL and special educational needs co-ordinator (SENCO) are made aware as required.

To keep children safe and provide appropriate care for them each Academy will maintain accurate and up to date information regarding:

- Names (including any previous names), address and date of birth of child.
- Names and contact details of persons with whom the child normally lives.
- Names and contact details of all persons with parental responsibility (if different from above).
- Whether the child is looked after.
- Emergency contact details (3, wherever possible).
- Details of any persons authorised to collect the child from the Academy.
- Any relevant court orders in place including those which affect any person's access to the child (e.g., Residence Order, Contact Order, Interim or Full Care Order, Injunctions etc).
- If the child is or has a Child Protection Plan (formerly known as being on the Child Protection Register).
- Name and contact details of any key persons from other agencies, including GP.
- Any other factors which may impact on the safety and welfare of the child.

9. Working Together

9.1 Students

The Trust is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. Staff recognise that not all abuse and safeguarding issues are reported, however we will ensure that all students are secure, should they need to report such matters. All students will be informed that there is a senior member of staff with responsibility for child protection and they will know who this is. We will inform students of whom they might talk to, both in and out of the Academy, their right to be listened to and heard and what steps can be taken to protect them from harm. Information is made available to students, including NSPCC and Childline.

The Trust's arrangements for consulting with and listening to students are via Student Voice. We make students aware of these arrangements via assemblies, posters, lessons.

9.2 Parents/Carers

The Trust shares a purpose with parents/carers to keep children safe from harm and to have their welfare promoted.

The Trust follow the appropriate Local Safeguarding Partner procedures when dealing with any matters of a child protection nature. The Academy will endeavour to discuss all concerns with parents/carers about their child/ren. However, there may be exceptional circumstances when an Academy will discuss concerns with Social Care and/or the Police without parental knowledge (in accordance with Safeguarding Partner Child Protection Procedures). The Academy will, of course, always aim to maintain a positive relationship with all parents/carers. The Trust's Child Safeguarding Policy is available to all parents/carers upon request.

9.3 Multi agency working

The Trust recognises the pivotal role it must play in multi-agency safeguarding arrangements and will contribute to multi agency work in line with the statutory guidance Working together to safeguard children.

The Trust will follow the local arrangements in place for safeguarding partners and child death review partner arrangements. Locally, the safeguarding partners (the LA; a clinical

commissioning group for an area within the LA; and the chief officer of police for a police area in the LA) will decide to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

The Trust will also work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This will include providing a co-ordinated offer of early help when additional needs of children are identified; and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

10. Identifying children and young people who may be suffering significant harm

Teachers and other adults in each Academy are well placed to observe any physical, emotional, or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, students, parents, and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or Trust staff being alerted to concerns.

Safeguarding is not just about protecting children from deliberate harm. It also relates to aspects oof school life including:

- Pupils' health and safety.
- The use of reasonable force.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Educational visits.
- Intimate care.
- Internet or e-safety.
- Appropriate arrangements to ensure school security, considering the local context.

Safeguarding can involve a range of potential issues such as:

- Bullying, including cyber bullying (by text message, on social networking sites, etc) and prejudice-based bullying.
- Racist homophobic or transphobic abuse.
- Extremist behaviour i.e., radicalisation.
- Child sexual exploitation/child criminal exploitation.
- Sexual violence and sexual harassment between children.
- Sexting.
- Substance misuse.
- Issues which may be specific to a local area or population, for example gang activity and youth violence.
- Issues affecting children including domestic violence, female genital mutilations, honour-based violence and forced marriage.

Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. All staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may need of help or protection. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or deputy).

All school staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with another.

Staff should also be aware that any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether they have a statutory education, health, and care plan).
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Has a parent or carer in custody or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol abuse, adult mental health problems and domestic abuse.
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of school and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationships abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

All staff will have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes' images and/or videos can be signs that children are at risk. Other safeguarding issues all staff will have an awareness of include:

10.1 Child Criminal Exploitation (CCE)

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, and they are not

treated as victims despite the harm they have experienced. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or threaten other young people. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home; and
- Children who regularly miss school or education or do not take part in
- education.

10.2 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse and occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim wants or needs, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

Sexual abuse may involve physical contact, including assault by penetration (for example rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual things or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

The indicators for CCE can also be indicators for CSE, as can:

- Children who have older boyfriends or girlfriends; and
- Children who suffer from sexually transmitted infections or become pregnant.

10.3 County Lines

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

compliance of victims.

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

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

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

- go missing and are subsequently found in areas away from their home.
- have been the victim or perpetrator of serious violence (e.g., knife crime).
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity.
- owe a 'debt bond' to their exploiters.
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf.

10.4 Modern Slavery and the National Referral Mechanism (NRM)
Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

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

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

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

offence, including those above.

Children with skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the http://www.cyberchoices.uk/ programme.

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

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

10.6 Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

10.6.1 Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools

work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website https://www.operationencompass.org/

10.6.2 National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk)
(Includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse).
https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/
What about my children? - Refuge Charity - Domestic Violence Help
Spotlight #3: Young people and domestic abuse | Safelives
https://www.operationencompass.org/

10.7 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to child's welfare. The DSL (and any Deputies) should be aware of contact details and referrals routes into the Local Housing Authority (LHA) so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent areas, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the LHA should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The following factsheets usefully summarise the new duties:

https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets.

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible before they are facing a homelessness crisis.

The Trust does consider homelessness in the context of children who live with their families, and intervention will be on that basis, we also recognise in some cases 16 year olds could be living independently from their parents / carers, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing,

Communities and Local Government have published joint statutory guidance on the provision of accommodation for those 16 year olds those who may be homeless and/or require accommodation.

https://www.gov.uk/government/publications/provision-of-accommodation-for-16-and-17-year-olds-who-may-be-homeless-and-or-require-accommodation

10.8 So-called 'honour-based' abuse (including Female Genital Mutilation (FGM) and Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, already having suffered HBA.

10.8.1 Actions

Staff concerned about a child that might be at risk of HBA or who has suffered from HBA, should speak to the DSL or (deputy). As appropriate, the DSL will activate local safeguarding procedures, using existing national and local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach.

10.9 Female genital mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long- lasting harmful consequences.

10.9.1 FGM Mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by 'to discover that an act of FGM appears to have been carried out' is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's DSL (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.
https://www.gov.uk/government/publications/fact-sheet-on-mandatory-reporting-of-female-

genital-mutilation is a useful summary of the FGM mandatory reporting duty.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation - GOV.UK (www.gov.uk) and the https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack particularly section 13.

