



## **Carlton Academy Trust Safeguarding and Child Protection Policy**

**Ratified by Trust Board:**

**March 2021**

**Signed on behalf of Trust Board:**

**G Logan**

**Signed by Chief Executive Officer:**

**A Kneeshaw**

**Next Review Date:**

**March 2022**

## **Section One: Policy Aims, Definitions and Statutory Framework**

### **Policy Aims**

This policy provides a secure framework for the effective safeguarding students who attend Trust schools. It applies to all school staff, volunteers, visitors and Trustees/Governors, covering both in-school and off-site activities. It should be read alongside statutory guidance.

The main policy objectives are:

- Ensure all staff are aware of their statutory responsibilities and properly trained in recognising and reporting safeguarding issues.
- Ensuring all schools practise safe recruitment and check the suitability of staff and volunteers to work with children.
- Pro-actively teach students the skills and knowledge to keep themselves safe.
- Ensure students know that there are adults in school they can approach if worried.
- Outline procedures for identifying and reporting cases or suspected cases of abuse.
- Support students who have been abused in accordance with their agreed child protection plan.
- Establish an environment where students feel secure, are encouraged to talk and are listened to.
- Provide guidance as how to Intervene in a timely manner to provide early help when a safeguarding issue arises, and provide multi-agency support when needed.

**Safeguarding is the responsibility of all staff**, and the Trust recognises the contribution effective safeguarding practice can make in ensuring that all students feel they will be listened to and appropriate action taken if concerns are raised. This will be enhanced through establishing effective partnership working with parents/carers and other agencies.

### **Definitions**

**Safeguarding is:**

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

**Child Protection:** Activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse:** Maltreatment of a child which may involve inflicting harm or failing to act to prevent harm. Abuse may be Physical, Emotional, Sexual or Neglect.

**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.

**Sexting/Youth produced sexual imagery:** Sharing of sexual imagery (photos or videos) by children

**Three Safeguarding Partners (as defined by Keeping Children Safe in Education KCSIE):** These Local Authority (LA), the Clinical Commissioning group for the area within the LA, and the Chief Officer for police within the LA area. Together, these work to safeguard and promote the welfare of local children.

**Regulated Activity:**

Someone works in a Regulated Activity when they satisfy one of the following criteria:

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

**Legislation and Statutory Guidance**

- This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- 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](#).

## **Equality Statement**

Additional barriers may exist for some students in recognising and/or disclosing safeguarding issues. We are committed to anti-discriminatory practice in recognizing this, ensuring all children have the same protection regardless of any barriers they may face.

Students we give special consideration to include:

- Special Educational Needs (SEN) or disabilities
- Young carers
- Those who experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations such as temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Asylum seekers
- At risk due to either their own or a family member's mental health needs
- Are Looked After (LAC) or Previously Looked After Children (PLAC).

## **Section 2: Roles and Responsibilities**

### **Staff**

All staff must:

- Read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

They must also be familiar with:

- Trust Safeguarding and Child Protection Procedures as outlined in this policy.
- The identity of the Designated Safeguarding Lead (DSL)
- Be familiar with the signs of different types of abuse and neglect, and specific safeguarding issues.
- What to do if they identify a safeguarding issue or a student tells them they are being abused or neglected.

### **Designated Safeguarding Lead (DSL)**

The DSL is a senior leader with responsibility for child protection and safeguarding. Their identity will be displayed around school so that students and staff are aware of their identity. Each school will appoint someone to deputise in their absence.

The DSL will:

- Support and advise staff
- Take part in strategy discussions and inter-agency meetings or support other staff in this role
- Contribute to the assessment of children
- Refer suspected cases as appropriate to the relevant agency (Local Authority Children's Social Care; Channel programme; Disclosure and Barring Service; police)
- Keep the Head of School informed of any issues, and liaise with LA case managers and/or the Local Authority Designated Officer (LADO) as appropriate.
- Undertake regular and timely supervision

### **Trustees and Governors**

Trustees review and approve this policy ensuring it complies with law, and hold the CEO and Heads of School accountable for its implementation. One Trustee will be appointed to oversee Safeguarding and the effective implementation of this policy.

The Chair of Trustees will act as the 'case manager' should an allegation of abuse be made against the CEO.

All Trustees and Governors will be familiar with Keeping Children Safe in Education, and in particular part one of this guidance.

