Child Protection and Safeguarding Policy

Approved by:	Trust Board	**Date:** September 2023
Last reviewed on:	01.09.23	
Next review due by:	01.09.24	

Document Management Information

Applicable to:	All staff in all Academies and Central Support Services including individuals employed by the Trust, volunteers, contractors and agency staff. All Members and Trustees.
Development and Consultation:	The policy has been developed and reviewed in accordance with statutory guidance, and in consideration of an evaluation of the suitability of Trust practice.
Dissemination:	The policy will be made available to staff during induction training with all subsequent updates disseminated during annual safeguarding training as well as other routine bulletins. Copies will be provided to parents on all academy websites and held in the Trust policy centre.
Implementation:	All staff in all Academies and Central Support Services including individuals employed by the Trust, volunteers, contractors and agency staff. All Members and Trustees.
Training:	All Trustees, staff and members of the LAB will receive induction training in safeguarding policy and practice when they first join the Trust. This will include online safety and their responsibilities for filtering and monitoring. Thereafter, employees working directly with children will receive updated safeguarding training at least annually, with more frequent reminders about aspects of good practice through regular staff meetings and bulletins. Trustees and members of School LAB's will receive routine update training from the Deputy CEO. Designated Safeguarding Leads (and any deputies) will receive training in the respective local authority safeguarding partnership multi-agency procedures at least every two years. They will engage with all other local safeguarding training as it becomes available. The Deputy CEO will refresh the training of academy Designated Safeguarding leaders (and any deputies) through monthly e-bulletins and by meeting other Trust Designated Safeguarding Leaders at least three times a year.
Review Frequency:	The policy will be reviewed on an annual basis.
Policy Author:	Kim Duff, Deputy CEO
Executive Policy Owner:	Emma Simms, CEO
Approval by:	Trust Board
Approval Date:	September 2023
Next Review Due:	September 2024

Revision History

Document version	Description of Revision	Date Approved
1.0	Annual update to include further developments in practice and to comply with updates incorporated in KCSIE 2023.	September 2023

Contents

1. Introduction

1.1. Pathfinder Schools (the Trust), all its employees and volunteers, are committed to promoting the welfare of all children. The policy reflects its responsibilities in ensuring all members of the Trust create a safe environment in which children can thrive and learn. The central tenet of the Trust safeguarding provision is to consider at all times, what is in the best interests of the child.

1.2 The policy applies to all Trust premises, including Early Years Foundation Stage settings.

1.3. All members of the Trust, including volunteers and agency staff working with the Trust, play an important part in the wider safeguarding of children. No single practitioner can have a full picture of a child's needs and circumstances. Everyone from the Trust who comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action to safeguard and protect them. Each member of the Trust has a responsibility to contribute to a positive ethos by acting in accordance with this policy and wider statutory guidance so that children feel safe, secure and listened to. Staff, volunteers and supply staff are encouraged to talk about concerns with designated safeguarding leaders, and in exceptional circumstances, they should report concerns directly to children's social care.

1.4. The Trust sustains safeguarding and child protection as a priority through the strategic coordination of policy and robust practice under the leadership of Designated Safeguarding Leads at each level of the Trust and in partnership with each academy's Local Academy Board's. Academies will work closely with local authority safeguarding partners, acting in accordance with their procedures, and communicating with parents where appropriate. Safeguarding issues and contextual safeguarding risks will be explored as part of the curriculum to ensure that children are prepared to understand the wider factors that might affect their safety and welfare, and so that they are able to voice their concerns, views and give feedback.

1.5. The Trust has a zero-tolerance approach to all types of child-on-child abuse. The abuse of one child by another will never be considered as part of growing up. The Trust will recognise, acknowledge and take all reasonable steps to understand the scale of harassment and child-on-child abuse, taking an unequivocal and consistent approach to managing all such reports to promote a culture of acceptable behaviour. All victims will be reassured that they are being taken seriously, that they will be supported and kept safe.

2. Policy Scope

2.1. This policy applies to all employees, including volunteers, as well as agency staff and contractors working in partnership with the Trust, and individuals or organisations while they are using Trust premises.

2.2. It is the responsibility of all individuals in the Trust to familiarise themselves with this policy and comply with its provisions.

3. Legal and Regulatory Framework

3.1. This Policy takes its legal framework from the following legislation and statutory guidance:

- Keeping Children Safe in Education 2023

- The Education Act 2011

- The Female Genital Mutilation Act 2015

- Counter Terrorism and Security Act 2019

- The Children Act 2014

- The Children Act 1989

- Working Together to Safeguard Children 2018 (updated 2022)

- Statutory guidance on children who run away or go missing from home or care 2014

- Supervision of activity with children 2012

- The EYFS statutory Framework 2023

- Working Together to Improve School Attendance 2023

- Children missing education 2016

- Alternative provision 2016

- The Prevent Duty 2021

- The SEND Code of Practice 2020

- SEND review: right support, right place, right time 2023

- Relationships Education, Relationships and sex Education (RSE) and Health Education 2021

- Disqualification under the Childcare Act 2018

- Multi-agency statutory guidance on female genital mutilation 2020

- Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines; Handling cases of forced marriage 2023

- Promoting the education of looked after and previously looked after children 2018

- Sexual offences Act 2003

- Voyeurism (Offences) Act 2019

- The Domestic Abuse Act 2021

- Information sharing advice for safeguarding practitioners 2023

- Searching, screening and confiscation 2023

- Sharing nudes and semi nudes: advice for education setting working with children and young people 2020

- Meeting digital and technology standards in schools and colleges 2023

Safeguarding and Child Protection Policy

4.   Definitions

4.1.   **Trust** means all Academies within Pathfinder Schools, as well as Head Office and central services operations. The Trust Board is the proprietorial body with accountability for safeguarding.