10.10 Forced marriage

Forcing a person into a marriage is a crime in England and Wales. Since February 2023, it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf and https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf

Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

10.11 Child on child abuse

All staff recognise that children can abuse their peers (including online) and are clear about the Trust's policy and procedures regarding child-on-child abuse. Staff are also aware that child on child abuse may be taking place but may not be reported. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The Trust and its Academies operate a zero-tolerance approach to child-on-child abuse which will never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

The Trust recognises that it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously; and the different forms of child-on-child abuse can take, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence and sexual harassment Sexual violence and sexual harassment between children in schools and colleges - GOV.UK (www.gov.uk).
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi-nudes' images and or videos

(also known as sexting or youth produced sexual imagery).
- Sharing nudes and semi-nudes: how to respond to an incident (overview) - GOV.UK (www.gov.uk)
- upskirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any sex, can be a victim. (The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act 2019).
- initiation/hazing type violence and rituals.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff

Such behaviour will be dealt with in line the Academy's Behaviour Policies and the Trust's suite of policies which support safeguarding.

10.12 Sexual violence and sexual harassment between children in schools and colleges
Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

All victims will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report.

Staff are aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ children are at greater risk.

Staff are 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.
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

The Academy plays a crucial role in preventative education and is most effective in a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment. All Academies have a clear set of values and standards, upheld throughout all aspects of Academy life. These will be underpinned by the Academy's Behaviour Management Policy and pastoral support system, as well as by a planned programme of evidence based RSHE

delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. The programme is fully inclusive and developed to be of age and stage of development appropriate especially when considering the needs of children with SEND and other vulnerabilities.

This program will tackle at an age-appropriate stages issues including:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice, and equality
- Body confidence and self-esteem
- How to recognise abusive relationships, 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, and
- What constitutes sexual harassment and violence and why these are always unacceptable.
- How to access advice and support independently through the likes of Lucy Faithfull Foundation's 'Shore Space', (a confidential chat service for young people concerned about their own, or someone else's sexual thoughts and behaviours as recommended in KCSIE 2025).

10.12.1 What is sexual violence and sexual harassment?
Sexual violence It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

10.12.2 What is consent?
Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only

if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: https://rapecrisis.org.uk/get-informed/about-sexual-violence/sexual-consent/

It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion, or exploitation.
Due to their additional training, the designated safeguarding lead (or deputy) should be involved and leading Academy response.

If in any doubt, they should seek expert advice.

- a child under the age of 13 can never consent to any sexual activity.
- the age of consent is 16.
- sexual intercourse without consent is rape.

10.13 Sexual harassment
When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- sexual "jokes" or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

  - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk) http://www.childnet.com/our-projects/project-deshame from Childnet provides useful research, advice, and resources regarding online sexual harassment. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
  - sharing of unwanted explicit content.
  - upskirting (is a criminal offence)
  - sexualised online bullying.
  - unwanted sexual comments and messages, including, on social media.
  - sexual exploitation; coercion and threat.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) is an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be

exacerbated if the alleged perpetrator(s) attend the same educational establishment.

Whilst any report of sexual violence or sexual harassment will be taken seriously, staff are aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff are also aware of the importance of:

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

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made. Any decisions made will be on a case-by case basis with the designated safeguarding lead (or a deputy) taking a leading role, using their professional judgement, supported by other agencies such as children's social care and the police as required.

Sexting is specifically addressed in Appendix 3 and responding to reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside Academy premises, and/or online are set out in Part Five in KCSIE 2025.

Part Five of KCSIE 2025 should be read alongside Sexual violence and sexual harassment between children in schools and colleges.

10.14 Serious violence

Staff are aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff will be aware of the range factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice is provided in the Home Office's
Advice to schools and colleges on gangs and youth violence - GOV.UK (www.gov.uk) and https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines.

10.15 Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this should be part of a schools' or colleges' safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of those with different faiths and beliefs.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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 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.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern Managing risk of radicalisation in your education setting - GOV.UK (www.gov.uk)

Academy staff are trained in identifying the risks associated with extremism and opportunities are provided within the Academy's curriculum to allow students to discuss issues of ethnicity, culture and religion in line with **Promoting fundamental British values as part of SMSC in schools**

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risk, staff should be alert to challenges in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or Deputy) Making a referral to Prevent - GOV.UK (www.gov.uk)

The Academy DSL (and Deputies) are aware of local procedures for making a Prevent referral.

10.15.1 The Prevent Duty

As part of the Counter Terrorism and Security Act 2015, section 26, academies have a duty in the exercise of their functions, to have 'due regard to the need to 'prevent people being drawn into terrorism'. This is known as the 'Prevent Duty'.

The Prevent Duty is seen as part of the Trust and Academies wider safeguarding obligations. DSL's and senior leaders are familiar with the Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk) particularly paragraphs 57-76, which are specially related to schools.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the Academy's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just, and civil society.

10.15.2 Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider appropriate support required. A representative from the Academy will attend the Chanel panel if requested. An individual will be required to provide their consent before any support delivered through the programme is provided.

Guidance on Channel is available at
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf

10.16 Private fostering

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

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

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

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

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

Academy staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The Academy itself has a duty to inform the local authority of the private fostering arrangements.

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

10.17 Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org

10.18 Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children Young witness booklet for 5 to 11 year olds - GOV.UK (www.gov.uk) and Young witness booklet for 12 to 17 year olds - GOV.UK (www.gov.uk) The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online Get help with child arrangements - Get help with child arrangements (justice.gov.uk) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

10.19 Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and criminal exploitation – particularly county lines. The Trust and its Academies recognise the importance of their response to persistently absent pupils/students and that children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This will include when problems are first emerging and also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

10.20 Children missing in education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, 'honour'-based abuse, or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the Academy's unauthorised absence procedures and the Trust's children missing from education procedures.

10.21 Children with family members in prison

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

10.22 Children at potentially greater risk of harm

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.
Local authorities should share the fact that a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762826/Children_in_Need_of_help_and_protection-Interim_findings.pdf contains further information, the conclusion of the review, Help, protection, education sets out action Government is taking to support this.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809236/190614_CHILDREN_IN_NEED_PUBLICATION_FINAL.pdf

10.23 Children requiring mental health support

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.

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

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

Where children have suffered abuse, neglect, exploitation or other potentially traumatic childhood experiences, this can have a lasting impact through childhood, adolescence and into adulthood. It is key that staff are aware of how children's experiences, can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also safeguarding concern, immediate action should be taken, in accordance with this policy and speaking to the designated safeguarding lead or deputy.

The department has published advice and guidance on Preventing and tackling bullying and Mental health and behaviour in schools. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing.

The Academy has a mental health lead in place. The DfE provides practical evidence informed resources to support mental health leads to fulfil their role including a targeted support toolkit. Additional guidance, and resources can be found https://www.mentallyhealthyschools.org.uk/whole-school-or-college-resources/

10.24 Children in care and children previously in care

The most common reason for children becoming looked after is because of abuse and/or neglect. The Trust will ensure that staff have the skills, knowledge and understanding to keep children in care safe.