## **Heads of School**

Are responsible for:

- Ensuring that staff (including temporary) and volunteers are aware of our safeguarding systems.
- Displaying this policy on the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate Safeguarding and Child Protection training.
- Where appropriate, acting as the 'case manager' in the event of an allegation of abuse made against a member of staff or volunteer
- Ensuring each child in the Early Years Foundation Stage is assigned a key person

### **Section 3: Actions if Students are at Risk of Harm, Causing Concern or Make A Safeguarding Disclosure**

#### **Student is Suffering/Likely to Suffer Harm or in Immediate Danger**

Make an immediate referral to Children's Social Care and/or the police, informing the DSL of this as soon as reasonably possible afterwards. Any member of staff can make a referral using the following contact details:

***Bradford LA's Children's Social Care team may be contacted on: 01274 437500 (8:30-5:00 pm)***

***Emergency Duty Team (out of hours): 01274 431010***

***If you believe a child is at IMMEDIATE RISK OF HARM, contact the police on 999***

#### **Student Disclosures –**

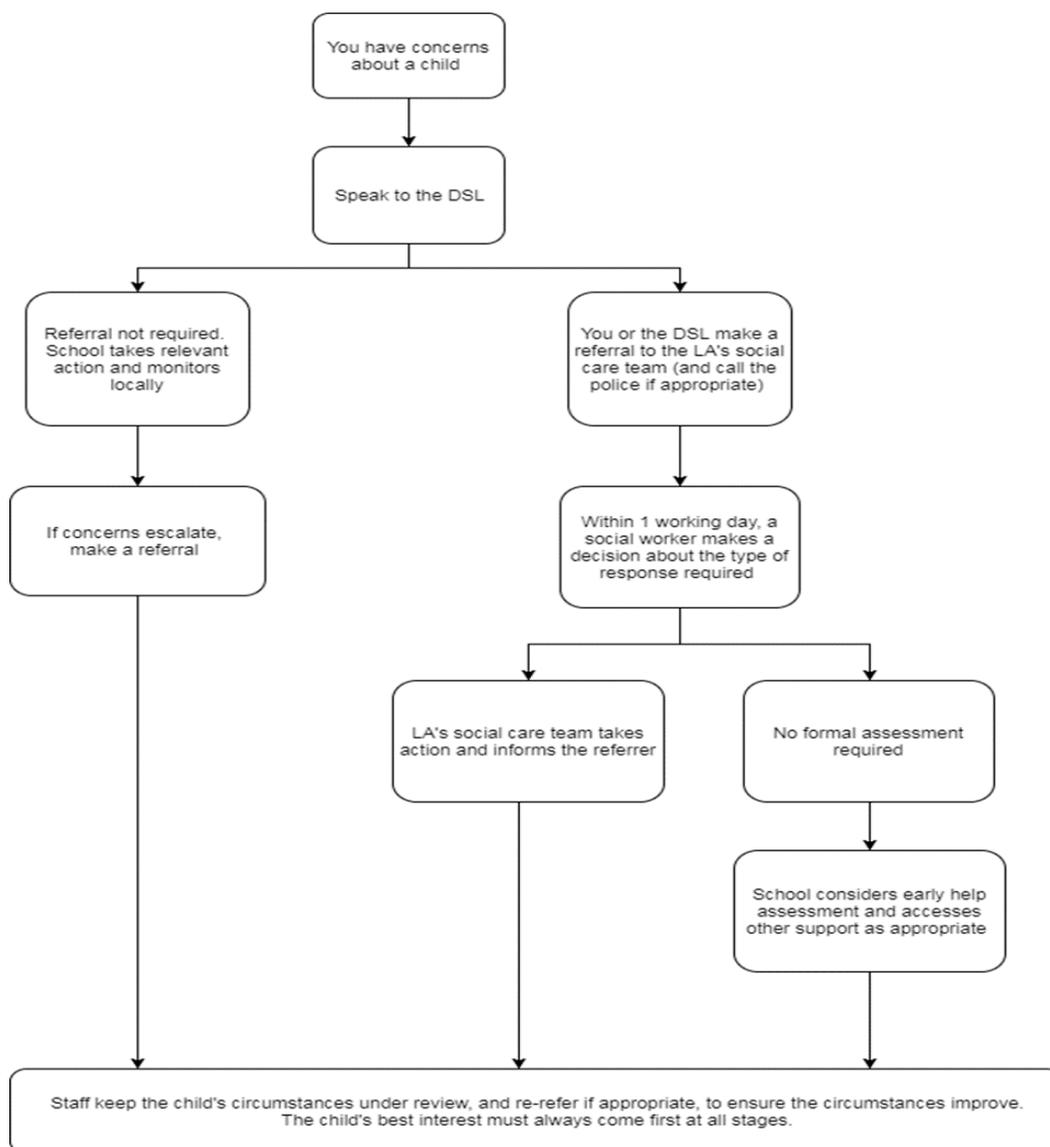
If a student discloses a safeguarding issue you should:

- Listen and believe them, allowing time to talk freely without asking leading questions.
- Stay calm and do not show that you are shocked or upset
- Assure that they have done the right thing, but do not tell them they should have told you sooner
- Explain that you will have to pass this information on and can't keep it secret
- Complete notes of the conversation as soon as possible afterwards using the student's own words, remaining factual and not adding your interpretation of events. This should be signed, dated and passed to the DSL.
- Where appropriate, make an immediate referral to Children's Social Care and/or the police

#### **Staff Have Concerns About a Student**

You may have concerns about a student based on what they have told you, something you have noticed about them, or something another professional has said or done.