Appropriate staff will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They will also have information about the childcare arrangements and the levels of authority delegated to the carer by the responsible authority. The DSL will have details of the child's social worker and the name of the Virtual Head in the authority that looks after the child.

In addition to their statutory duties, the role of Virtual School Heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of educational attendance, attainment, and progress of children with a social worker.

A previously looked after child potentially remains vulnerable and all staff will have the skills, knowledge and understanding to keep children previously in care safe. When dealing with children in care and children previously in care, the Trust recognises the importance of all agencies working together and taking prompt action when necessary to safeguard these children, who are a particularly vulnerable group.

11. Other relevant information

11.1 Online safety

The use of technology has become a significant component of many safeguarding issues. CSE, radicalisation, sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identity, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- Contact: being subjected to harmful online interaction with other users; for example, child to child 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, for example making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. Should the Trust feel that pupils, students and/or staff are at risk, it will be reported to the Anti-Phishing Working Group https://apwg.org/

The Trust will ensure that online safety is a running and interrelated theme when devising and implementing their whole school approach to safeguarding and related policies and procedures. Consideration will be given to how online safety and filtering and monitoring is reflected in all relevant policies and when planning the curriculum, teacher training, the role, and responsibilities of the DSL (and deputies) and parental engagement.

The Trust will do all it reasonably can to limit children's exposure to the above risks from the Academies IT systems.

The Trust has appropriate filters and monitoring systems in place in all Academies.

The filters and monitoring systems are age appropriate and are informed in part by the risk assessment required by the Prevent Duty.

The Trust acknowledges that whilst filtering and monitoring is an important part of the online safety picture, it is only one part. The Trust has a 'whole school approach' and all Academies have in place a clear policy on the use of mobile technology in school. The filters and monitoring systems implemented will not 'over block' to ensure that this does not lead to unreasonable restrictions as to what children can be taught about online teaching and safeguarding. The use of Smooth wall software in all Academies across the Trust ensures that the DSL receives swift alerts when any misuse occurs.

As Academies are in close contact with parents/carers those communications will be used to reinforce the importance of children being safe online. Parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being

asked to do online, including the sites they will asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online

Where children are asked to learn online (remote learning) at home the Trust will follow department advice:

https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19

https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/guidance-for-full-opening-schools#res

https://learning.nspcc.org.uk/news/covid/undertaking-remote-teaching-safely

11.2 Procedures for transporting students in an emergency

The school minibus will undergo regular inspection / checks to ensure it is well maintained and safe. Only during exceptional circumstances will staff give students a lift home. Staff are first expected to have agreement from a named member of SLT first and must have business insurance on their vehicle to allow this to happen. Parents/carers must be informed via telephone. Two members of staff should accompany the child in the car wherever possible, however, it is acknowledged that on occasion this may not be an option. The child MUST travel in the rear seats of the car and wear seatbelt etc.
Should a taxi be used to transport a student home then the Academy will ensure the driver is DBS checked.

11.3 Extended Academy and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended Academy activities are provided by and managed by the Academy, our own child protection policy and procedures apply. The Academy will ask parents/carers to complete an EV4 form annually in respect of such activities.

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

Where the Trust hires or rents Academy facilities/premises to organisations or individuals (including community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.

The Trust will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and will inspect them as needed as well as ensuring that arrangements are in place to liaise with the Academy on these matters where appropriate. The Trust will also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply will result in termination of the agreement.

11.4 Photography and images

Most people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. Sadly, some people abuse children through taking or distributing images, so we must ensure that we have some safeguards in place.
To protect pupils, we will:

- seek parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- use only the pupil's first name with an image
- ensure pupils are appropriately dressed

- encourage pupils to tell us if they are worried about any photographs that are taken of them
- all visitors will be given a trust safeguarding information on arrival which makes clear they must not take any photographs of students whilst on site or discuss the nature of their visit on social media without prior consent given from the Academy.

11.5 Behaviour
Expectations of behaviour in each Academy are clearly set out in local policies. Careful monitoring is essential to identify any difficulties a pupil may be experiencing which may in turn, indicate safeguarding concerns.

11.6 Racist incidents
Racist incidents must always be reported via CPOMS, are dealt with in accordance with our behaviour polices. Depending on the circumstances of the case, they may also be managed under the safeguarding policy as with other forms of harassment and abuse.

11.7 Health & Safety
The Trust's Health & Safety policy, set out in a separate document, is reviewed every two years by the Trust. It reflects the consideration the Trust and its Academies give to the protection of our children both within the Academy environment and when away from the Academy when undertaking trips and visits.

11.8 Work experience
The Academy has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with the guidance in Keeping Children Safe in Education (2025).

11.9 Children staying with host families
The Academy may plan for pupils to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the Academy follows the guidance in Keeping Children Safe in Education (2025), to ensure that hosting arrangements are as safe as possible.

Some overseas pupils may reside with host families during Academy terms, and we will work with the local authority to check that such arrangements are safe and suitable.

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

11.10 Elective home education (EHE)
All Academies will comply with the Education (Pupil Registration) (England) Regulations 2006 which were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.
Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, Academies will work with the LA and other key professionals to coordinate a meeting with parents/carers where possible. The Trust acknowledges that this requirement does not apply where a pupil's name is deleted after they have completed the final year at the school (e.g., Year 6 at a typical primary school) unless the LA have asked to be informed about such deletions. The Trust recognises that ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child and that it is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Staff in Academies dealing with requests from parents/carers regarding EHE will have regard for the DFE guidance for local authorities on elective home education. https://www.gov.uk/government/publications/elective-home-education

11.11 Early help means providing support as soon as a problem emerges at any point in a child's

life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

11.12 Statutory assessments
Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local authority's referral process.

11.13 Children suffering or likely to suffer significant harm
Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation, sexual abuse, sexual exploitation, and county lines.

12. Taking action to ensure that children are safe at their Academy and at home
It is not the responsibility of Trust staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of students will be recorded and discussed with the Designated Safeguarding Lead with responsibility for child protection (or another senior member of staff in the absence of the designated person) prior to any discussion with parents/carers.

12.1 Staff will immediately report
- Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- Any explanation given which appears inconsistent or suspicious.
- Any behaviours which give rise to suspicions that a child may have suffered harm (e.g., worrying drawings, writing or acts).
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- Any concerns that a child is presenting signs or symptoms of abuse of neglect.
- Any significant changes in a child's presentation, including non-attendance.
- Any hint or disclosure of abuse from any person.
- Any concerns regarding person(s) who may pose a risk to children (e.g., living in a household with children present).
- Staff should be aware that children with SEND may face additional safeguarding challenges and should ensure that any potential barriers to them reporting concerns are removed.
- If a teacher, during their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the designated safeguarding lead, who will inform the Police.
- Any children who they believe may benefit from early help, this includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

12.2 Responding to Disclosure
Disclosures or information may be received from students, parents/carers, or other members of the public. The Academy recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, staff will handle

disclosures with sensitivity.
Such information cannot remain confidential, and staff will immediately communicate what they have been told to the designated person and make a contemporaneous record.