It is the responsibility of all staff to share their concerns with the DSL as soon as reasonably possible, no matter how small or trivial they may appear. If the DSL is not available, speak to the Deputy or another member of the Senior Leadership Team and/or take advice from the Local Authority Children's Social Care. Advice may also be obtained from the NSPCC helpline (0808 800 5000). Details must be shared with the DSL as soon as reasonably possible. The following flowchart should be used to guide responses when staff have concerns about a student's welfare:



## **Local Authority Referrals**

When a referral is made to Children's Social Care, they will decide within 1 working day what course of action to take. The DSL/staff member making the referral must ensure that they receive this information from the Local Authority and properly record the outcomes.

If the students' circumstances do not appear to improve following the referral, the DSL will follow escalation procedures to ensure their concerns have been properly addressed.

## **Concerns about Extremism**

If a student is suffering harm/likely to suffer from harm for a reason relating to extremism, speak to the DSL to communicate your concerns.

If the DSL is not available, you should speak with the Deputy DSL, other senior leader or seek advice from Children's Social Care. Any referral to Children's Social Care should be reported to the DSL as soon as reasonably possible.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to where relevant. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the Local Authority Children's Social Care team.

The Department for Education also has a dedicated telephone helpline (020 7340 7264), which staff can contact to raise non-emergency concerns about extremism. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk).

If you think someone is in immediate danger, may be planning to travel to join an extremist group or you see or hear something that may be terrorist-related, call 999 or the confidential anti-terror hotline (0800 789 321)

## **Notifying Parents**

The DSL will discuss any concerns or disclosures with parents/carers as soon as reasonably practicable. Other staff members may only do this following consultation with the DSL.

If we believe notifying parents would increase the risk to a student, we will consider whether this is appropriate in consultation with the Local Authority Children's Social Care team.

## **Early Help**

Where early help is needed, the DSL will liaise with other agencies and arrange for an inter-agency assessment. Other staff may be required to assist an early help assessment, acting as lead practitioner. The DSL will keep the case under review and the school will consider a referral to Local Authority Children's Social Care if the situation does not improve.

## **Section 4: Recognising Abuse and Taking Action**

### **Types of Abuse**

There are four main types of abuse, as follows:

**Physical Abuse:** Includes 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 falsifies the symptoms of or deliberately induces illness in a child.

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

Emotional abuse includes:

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

**Sexual Abuse:** Involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

Activities may involve:

- Physical contact, including assault by penetration (rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching the outside of clothing
- Non-contact activities such as children looking at or producing sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

**Neglect:** Persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in the serious impairment of the child's health or development.

Examples include:

- Neglect during pregnancy as a result of maternal substance abuse.
- Failure to provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Not protecting a child from physical and emotional harm or danger
- Failure to ensure adequate supervision, including the use of inadequate care-givers
- Failure to ensure access to appropriate medical care or treatment
- Being unresponsive to a child's basic emotional needs.

## **Allegations of Abuse Made Against Other Students**

All allegations of abuse between students is unacceptable, will be taken seriously and not diminished as “banter”, “having a laugh” or ‘part of growing up’. We also recognise the gendered nature of peer on peer abuse.

There are many examples of abuse which would be dealt with under this policy including:

- Serious, and potentially criminal offences
- Incidents that put or could put students at risk
- Incidences of violence
- Students being forced to use drugs or alcohol
- Sexual exploitation, sexual abuse or harassment such as indecent exposure, sexual assault, up-skirting or sexually inappropriate pictures or videos (including sexting)

If a student makes an allegation against another student, staff must record details of the allegation, inform the DSL, but not investigate. The DSL will then take appropriate action, which includes:

- Contacting the Local Authority and/or police if it involves a criminal/potentially criminal offence
- Put a risk assessment and support plan into place for all students involved or affected by the incident.
- Contact the Children and Adolescent Mental Health Services (CAMHS), where appropriate

Schools will reduce the incidence of peer-on-peer abuse by:

- Challenging derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – such as sexualised or aggressive touching or grabbing towards female pupils, or initiation style violence for boys
- Educating students about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially
- Educating staff to understand that peer on peer abuse could be a sign that the perpetrator may be being abused themselves

## **Sexting**

Any incident involving sexting, must immediately be reported to the DSL.