12.2.1 Principles
Staff will not investigate but will, wherever possible, elicit enough information to pass on to the designated person in order that s/he can make an informed decision of what to do next.

12.2.2 Staff
Staff will:

- Listen to and take seriously any disclosure or information that a child may be at risk of harm.
- Try to ensure that the person disclosing does not have to speak to another member of the Academy's staff.
- Try to keep questions to a minimum and of an 'open' nature e.g., 'can you tell me what happened?' rather than 'did X hit you?'
- Try not to show signs of shock, horror, or surprise.
- Not express feelings or judgements regarding any person alleged to have harmed the child.
- Explain sensitively to the child that they have a responsibility to refer the information to the Designated Safeguarding Lead.
- Reassure and support the child as far as possible.
- Explain that only those who 'need to know' will be told.
- Explain what will happen next and that the child will be involved as appropriate.
- Reassure the child that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor will a victim be made to feel ashamed for making a report.

12.3 Action by the DSL (or other senior person in their absence)
Following any information raising concern, the DSL will complete the DSL Checklist (Appendix 4) and consider:

- Any urgent medical needs of the child.
- Making an enquiry to the Child Protection Register.
- Discussing the matter with other agencies involved with the family.
- Liaising with the three safeguarding partners and working with other agencies in line with Working together to safeguard children - GOV.UK (www.gov.uk) WHEN TO CALL THE POLICE should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- The child's wishes.
- Any suspicion of female genital mutilation of a girl under 18 years of age will be reported to the Police and Children's Social Care.

Then decide:

- Wherever possible, to talk to parents/carers, unless to do so may place a child at risk of significant harm, impede any Police investigation and/or place the member of staff or others at risk.
- Whether to make a child protection referral to Children's Social Care or the Police because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken

immediately.

OR

- Not to make a referral at this stage.
- If further monitoring is necessary.
- If early help is appropriate the designated safeguarding lead should support the through liaising with other agencies and setting up an inter-agency assessment as appropriate and then ensure the case is kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.
- If it would be appropriate to make a referral for other services.

Referrals should ideally be made by a designated safeguarding lead, however in their absence, anyone can make a referral. Where referrals are not made by the designated safeguarding lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made.

All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals to Social Care will be accompanied by a standard Referral Form.

12.4 Action following a child protection referral

The Designated Safeguarding Lead or other appropriate member of staff will:

- Make regular contact with Children's Social Services.
- Contribute to the Strategy Discussion and Initial Assessment.
- Provide a report for, attend, and contribute to any subsequent Child Protection Conference.
- If the child or children have a Child Protection Plan, contribute to the Child Protection Plan, and attend Core Group Meetings and Review Child Protection Conferences.
- Share all reports with parents prior to the meetings.
- Where in disagreement with a decision made e.g., not to apply Child Protection Procedures or not to convene a Child Protection Conference, discuss this with the LADO.
- Where a child is having a Child Protection Plan moves from an Academy or goes missing, immediately inform the key worker in Social Services.

12.5 Recording and Monitoring

Each Academy will record:

- Information about the child: name, address, D.O.B, those with parental responsibility, primary carers, emergency contacts, names of persons authorised to collect from the Academy, any court orders, if a child has been subject to a Child Protection Plan
- Key contacts in other agencies including GP details
- Any disclosures/accounts from child or others, including parents/carers (and keep original notes)
- All concerns, discussions, decisions, actions taken (dated, timed, and signed) and

arrangements for monitoring / reviewing.

The Academy will also monitor:

- Injuries/marks
- Attendance
- Changes e.g., mood/academic functioning
- Relationships
- Language
- Behaviour
- Demeanour and appearance
- Statements and comments
- Medicals
- Stories, 'news', drawings
- Response to PE/sport
- Family circumstances
- Parental behaviours/care of child

Records should 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.

The DSL can provide staff advice and guidance in respect of recording requirements.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. All child protection documents will be retained in a 'Child Protection' file, separate from the child's main file. This will be locked away and only accessible to the Head of School/Headteacher and Designated Safeguarding Lead. These records will be copied and transferred to any school or setting the child moves to, clearly marked 'Child Protection, Confidential, for the attention of the Designated Safeguarding'.

If the child goes missing from education or is removed from roll to be educated at home than any Child Protection file should be copied, and the copy sent to the appropriate officer at the Local Authority. Secondary Academies will retain all original copies of child protection files until the child's 25th birthday.

12.6 Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including exploitation by criminal gangs and organised crime groups such as county lines; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so **it is important that schools provide as much information as possible as part of the referral process.** This will

allow any assessment to consider all the available evidence and the full context of any abuse.

12.7 Supporting the child and partnership with parents/carers
The Trust recognises that the child's welfare is paramount, however, good child protection practice and outcomes rely on a positive, open, and honest working partnership with parents/carers.

Whilst we may, on occasion, need to make referrals without consultation with parents/carers, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.

We will provide secure, caring, supportive and protective relationships for the child

Children will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why.

We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents/carers. The Designated Safeguarding Lead will determine which members of staff 'need to know' personal information and what they 'need to know' for supporting and protecting the child.

12.8 Children in care and children previously in care
Training and induction undertaken by staff ensures that they have the skills, knowledge and understanding to keep children in care safe.
Appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Information is also held about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.
The designated safeguarding lead has details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
Staff within the Trust's academies are committed to working together with all agencies and ensuring prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

12.9 Children with Special Education Needs and Disabilities
Any reports of abuse involving children with SEND will require a close liaison with the DSL (or deputy) and the SENCO.

The Academy will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Staff are aware that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. They are also made aware training and induction to:

- Guard against assumptions that possible indicators of abuse such as behaviour, mood and injury relate to the child's disability.
- Recognise that this group of students may be more prone to peer group isolation than other children and refer this to the relevant member of the pastoral.
- Recognise the potential for children with SEND being disproportionally impacted by behaviours such as bullying without showing any signs.
- Recognise that students with SEND may face difficulties in communicating concerns.
- To address the additional challenges, academies within the Trust might assign a key

worker or seek to provide other additional pastoral support for children with SEND.

12.10 Children who are lesbian, gay, bi or trans (LGBTQ+)

The fact that a child or young person may be LGBTQ+ is not in itself an inherent risk factor for them. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnosis of autism and/or ADHD.

It is expected that there will be an update with signposts and guidance over the coming months from the DfE.

When families/carers are making decisions about support for gender questioning children, they will be encouraged to seek clinical help and advice.

When supporting a gender questioning child, a cautious approach will be taken and consideration given to the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The Trust and its Academies will refer to the DFE Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children who are LGBT or questioning their gender lack a trusted adult. with whom they can be open. Staff will endeavour to reduce the additional barriers faced and all Academies should provide a safe space where they can speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education curriculum and there is a range of support available to help Academies counter homophobic, biophobic, and transphobic bullying and abuse.