You must not:

- View, download or share the imagery, or ask a student to share or download it. If you have accidentally viewed the imagery, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it
- Ask the student/s involved to disclose information regarding the imagery. The DSL will do this
- Share information about the incident with other staff, students, or parents/carers
- Say or do anything to blame or shame the students involved

You must:

- Inform the students involved that you need to report the incident to the DSL, who will support them throughout

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to students
- If it is necessary to view the imagery in order to safeguard the young person. In most cases, imagery should not be viewed.
- Further information required to enable the best response
- Whether the imagery has been widely shared and on what services and/or platforms
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant information about the students involved which would influence a risk assessment
- If there is a need to contact another school, college, agency, organisation or person
- If a referral needs to be made to the police/or Children's Social Care

The DSL will make an immediate referral to police and/or Children's Social Care if:

- The incident involves an adult
- There is reason to believe that the student has been coerced, blackmailed, groomed, or if there are concerns about their capacity to consent such as Special Educational Needs
- The imagery depicts sexual acts which are unusual for the student's developmental stage, or are violent
- The imagery involves sexual acts and any student in the imagery is under 13
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery, for example being suicidal or self-harming

Where appropriate, the DSL will interview all students involved to establish facts and assess the risks. If at any point in the process there is a concern that a student has been harmed or is at risk of harm, an immediate referral will be made to Children's Social Care and/or police.

All sexting incidents and decisions made in responding to them will be recorded in school.

**Up-Skirting:** Typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Up-skirting is now a criminal offence. All matters relating to up-skirting images must be reported to the DSL.

### **Allegations of Abuse Made Against Staff**

If you have concerns or you receive an allegation about a member of staff (including temporary/supply) or volunteer posing a risk of harm to children, speak to the Head of School. If the concerns/allegations relate to the Head of School speak to the Chief Executive Officer (CEO). If they relate to the CEO, then speak with the Chair of Trustees.

Allegations will be investigated when staff/volunteers have:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved or may have behaved towards a child/children in a way that indicates they may pose a risk of harm
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

These guidelines apply irrespective of whether the alleged abuse took place in or out of school. Allegations against staff no longer employed will be referred to the police. Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescales.

The following steps will be taken in an allegation investigation:

- The DSL will immediately discuss the allegation with the LADO, to consider the nature of the allegation and agree a course of action. This may include making further enquiries or involving the police and/or Children's Social Care. There are occasions when it is necessary to involve the police *before* consulting the LADO if the staff member is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the DSL will notify the LADO as soon as practicably possible.
- Inform the staff member of the allegations and likely course of action, as soon as reasonably possible after receiving advice from the LADO or police. Where the police and/or Children's Social Care services are involved, the DSL will only share such information with the individual as has been agreed with those agencies.
- Consider whether suspension is appropriate, employing advice from the LADO/police/Children's Social Care, as appropriate. If the decision is to suspend, the member of staff will be informed within one working day and given a named contact at the school/Trust. Decisions regarding whether to suspend or not and the reasons underpinning these must be recorded.

### **When No Further Action is Needed**

If no further action is needed, the decision and the justification for it must be recorded. The LADO will provide guidance as to what information should be put in writing and by whom, as well as any follow-up actions for the staff member and student/s making the allegation.

### **When Further Action Needed**

Where further action is needed, the school will take actions as agreed with the LADO, police and Children's Social Care, as appropriate. Measures include:

- Providing effective support for the member of staff facing the allegation through appointment of a named representative who will keep them informed of the progress of the case, as well as any other support as deemed appropriate.
- Informing the parents/carer's of the child/children involved where allowed by police and/or Children's Social Care. They will be reminded of confidentiality requirements, and will be updated on the progress of the case and outcome.
- Make a referral to the DBS where the staff member has engaged in conduct that harmed or is likely to harm a child or poses a risk to children

- Inform Ofsted of any allegations of serious harm (Early Years and Foundation Stage Students) or abuse by any person living, working, or looking after children, and actions taken in respect of these allegations. This notification will be made as soon as reasonably possible and within 14 days of the allegations being made.
- If the Secretary of State has made an interim prohibition order for a staff member, we will immediately suspend them pending the findings of an investigation by the Teaching Regulation Agency.

## **Suspensions**

Investigations will be neutral and look to both protect the child/children involved and support the member of staff who is the subject of the allegation. As such, suspension will not be automatic and only applied when any of the following apply:

- There is reason to suspect that a child/children are at risk of harm
- The case is so serious that it might constitute grounds for dismissal
- There is no reasonable alternative such as redeployment

## **Re-Deployment**

When using re-deployment, the following strategies may be applied:

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

## **Investigation Outcomes and Next Steps**

There are five possible outcomes to an investigation:

- **Substantiated:** sufficient evidence to prove the allegation
- **Malicious:** allegations disproven and there has been a deliberate act to deceive
- **False:** allegation disproven
- **Unsubstantiated:** Insufficient evidence to either prove or disprove the allegation.
- **Unfounded:** No evidence to support the allegation being made.

When an allegation is made against a supply teacher, contractor or volunteer, the school may not be involved in disciplinary procedures, but will co-operate with the investigation.

## **Action Following a Criminal Investigation or Prosecution**

The DSL will take advice from the LADO as to whether any further action is appropriate and how to proceed in respect of the individual circumstances.

## **Where an Allegation is Substantiated**

The DSL will discuss with the Director of Safeguarding and LADO whether it is necessary to refer to DBS for inclusion on the barred list. If it involves a teacher, consideration must also be made for referral to the Teaching Regulation Agency.

## **Staff Returning to Work Following Suspension**

Consideration will be made, with reference to the specific circumstances, for staff returning to work after suspension. Particular notice will be paid to working with or contact with the student/s who made the allegation.

## **Unsubstantiated or Malicious Allegations**

In these cases, the school will consider whether any disciplinary action is appropriate against any student/s who made the allegation. If the allegation was not made by a student, actions may include a referral to the police.

## **Confidentiality**

The school will maintain confidentiality in all allegations.

The DSL will take advice from the LADO, Director of Safeguarding, police and Children's Social Care as appropriate to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, and making parents aware of their obligations with respect to confidentiality
- How to manage media interest

## **Record-Keeping**

The school will maintain full records of all allegations, including a comprehensive summary of the allegations, investigation, decisions made and justification for that decision. Records will be retained in the employee's confidential personnel file until they reach normal pension age or until ten years has elapsed from the date of allegation.

Records of malicious allegations will not be kept on individual personnel files.

## **References**

References will not refer to false, unsubstantiated or malicious allegations.

## **Learning Lessons**

Where allegations are substantiated, the Trust Director of Safeguarding and LADO will determine whether improvements can be made to school safeguarding procedures.

## **Section 4: Safer Recruitment and Disclosure and Barring Service (DBS) Checks**

We record all information on checks in the school's Single Central Record (SCR) and held where appropriate, in individual personnel files.

At least one person conducting interviews will have undertaken safer recruitment training. This will include awareness of Keeping Children Safe in Education, and local safeguarding procedures.

### **New staff**

When appointing staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity.
- Obtain a separate barred list check if they begin work in regulated activity before the DBS certificate is available
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of their employment and 2 years afterwards.
- Verify professional qualifications
- Ensure teachers are not subject to a Prohibition Order
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, this will include a criminal records check for all applicants. For teaching positions, the Trust will obtain a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- Check that candidates taking up a senior leadership role are not subject to a prohibition from management (section 128) direction made by the Secretary of State
- Request written information about previous employment and check that information is not contradictory or incomplete

In primary schools' checks will be made to ensure that candidates are not disqualified under the 2018 Childcare Disqualification Regulations and 2006 Childcare Act. Where a candidate falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks, control measures, and advice received.

For teaching roles, we request references on all short-listed candidates before interview. For all other roles we will take references subject to job offers. Any concerns will be resolved before confirming appointment.

### **Existing Staff**

If we have concerns about a staff member's suitability to work with children, we will undertake relevant employment checks to establish their suitability to work in a regulated activity. Full checks will also be completed for a staff member moving from an unregulated to regulated activity.

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

- We believe they have engaged in [relevant conduct](#)
- They have received a caution or conviction for a relevant offence, or there is reason to believe they have committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency Staff**

We will obtain written notification from any agency that they have carried out the necessary recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

Any contractor working at a school will be subject to enhanced DBS and barred list checks if they are to work unsupervised in a regulated environment. We will check the identity of all contractors on arrival at the school.

In primary schools, we will ensure that we make appropriate checks on self-employed contractors (typically music teachers or sports coaches) to ensure they are not disqualified under the Childcare Disqualification Regulations 2018 and Childcare Act 2006. When they fall outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our risk assessment, control measures and advice received.

### **Student Teachers**

We will make all necessary pre-employment checks for student teachers trained directly by the Trust. Where obtained through external providers, we will obtain written confirmation from the training provider that necessary checks have been carried out and they are suitable to work with children.

In both primary schools we will ensure they are not disqualified under the Childcare Disqualification Regulations 2018 and Childcare Act 2006.

### **Volunteers**

We undertake enhanced DBS checks with barred list information for all volunteers new to working in a regulated activity. We will risk assess whether we need to seek enhanced checks for volunteers not working in regulated activities. We will never allow an unchecked volunteer to work unsupervised in a regulated activity.