13. Allegations regarding Person(s) working in or on behalf of the Trust (including supply staff, volunteers, and contractors) who may pose a risk of harm to children

Where an allegation is made against any person working in or on behalf of the Trust (including supply staff and volunteers), that he or she has:

- behaved in a way that has harmed a child and/or may have harmed a child.
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicated s/he is unsuitable to work with children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work

with children.

The Trust will act in accordance with Part 4 of Keeping Children Safe in Education 2025 when dealing with allegations against a person who works with children and young people (Appendix 5).

Detailed records will be made to include decisions, action taken and the reasons for these. All records will be retained securely.

Whilst we acknowledge that such allegations (as all others) may be false, malicious, or misplaced, we also acknowledge that they may be founded. The Trust will ensure that all allegations are investigated properly and in line with agreed procedures.

13.1 Initial Action

The person who has received the allegation or witnesses an event must immediately inform the Head of School/Headteacher. If the allegation is against the Head of School/Headteacher they must inform the Chair of the School Governors Who will then inform the Chair of Trustees.

The Head of School/Headteacher will take steps and may include the Designated Safeguarding Officer in securing the immediate safety of children and any urgent medical needs.

The member of staff against whom the allegation has been made, will not be approached at this stage unless it is necessary to address the immediate safety of children.

The Director of HR will be informed and will provide advice/guidance. The Head of School/Headteacher may need to clarify any information regarding the allegation, however, no person will be interviewed at this stage.

The Head of School/Headteacher will consult with the Local Authority Designated Officer (LADO) to determine if it is appropriate for the allegation to be dealt with by the Academy or if there needs to be a referral to social services and/or Police for investigation.

Consideration will be given throughout to the support and information needs of students, parents, and staff.

Where a staff member feels unable to raise an issue regarding an allegation with the Head of School/Headteacher or feels that their genuine concerns are not being addressed, they should refer to the Chair of School Governors.

14. Organisations or individuals using school premises

Should an Academy receive an allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children (examples include community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, Academies will follow the Trust's safeguarding policies and procedures, including informing the LADO.

Appendix 1

Local Safeguarding Partner Arrangements

Locality	Safeguarding Partner	Local Safeguarding Partnership Links	Local Area Designated Officer (LADO)	Contact details
Endeavour Academy	Durham	www.durham-scp.org.uk/professionals	Sharon Lewis/Louise Brooks	Telephone No: 03000 268835 Contact is via telephone only.
	Sunderland	www.safeguardingchildrensunderland.com	Danielle Rose	Telephone No: 0191 561 3901 Email: Lado@togetherforchildren.org.uk
	Hartlepool	Hartlepool and Stockton-on-Tees Safeguarding Children Partnership (HSSCP)	Phil Curtis	LADO@hartlepool.gcsx.gov.uk

Appendix 2

Safeguarding Leads and Safeguarding Governors

Academy	Designated Safeguarding Lead	Deputy Designated Safeguarding Lead	Safeguarding Governor
Endeavour	Mrs L Wood	Mr J Greenall, Ms A Pattinson	Mr G Corcoran

Appendix 3

Sexting and Searching

Definition of 'sexting'

There are several definitions of sexting but for the purposes here, sexting is simply defined as sharing nude and semi-nude images or videos generated: by children under the age of 18, or of children under the age of 18, that are of a sexual nature or are indecent.

These images are shared between young people and/or adults via a mobile phone, handheld device, or website with people they may not even know. There are many different types of sexting, and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit. It is important to apply a consistent approach when dealing with an incident to help protect yourself, the school, and the child. The range of contributory factors in each case also needs to be considered to determine an appropriate and proportionate response. All staff should be familiar with this policy.

Dealing with Incidents of Sexting

STEP 1: Disclosure by a child.
Sexting disclosures should follow normal safeguarding practices. A child is likely to be very distressed, especially if the image has been circulated widely and if they do not know who has shared it, seen it or where it has ended up. They will need support during the disclosure and after the event. They may even need immediate protection or a referral to Social Care.

The following questions will help decide upon the best course of action:

● Is the child disclosing about themselves receiving an image, sending an image, or sharing an image?
● What sort of image is it?
● Is it potentially illegal or is it inappropriate?
● Are the Safeguarding Policy and practices being followed?
● How widely has the image been shared and is the device in their possession?
● Is it a school device or a personal device?
● Does the child need immediate support and/or protection?
● Are there other children and/or young people involved?
● Do they know where the image has ended up?

The situation will need to be handled very sensitively to ensure the school

safeguarding and On-line Safety policies and practices are adhered to.

STEP 2: Searching a device

In an Academy-based context, it is highly likely that the image will have been created and potentially shared through mobile devices. It may be that the image is not on one single device: it may be on a website or on a multitude of devices; it may be on either a school-owned or personal device. It is important to establish the location of the image but be aware that this may be distressing for the young person involved, so be conscious of the support they may need.

The revised Education Act 2011 brought to bear significant new powers and freedoms for teachers and schools. Essentially, the Act gives schools and/or teachers the power to seize and search an electronic device if they think there is good reason for doing so. A device can be examined, confiscated, and securely stored if there is reason to believe it contains indecent images or extreme pornography.

However, the decision to view imagery should be based on the professional judgement of the designated safeguarding lead and should always comply with the child protection policy and procedures of the school.

Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil.

If a decision is made to view imagery the designated safeguarding lead would need to be satisfied that viewing:

- is the only way to decide about whether to involve other agencies (i.e., it is not possible to establish the facts from the young people involved?)
- is necessary to report the image to a website, app, or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network.

In line with Searching, Screening and Confiscation advice: https://www.gov.uk/government/publications/searching-screening-and-confiscation, if it is necessary to view the imagery then the DSL should:

- Never copy, print, or share the imagery; this is illegal.
- Discuss the decision with the Headteacher.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher.
- Ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school or college premises, ideally in the Headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the

same sex as the young person in the imagery.

- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions
- Ensure this is signed and dated

If any illegal images of a child are found, you should consider whether to inform the police. Any conduct involving, or possibly involving, the knowledge or participation of adults should always be referred to the police. In such cases the device will be retained and handed to police.

Do not search the device if this will cause additional stress to the child/person whose image has been distributed.

Never:

- Search a mobile device even in response to an allegation or disclosure if this is likely to cause additional stress to the child UNLESS there is clear evidence to suggest that there is an immediate problem
- Print out any material for evidence
- Move any material from one storage device to another
- View the image unless there is a clear reason to do so (see above)
- Send, share, copy or save the image anywhere
- Allow children to do any of the above

Always:

● Inform the Designated Safeguarding Lead
● Record the incident
● Act in accordance with the Safeguarding Policy and procedures
● Inform relevant colleagues/senior management team about the alleged incident before searching a device
● Confiscate and secure the device if there is an indecent image of a child on a website or a social networking site, then you should report the image to the site hosting it.

Appendix 4

DSL Checklist

Possible Action	By Whom	Outcome
Discuss with Child		
Contact parents/carers		
Check records in school		
Discuss with relevant professionals		
Check with schools who have siblings		
Seek advice from LA		
Monitor & Review		
Consider an Early Help Plan		
Consult with Social Care		
Contact Police 101 – Non-emergency 999 – Immediate danger		
Other (please specify)		
Assessment of Risk		
Safeguarding	**Risk of Harm**	**Immediate Danger**

Appendix 5

Allegations of abuse made against teachers and other staff

This part of the guidance has two sections covering the two levels of allegation/concern:

- Section One - Allegations that may meet the harms threshold.
- Section Two - Allegations/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns.

These procedures are consistent with local safeguarding procedures and practical guidance.

Section One: Allegations that may meet the harms threshold

This part of the guidance is about managing cases of allegations that might indicate a person will pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This guidance should be followed where it is alleged that anyone working in a school or college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. (This includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as a transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. Advice may be sought from the Local Authority Designated Officer (LADO) if necessary).

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Allegations must be reported to the Executive Head, Head of School/Headteacher and/or DSL. Advice will be sought from the Director of HR in relation to the appointment of a Case Manager.

The initial response to an allegation.

Where the school or college identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should

contact children's social care and as appropriate the police immediately as per the processes explained in Section 12 of this policy.

There are two aspects to consider when an allegation is made:

- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Section 12 of this policy.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content, and context of the allegation, and agree a course of action.

When dealing with allegations, schools and colleges should:

• apply common sense and judgement.

• deal with allegations quickly, fairly, and consistently; and

• provide effective protection for the child and support the person subject to the allegation.

Schools and colleges should ensure they understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example:

• was the individual in the school or college at the time of the allegations?

• did the individual, or could they have, come into contact with the child?

• are there any witnesses? and,

• was there any CCTV footage?

These are just a sample of example questions. The Case Manager should refer to the local policy and procedure to ensure they are familiar with what initial information the LADO will require.

When to inform the individual of the allegation should be considered carefully on a case-by-case basis, with guidance as required from the LADO, and if appropriate children's social care and the police.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will

be convened in accordance with the statutory guidance https://www.gov.uk/government/publications/working-together-to-safeguard-children If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. Further information about the use of reasonable force can be found at paragraph 150 in Part 2 of this guidance and on https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools

Where the case manager is concerned about the welfare of other children in the community or the member of staff's 's family, they should discuss these concerns with the designated safeguarding lead and make a risk assessment of the situation. It may be necessary for the DSL to make a referral to children's social care.

Where it is evident that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

No further action

Where the initial discussion leads to no further action, the case manager on advice from the Director of HR and LADO will:

- Record the decision and justification for it; and,
- Agree on what information should be put in writing to the individual concerned and by whom.

Further enquiries

Where further enquiries are required to enable a decision about how to proceed, the LADO, CEO and/or Deputy CEO, Director of HR and case manager will discuss how and by whom the investigation will be undertaken by a senior member of staff. The case manager and the Director of HR will monitor the progress of cases to ensure that they are dealt with as quickly as possible using a thorough and fair process. Reviews will be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals should be set at the review meeting if the investigation continues. Advice and guidance will be sought from the LADO when considering allegations against adults working with children.

Supply teachers and all contracted staff

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures

do not fully apply, for example, supply teachers provided by an employment agency or business.

Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstance should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Governing Bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the Governing Body or proprietor when working in the school or college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the school during the investigation.

When using an agency, schools and colleges should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Suspension

Suspension should not be an automatic response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step. The Case Manager and the Director of HR will carefully consider whether the circumstances warrant suspension from contact with children at the Academy, or until the allegation is resolved. It should only be considered where there is cause to suspect a child or other children at the Academy is/are at serious risk of harm, or the case is so serious that it might be grounds for dismissal. Additional advice may also be sought from the LADO as well as police and children's social care if they have been involved. If the case manager is concerned about the welfare of other children in designated officer(s), children's social care or the police as required. But suspension is highly unlikely to be justified based on such concerns alone.

Suspension should be considered only in a case where there is cause to suspect a child or other children at the school or college is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college or until the allegation is resolved and may wish to seek advice from their personnel adviser and the designated officer(s). In cases where the school or sixth form college is made aware that the Secretary of State has made an interim prohibition order in

respect of an individual who works at the school or sixth form college, immediate action should be taken to ensure the individual does not carry out work in contravention of the order, i.e., pending the findings of the TRA investigation, the individual must not carry out teaching work.

The case manager and the Director of HR should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the designated officer(s), police, and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension. Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the school or college so that the individual does not have direct contact with the child or children concerned.
- providing an assistant to be present when the individual has contact with children.
- redeploying to alternative work in the school or college so the individual does not have unsupervised access to children.
- moving the child or children to classes where they will not encounter the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It must be made making it clear that this is not a punishment and parents/carers will be consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or work for the Trust.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager and Director of HR will consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the designated officer(s). This should also include what alternatives to suspension have been considered and why they were rejected. The Director of HR must be consulted for advice and guidance.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate

weight to their advice. The power to suspend is vested in the proprietor of the school, or governing bodies of the school or college who are the employers of staff at the school or college. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the designated officer(s) should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children to inform the school or college consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment about whether the person poses a risk of harm to children.

Supporting those involved

Duty of care

The welfare of a child is paramount (how children should be protected and supported is set out throughout this policy) and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. It is important that an employer offers appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Employers have a duty of care to their employees. They should:

• manage and minimise the stress caused by the allegation.

• inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary.

• advise the individual to contact their trade union representative, or a colleague for support.

• appoint a named representative to keep the person informed about progress of the case.

• provide access to counselling or medical advice where appropriate; and

• not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved should be:

• formally told about the allegation as soon as possible. The case manager should consult the LADO and where involved children's social care and/or the police on what information can be disclosed.

• kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member; and

• made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002.

Confidentiality and information sharing

In an allegation's management meeting or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the Academy will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case. In deciding what information is disclosed, careful consideration should be given to the provisions of the Data Protection Act 2018, the law of confidence and, where relevant, the Human Rights Act 1998.

Children's social care should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation need protection or services, so that any information obtained during those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

The Academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions made it an offence (except in the limited circumstance expressly permitted by the legislation), for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

The reporting restrictions apply until:

• the point that the accused person is charged with a relevant offence; or

• the Secretary of State122 or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a court lifts the reporting restrictions in response to a request to do so.