In primary schools we will make additional checks to ensure that volunteers are not disqualified under the Childcare Disqualification Regulations (2018) and Childcare Act (2006). Where a volunteer falls outside of the scope of these regulations and we do not carry out these checks, we will retain a record of our assessment including our evaluation of risks, control measures, and advice received.

### **Trustees and Governors**

All Trustees, members and governors will have identity, a section 128 management, and enhanced DBS checks.

### **Alternative Provision**

When a student is placed with an Alternative Provision provider, we obtain written confirmation that they have carried out the appropriate safeguarding checks that we would otherwise perform and ensure appropriate Risk Assessments for vulnerable students are in place.

## **Section 5: Signs and Indicators of Abuse**

### **Common Signs of Abuse**

Common signs include:

- Significant behaviour change
- Extreme anger or sadness
- Aggressive or attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Sporadic or poor attendance

### **Abusive Relationships**

The signs of Abusive Relationship include the child:

- Appearing frightened of parent/s
- Acting in a way that is inappropriate for their age and development

They may also include Parents/Carers:

- Persistently avoiding services which benefit the child or treatment of their illnesses.
- Have unrealistic expectations of the child
- Frequently complain about/to the child and fail to provide attention or praise
- Be absent or misusing substances
- Persistently refuse to allow access during home visits
- Being involved in domestic abuse

Schools will also be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

### **Physical Abuse**

Common indicators are:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delays in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
  
- Repeated presentation of minor injuries, which may represent a “cry for help” and if ignored could lead to a more serious injury.
- Family using different doctors and A&E departments
- Reluctance to give information or mention previous injuries

## **Bruising**

The following must be considered as potential non-accidental causes of bruising:

- Bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, which is rarely accidental. A single bruised eye can be accidental or abusive.
- Repeated or multiple bruising to the head or places unlikely to be injured accidentally
- Variation in colour of bruising, which may indicate injuries caused at different times
- The outline of an object used such as belt marks, hand prints or hair brush
- Bruising or tears around or behind the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs which may be an indicator of sexual abuse

## **Bites**

Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

## **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious, such as:

- Circular burns from cigarettes
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid, such as a child getting into hot water. Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot bath or liquid.
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

## **Fractures**

There are grounds for concern if:

- The reasons provided are vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is taken after a period of delay
- There is an unexplained fracture in the first year of life

## **Scars**

A large number of scars, scars of different sizes or ages, or on different parts of the body all are suggestive of abuse.

## **Emotional Abuse**

The signs of emotional abuse are usually behavioural rather than physical. Emotional abuse may also indicate the presence of other kinds of abuse.

The following are indicators of emotional abuse:

- Developmental delay
- Abnormal nature or level of attachment between a child and parent/carer
- Aggressive behaviour towards others
- Scapegoating or blaming of the child within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner”, with difficulty relating to others

## **Sexual Abuse**

Students of all sexes and age may be sexually abused, and abusers can be all sexes and ages. Victims are frequently reluctant to disclose due to guilt, fear or cultural sensitivities.

Behavioural indicators include:

- Sexualised conduct, sexually explicit behaviour, play or conversation inappropriate to the child's age
- Inappropriate or excessive masturbation
- Self-harm (including eating disorders), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes, such as for sports events

Physical indicators include:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

## **Section 6: Safeguarding Areas of Concern**

This section outlines how schools deal with specific safeguarding issues.

### **Children Missing from Education (CME)**

A child going missing from education may be a sign of a wide range of safeguarding issues, so will always be treated seriously. Relevant staff will be trained to identify safeguarding concerns, and where they are suspected schools will investigate further. If a student is suffering or likely to suffer from harm or in immediate danger, an immediate referral will be made to the Local Authority Children's Social Care and police. We will also immediately inform the Local Authority if a student leaves the school without a new school being named, as well as sharing information with them when a student is removed from a school roll at a non-standard time. Before any student is taken off roll, the DSL will ensure appropriate checks have been carried out prior to the removal from roll.

### **Child Criminal Exploitation (CCE)**

CCE occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity in exchange for something the victim needs or wants in order to obtain a financial or other advantage. Involvement may be consensual or be enforced through violence or threats of violence. Incidences may be online or offline, one-off or a regular occurrence. Examples include working in cannabis factories, County Lines drug running, forced shoplifting/pickpocketing or threatening other children.

Indicators include:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Changes in emotional well-being
- Using drugs and/or alcohol
- Going missing for periods of time or regularly coming home late
- Regular absence or non-attendance in school

If staff suspect CCE, they should immediately discuss their concerns with the DSL who will take appropriate safeguarding actions which include a referral to the Local Authority Children's services and police.