The legislation prevents the “publication” of material by any person that may lead to the identification of the teacher who is the subject of the allegation. “Publication” includes “any speech, writing, relevant programme, or other communication in whatever form, which is addressed to the public at large or any section of the public.” This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In circumstances where schools need to make parents aware about an allegation, they should make parents and others aware that there are restrictions on publishing information. Section 141F of the Education Act 2002 only applies to teachers in schools does not apply to colleges. Carried out by the Teaching Regulation Agency. 90

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the police wish to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates’ court to request that reporting restrictions be lifted.

The case manager should take advice from the LADO, police, and children’s social care to agree the following:

• who needs to know and exactly what information can be shared.

• how to manage speculation, leaks, and gossip.

• what, if any, information can be reasonably given to the wider community to reduce speculation; and

• how to manage press interest if, and when, it should arise.

Allegation outcomes

The following definitions will be used when determining the outcome of allegation investigations:

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

- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately the options open to the Academy depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not be the default position; an individual should be suspended only if there is no reasonable alternative.

If the allegation is substantiated and:

• the person is dismissed; resigns, or otherwise ceases to provide his or her services; or

• the employer ceases to use the person's services.

The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. In the case of a member of teaching staff at a school or sixth form college, the case manager with advice and guidance from the Director of HR must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching. There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Following a criminal investigation or a prosecution

The police should inform the LADO and the employer immediately when:

• a criminal investigation and any subsequent trial is complete,

• it is decided to close an investigation without charge, or

• it is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager and Director of HR whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should consider the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Unsubstantiated, unfounded, false, or malicious allegations

If an allegation is determined to be unsubstantiated, unfounded, false, or malicious, the LADO and the case manager along with the Executive Head, Headteacher/Head of School and DSL should consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the Academy, will in accordance with the Behaviour Policy consider whether any disciplinary action is appropriate against the individual who made the allegation.

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Guidance and advice will be provided by the Director of HR. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to assist and support in the short term may be appropriate. The case manager, Executive Head and Director of HR will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the Academy.

Managing the situation and exit arrangements

Resignations and 'settlement agreements'

Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, should not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police and/or Academy investigation where that is appropriate.

An Academy will not cease their investigations if the person leaves, resigns or ceases to provide their services. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

Wherever possible, the accused should be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise based on all the information available, should continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important

to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.

It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used. However, in limited circumstances schools and colleges sometimes use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.

Where a settlement/compromise agreement is used, the Trust will not let it prevent the employer from:

• fulfilling their legal duty to refer cases to the DBS where the referral criteria are met Non-compliance of this duty is a criminal offence; or

• providing a reference to potential employers when requested; or

• considering whether to make a referral to the Teaching Regulations Agency where the criteria are met.

Referral to DBS

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. **A referral to the DBS *must* be made if the criteria are met**. There is a legal requirement for schools and colleges to make a referral to DBS where they remove an individual from a regulated activity (or would have removed an individual had they not left) and they belief the individual has:

- Engaged in relevant conduct in relation to children and/or adults,
- Satisfied the harm test in relation to children and/or vulnerable adults; or
- Been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

The DBS will consider whether to bar the person.

Detailed guidance on when to refer to the DBS (including what is the harm test and relevant conduct), and what information must be provided, can be found on GOV.UK.

Referrals should be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. It is important that as much relevant information is provided to the DBS as possible, as it relies on the quality of information provided to them.

When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance, which can be found on GOV.UK.

Where a school or sixth form college teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.

The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person. Details about how to make a referral to the TRA can be found on GOV.UK

If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent a school or college from making a DBS referral even though the criteria for referral are met, is likely to result in a criminal offence being committed. This is because the school or college would not be complying with its legal duty to make the referral.

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated based on all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

Record keeping

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records unless the individual gives their consent for retention of the information. However, for all other allegations, it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation.
- details of how the allegation was followed up and resolved.
- a note of any action taken, and decisions reached, and the outcome as categorised above.
- a copy provided to the person concerned, where agreed by children's social care or the police; and,

- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period.

The Trust has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on record retention. This can be found on the ICO website: https://ico.org.uk/

References
Cases in which an allegation was proven to be false, unsubstantiated, or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated, or malicious should also not be included in any reference. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

Learning lessons
At the conclusion of a case in which an allegation *is* substantiated, the designated officer(s) should review the circumstances of the case with the case manager, Executive Head and Director of HR to determine whether there are any improvements to be made to the Trust procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designated officer(s) and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases the case manager, Executive Head and Director of HR should consider the facts and determine whether any improvements can be made.

Non recent allegations

Where an adult makes an allegation to the Trust and/or an Academy that they were abused as a child, the individual will be advised to report the allegation to the police. Non recent allegations made by a child, will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will

coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

Further information

https://www.app.college.police.uk/app-content/engagement-and-communication/media-relations/

Section Two: Concerns that do not meet the harm threshold (Low-level concerns)

The Trust have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from several sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or because of vetting checks undertaken. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

As part of our whole school approach to safeguarding, the Trust and its Academies will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the Trust (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Appendix 5 Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set in section one. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of Trust may have acted in a way that:

• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and

• does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

• being over friendly with children.

• having favourites.

• taking photographs of children on their mobile phone.

• engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

• using inappropriate sexualised, intimidating, or offensive language.

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

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold (see Part Four - Section one), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Staff code of conduct and safeguarding policies

As good practice the Trust set out their low-level concerns policy within their staff code of conduct and safeguarding policies. They make it clear what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e., to create and embed a culture of openness, trust, and transparency in which the Trust and Academy values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored, and reinforced by all staff.

The Trust will ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

The Trust will

- ensure their staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

- empower staff to share any low-level safeguarding concerns with the designated safeguarding lead (or a deputy).

- address unprofessional behaviour and supporting the individual to correct it at an early stage.

- provide a responsive, sensitive, and proportionate handling of such concerns when they are raised; and,

- help identify any weakness in the safeguarding system.

Sharing low-level concerns

Low-level concerns about a member of staff should be reported to the designated safeguarding lead (or deputy). Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the Headteacher/Head of School.

The Trust will ensure that the environment in our Academies is such that staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in an Academy, that concern will be shared with the designated safeguarding lead (or deputy), and/or Headteacher/Head of School, recorded in accordance with the policy and notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

All low-level concerns should be recorded in writing by the designated safeguarding lead (or deputy). The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The Academy will decide where these records are kept, they will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Academy will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within the Academy that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

The information will be retained at least until the individual leaves their employment.

References

The Trust will only provide substantiated safeguarding allegations in references.

Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

Responding to low-level concerns

Concerns about safeguarding should be reported to the designated safeguarding lead or their deputy. In accordance with the Trust policy if the concern has been raised via a third party, the designated safeguarding lead will collect as much evidence as possible by speaking:

- directly to the person who raised the concern unless it has been raised anonymously.

- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All the information will be recorded along with the rationale for their decisions and action taken.