## **Child Sexual Exploitation (CSE)**

CSE occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. This is often in exchange for something the victim needs or wants and/or for the financial advantage or status of the perpetrator. It may be accompanied by violence or threats of violence.

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

Victims can be exploited even when the activity appears to be consensual. They may not be aware that they are being abused, and may trust their abuser and tricked into believing they are in a loving, consensual relationship.

CSE can include both contact and non-contact sexual activity, and can happen in person or online. Examples of online abuse include being persuaded or forced to share sexually explicit images, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's

immediate knowledge, for example through others copying videos or images.

Indicators also include having an older boyfriend or girlfriend, suffering from sexually transmitted infections or pregnancy.

Staff suspecting CSE should immediately report their concerns to the DSL, who will follow local safeguarding procedures including referral to the LA Children's Social Care team and police, where appropriate.

## **Domestic Abuse**

Children can be adversely affected by witnessing domestic abuse or violence with serious, long-lasting emotional and psychological implications. If police are called to an incident of domestic abuse which children have witnessed, the police will inform the DSL before the child/children arrive at school the following day. The DSL will provide support according to the child's needs.

## **Homelessness**

When occurring, the DSL will contact the local housing authority so they can raise/progress concerns at the earliest opportunity.

## **Honour-based' Abuse (HBA)**

HBA are crimes committed to protect or defend the honour of the family and/or community. They include Female Genital Mutilation (FGM), forced marriage, and breast ironing. It often involves a wider network of family or community and can include multiple perpetrators.

All forms of HBA will be treated as abuse, and where staff have a concern they should immediately speak to the DSL, who will activate local safeguarding procedures.

## FGM

FGM is an illegal procedure which comprises all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.

Any **teacher** who discovers that an act of FGM appears to have been carried out, **must immediately report this to the police**. This is a statutory duty, and staff may face disciplinary sanctions for failing to follow this guidance. They should also inform the DSL and Children's Social Care, unless specifically told otherwise. This duty does not apply when a student is deemed as being *at risk of FGM*.

**Other members of staff** who suspect a student is *at risk* of FGM or suspect that FGM has been carried out must inform the DSL and follow safeguarding procedures.

staff should never examine students for evidence of FGM. Indicators that FGM has occurred include:

- Disclosure from a student or family member that it has taken place
- Difficulty walking, sitting or sitting still for long periods, standing, or looking uncomfortable
- Spending longer than normal in the bathroom or toilet (difficulty urinating)
- Frequent urinary, menstrual or stomach problems
- Avoiding physical exercise
- Repeated or prolonged absence
- Increased emotional and psychological needs such as withdrawal, depression, or significant behavior changes
- Reluctance to undergo medical examination
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between the legs

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

- Family history of FGM (biggest risk factor)
- FGM practiced in the community or country of origin
- Parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to safeguarding issues
- Having a mother, older sibling or cousin who has undergone FGM
- Limited level of integration within UK society
- Confiding that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help because they are aware or suspect they are at immediate risk of FGM
- Talking about FGM in conversation with others
- Unexpected absence
- Having sections missing from her Child Health Record 'Red Book' and/or attending a travel clinic or equivalent for vaccinations or medication
- Family/student already being known to social services in relation to other safeguarding issues

## **Forced Marriage**

A forced marriage is one entered into without the full and free consent of one or both parties. Coercion is used to force them in to the marriage, which may comprise physical, emotional or psychological threats.

Staff must be vigilant and aware of the 'one chance' rule, which acknowledges the need for swift action in such cases. If forced marriage is suspected, staff should immediately report their concerns to the DSL.

The DSL will then speak to the student about the concerns in a secure and private place and where appropriate, activate local safeguarding procedures and refer the case to the LADO. They can also see advice from the Forced Marriage Unit (020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk))

## **Radicalisation**

Radicalisation occurs when a student supports terrorism and extremist ideologies associated with terrorist groups. Schools have a duty to prevent students from being radicalised. The DSL will undertake Prevent awareness training and make sure all staff have access to appropriate training to allow them to identify children at risk.

School safeguarding staff will be alert to the potential threats of radicalisation based on an understanding of the local area, and advice from the LA and police.

Suitable internet filtering will be applied to prevent students accessing extreme sites while at school, with in-school education to enable them to stay safe online at home.

Radicalisation can occur quickly or over a longer period, with students with low-esteem, or victims of bullying or discrimination most at risk. Signs of radicalisation include:

- Changes in behaviour, friendship groups and appearance
- Refusal to engage with, or becoming abusive to peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Rejecting activities, they used to enjoy
- Conversion to a new religion
- Isolating themselves from family and friends
- Talking as if from a script
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Possessing extremist literature, accessing extremist material online, including social media
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Staff should immediately communicate any concerns to the DSL.