Appendix 6

Additional Advice and Support

Abuse or Safeguarding Issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused: advice for practitioners	DFE Advice
	Domestic violence	Home Office
	National action plan to tackle child abuse linked to faith or belief	DFE advice
	Disrespect NoBody campaign	Home Office website
	https://www.iicsa.org.uk/document/guidance-note-retention-instructions-and-data-protection-requirements	
Alternative Provision	https://www.gov.uk/government/publications/alternative-provision	DFE Statutory Guidance
Bullying	Preventing and tackling bullying	DFE advice
Children and the courts	Going to court (5 to 11 year olds)	MoJ Advice
	Going to court and being a witness (12 to 17 year olds)	MoJ Advice
Children Missing from education, home, or care	Children missing education	DFE Statutory Guidance
	Statutory guidance on children who run away or go missing from home or care	DFE Statutory Guidance
	Missing children and adults strategy	Home Office Strategy
Children with family members in prison	**www.nicco.org.uk**	Barnardo's in partnership with HMP&P Service advice
Children with health needs who cannot attend school	https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-school	DFE Statutory Guidance
Child Exploitation	Criminal exploitation of children and vulnerable adults: county lines	Home Office Guidance
	Child sexual exploitation: definition and guide for practitioners	DFE
	Safeguarding children who may have been trafficked: practice guidance	DFE and HO Guidance
Contextual Safeguarding	Contextual Safeguarding Network – The Contextual Safeguarding programme, and the team who deliver it, are part of the International Centre: Researching child sexual exploitation, violence and trafficking (IC) at the University of Bedfordshire	
Covid-19	https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers	
Cybercrime	http://www.cyberchoices.uk/	NCA
Data Protection	https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice https://www.gov.uk/government/publications/data-protection-toolkit-for-schools https://ico.org.uk	DFE Guidance ICO website
Domestic Abuse	https://safelives.org.uk/	

	https://www.nspcc.org.uk https://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/#collapse_96595_0 https://www.refuge.org.uk/get-help/phone-the-helpline/	
Drugs	DfE and ACPO drug advice for schools	DFE and ACPO advice
	Drug strategy 2017	Home Office Strategy
	www.talktofrank.co.uk	Talk to Frank website
	http://mentor-adepis.org/	Website developed by Mentor UK
	https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit	
Elective Home Education (EHE)	https://www.gov.uk/government/publications/elective-home-education	DFE
Forced Marriage	https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible	DFE
Harmful Sexual Behaviour	https://www.mariecollinsfoundation.org.uk/assets/news_entry_featured_image/NWG-MCF-Parents-Leaflet.pdf https://swgfl.org.uk/	
'Honour Based Violence' (so called)	Female genital mutilation: resource pack	Home Office
	Multi-agency statutory guidance on female genital mutilation	DFE, DH and HO Statutory Guidance
	Multi-Agency Statutory Guidance for dealing with forced marriage	Foreign Commonwealth Office and Home Office
Health and Well-Being	Safeguarding children in whom illness is fabricated or induced	DFE, Department for Health and Home Office
	the Rise Above for Schools Guidance on learning in a safe environment	Public Health England resources
	Supporting pupils at school with medical conditions	DFE Statutory Guidance
	Mental health and behaviour in schools	DFE Advice
	https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing	Public Health England
Homelessness	Homelessness code of guidance https://www.gov.uk/government/publications/provision-of-accommodation-for-16-and-17-year-olds-who-may-be-homeless-and-or-require-accommodation	HCLG

Online	Sexting in schools and colleges educateagainsthate.com/ Teaching online safety in school https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings riseabove.org.uk/ https://www.thinkuknow.co.uk/ Education for a Connected World framework https://www.pshe-association.org.uk/ https://beinternetlegends.withgoogle.com/en_uk https://www.gov.uk/government/organisations/uk-council-for-internet-safety https://www.thinkuknow.co.uk/ https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes https://www.saferinternet.org.uk/ https://swgfl.org.uk/ https://www.internetmatters.org https://parentzone.org.uk/ https://www.childnet.com/resources/cyberbullying-guidance-for-schools How social media is used to encourage travel to Syria and Iraq: briefing note for schools https://learning.nspcc.org.uk/research-resources/schools/e-safety-for-schools/ Searching, screening and confiscation: advice for schools Online safety in schools and colleges: Questions from the Governing Board https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19 https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers https://swgfl.org.uk/resources/safe-remote-learning/ https://www.gov.uk/government/publications/education-for-a-connected-world https://www.childnet.com/resources/cyberbullying-guidance-for-schools http://www.educateagainsthate.com/ https://www.lgfl.net/ https://learning.nspcc.org.uk/research-resources/schools/e-safety-for-schools https://www.saferrecruitmentconsortium.org/ http://www.gov.uk/government/publications/searching-screening-and-confiscation http://www.swgfl.org.uk/	UK Council for Child Internet Safety

	https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation https://www.gov.uk/government/publications/ukcis-online-safety-audit-tool https://www.gov.uk/government/collections/online-safety-guidance-if-you-own-or-manage-an-online-platform https://www.gov.uk/government/collections/a-business-guide-for-protecting-children-on-your-online-platform	
Private Fostering	Children Act 1989: private fostering	DFE Statutory Guidance
Radicalisation	Revised Prevent duty guidance: for England and Wales	Home Office Guidance
	The prevent duty: for schools and childcare providers	DFE advice
	www.educateagainsthate.com https://prevent.lgfl.net/	DFE and Home Office
Remote learning	https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19 https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/guidance-for-full-opening-schools#res https://learning.nspcc.org.uk/news/covid/undertaking-remote-teaching-safely	DFE Advice
SEND	https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children#risk-and-vulnerability-factors	NSPCC
Sexual Violence and Sexual Harassment	https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework https://www.csnetwork.org.uk/en/beyond-referrals-levers-for-addressing-harmful-sexual-behaviour-in-schools https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/ https://www.stopitnow.org.uk/professionals-looking-for-advice/ https://rapecrisis.org.uk/ https://www.thesurvivorstrust.org/ https://www.nhs.uk/NHSEngland/AboutNHSservices/mental-health-services-explained/Pages/about-childrens-mental-health-services.aspx https://malesurvivor.co.uk/support-for-male-survivors/directory-of-services/ Help after rape and sexual assault - NHS (www.nhs.uk) https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/remove-nude-image-shared-online/ https://www.iwf.org.uk/ https://www.csnetwork.org.uk/en/beyond-referrals-levers-for-addressing-harmful-sexual-behaviour-in-schools	
Violence	Advice to schools and colleges on gangs and youth violence	Home Office advice
	Ending violence against women and girls strategy: 2016 to 2020	Home Office Strategy

	Violence against women and girls: national statement of expectations	Home Office Guidance
	Sexual violence and sexual harassment between children in schools and colleges	DFE advice
	Serious Violence Strategy	Home Office Strategy