## **Section 7: Vulnerable Students**

### **Special Educational Needs and Disabilities (SEND)**

SEND students present additional barriers to the detection of abuse and neglect. These include:

- Assumptions that possible indicators of possible abuse such as behavior, mood or injury relate to SEND rather than abuse or neglect.
- SEND students being more prone to peer group isolation
- Communication difficulties

Extra school support is provided for SEND students to assist and prevent safeguarding concerns.

### **Students with a Social Worker**

Some students may have the support of a social worker due to their safeguarding or welfare needs. The DSL and other staff will work with them to support the student involved, liaising with them to offer support and deal with issues should they arise.

### **Looked-After Children (LAC) and Previously Looked-After Children (PLAC)**

The DSL will fully support and be responsible for the welfare and educational achievement of LAC and PLAC students. They will be aware of and liaise with relevant social workers and Virtual School Heads, to optimise educational progress and attainment and ensure any concerns are dealt with quickly and effectively. The DSL will also hold information about looked-after legal status, and contact arrangements with parents or those with parental responsibility.

### **Mental Health Concerns**

Mental health problems may be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. If you have a concern about a student's mental health, please refer these immediately to the DSL.

### **Non-Collection of Children**

If a child is not collected at the end of the session/day, we will contact parents/carers to ascertain the reason. If staff have any concerns they should immediately contact the DSL, who will make appropriate records.

### **Home Tuition**

Students receiving home tuition organised through a Local Authority provider, remain a safeguarding responsibility of the school. Schools will remain in regular contact with the student, parents, provider and relevant agencies to ensure their safety.

## **Section 8: Training and Administration**

### **Training**

All staff undertake Safeguarding and Child Protection and Prevent training during induction and at the start of each academic year, in accordance with statutory guidance and advice from safeguarding partner agencies. This will be complemented by updates throughout the year. They will also be issued with this policy so that they are familiar with its' contents.

The DSL and any Deputies will undertake child protection and safeguarding training at least every 2 years, whilst regularly updating their knowledge and skills at least annually through e-bulletins, meetings or other study or reading. They will also undertake Prevent awareness training. The named Prevent co-ordinator will undertake relevant training every 2 years.

Trustees and governors receive annual safeguarding training to ensure they have the knowledge to understand their responsibilities and perform their functions.

### **Visitors**

All visitors must sign in when visiting a school, and wear a visitors' badge throughout the duration of their visit. If the visitor is unknown to the school, we will check their identity, credentials and reason for visiting before allowing them entry in to any area where they can be in contact with students.

Those visiting for a professional purpose, such as school nurses or Educational Psychologists, will be asked for:

- Photo ID
- DBS certificate, or alternatively the organisation sending them will have provided prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors will be accompanied by a member of staff at all times. We will also make reasonable checks to ensure that any visitors working with or meeting students do not have extreme views or those in opposition to the school/Trust rules or counter to law.

### **Record Keeping**

All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded on CPOMs. If staff are unsure whether something should be recorded, please refer to the DSL for advice. Confidential information and records will be held securely and only available to relevant personnel.

Student safeguarding records will be retained for an appropriate period of time after they have left school. When a student with a record of safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, separate from their main student file. If the concerns are significant or complex, the DSL will liaise with the DSL of the receiving school to facilitate a safe transition.

## **Confidentiality**

All matters relating to child protection are confidential. However, timely information sharing is essential to ensure effective safeguarding and fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of students.

The following guidelines apply to personal data in the context of child protection and safeguarding:

- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- If staff are in any doubt about sharing information, they should seek advice from the DSL

The government's 'Information Sharing Advice for Safeguarding Practitioners' provides further guidance relating to information sharing.

## **Online Safety**

Online safeguarding threats are numerous, but risks can be categorised in to three categories:

- Content: being exposed to illegal, harmful or inappropriate material
- Contact: subjected to harmful online interactions
- Conduct: personal online behaviour that increases the likelihood of harm or causes harm

Schools will counter these threats through informing and educating students about online safety, with provision coordinated through a school E-Safety Officer. Any potential safeguarding issues will be reported to the DSL, who will escalate where appropriate with the LADO, Local Authority Children's Services and police.

## **Mobile Phones and Cameras**

Staff must not take pictures or recordings of students on their personal mobile phones, cameras or other devices.

## **Contextual Safeguarding**

DSL's in all Trust schools are aware of the major safeguarding issues facing their students, and will work within school, families and external agencies such as the police and Local Authority to successfully counter these threats.

External factors beyond the family often exert a significant influence on students. Prime amongst these, particularly amongst secondary students, are the peer group, criminal sub-cultures and online influences. Levels of deprivation and increase these risks, as well as the chances of suffering mental health issues. Therefore, staff must be vigilant to these influences and report any concerns they have to the DSL/safeguarding team.