4.2.   **Executive Leadership Team** means the Chief Executive Officer ("CEO") and the direct line management reports of the CEO (the "Directors").

4.3.   **Local Academy Board (LAB)** Local Academy Boards provide oversight and scrutiny at a local level.

4.4.   **Safeguarding** means promoting the welfare of all children in the following ways:

- Protecting them from maltreatment

- Preventing impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with safe and effective care

- Acting to enable all children to have the best outcomes

4.5.   **Contextual safeguarding** is understanding and responding to children's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.

4.6.   **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 relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

4.7.   **Adverse Childhood Experiences (ACEs)** are highly stressful, and potentially traumatic, events or situations that occur during childhood and/or adolescence. They can be a single event, or prolonged threats to, and breaches of, the young person's safety, security, trust or bodily integrity. Experiencing ACEs can have a detrimental impact on children's physical and mental health and wellbeing.

4.8.   **Professional curiosity** means exploring every possible indicator of abuse or neglect and trying to understand what the life of that child is like on a daily basis.

4.9.   **A child** is anyone who has not yet reached their eighteenth birthday. The Trust seeks to support all pupils, including those over the age of 18, while they are attending a Trust academy, especially those with Special Educational Needs and Disabilities (SEND) in accordance with the SEND Code of Practice.

4.10.   **Child protection** refers to the procedures and support given to children and young people who have experienced abuse in their lives or who are at particular risk.

4.11.   **Child Protection Plans:** where a child is suffering or likely to suffer significant harm as assessed under Section 47 of the Children Act 1989. Any such concerns will be referred to children's social care (and if appropriate the police) immediately.

4.12. **Children in need:** where children's complex support needs are addressed by the local authority with the academy following a referral and Section 17 assessment under the Children Act 1989. This includes children whose health and development would be impaired without the provision of services as well as those who are disabled.

4.13. **Designated Safeguarding Lead (DSL):** is a senior member of the academy leadership team who takes lead responsibility for safeguarding and child protection. The academy will decide to appoint one or more deputy designated safeguarding leads who will be trained to the same standard as the DSL.

4.14. **Local safeguarding partnership:** Multi agency working involves the safeguarding partners i.e. the local authority, clinical commissioning group for an area within the local authority (re: NHS services), and the chief officer of police, who will work together with appropriate agencies to safeguard and promote the welfare of local children.

4.15. **The Designated Officer** (sometimes still referred to as the LADO) is responsible for the oversight of allegations against adults working in the local authority, liaising with a range of agencies, and ensuring such matters are dealt with consistently and in a timely fashion.

4.16. **Early Help:** part of a continuum of support provided as soon as a problem emerges at any point in a child's life.

4.17. **Domestic abuse:** the abusive behaviour of a person towards another person is domestic abuse when both are aged over 16 and personally connected with one another. A child is the victim of domestic abuse when they hear, see or experience the effects of the abuse, and they are related to the people involved.

4.18. **Operation Encompass:** operated by all police forces in England as the means of communicating with schools when there are children in the household who have experienced an incident of domestic abuse.

4.19. **Looked after children:** this refers to a child who has been in the care of their local authority for more than 24 hours, and is living with foster parents or in a residential setting such as a children's home or secure unit.

4.20. **Previously looked after children:** those who immediately after being in care become subject to an adoption order, child arrangements order or special guardianship order.

4.21. **Private fostering:** an arrangement where a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parents or a close relative, such as grandparents, brother/sister, aunt/uncle as well as half-siblings and step parents. When a member of Trust staff becomes aware that a pupil may be in a private fostering arrangement, the local authority will be notified in order to confirm that the environment and circumstances are safe and appropriate for the child.

4.22. **Honour based abuse:** an incident or crime which has or may be committed to protect or defend the honour of the family or the community. It commonly affects women and girls, but men and boys can be harmed as well. Examples of honour based abuse include forced marriage, house arrest and honour killing.

4.23. **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 into a marriage. Threats can be physical or emotional and psychological. Forcing a person into a marriage is a crime in England and Wales. It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth 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.

4.24. **Female Genital Mutilation:** involves the partial or total removal of external female genitalia or other injury to the female genital organs for non-medical reasons.

4.25. **Child Criminal Exploitation (CCE) and County lines:** When individuals or gangs use vulnerable children and adults to transport and sell Class A drugs, primarily from urban areas into market or coastal towns or rural areas to establish new drug markets or take over existing ones. Children are involved in transporting and hiding weapons to secure dwellings so that they can be used as a base from which to sell drugs. They may be sent to another area of the country to live with a vulnerable adult whose home has been taken over by the gang in exchange for a continued drug supply. This is known as **cuckooing.** County lines is as much about modern slavery, human trafficking and exploitation as drug supply and violent crime.

4.26. **Child Sexual Exploitation (CSE):** occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity.

4.27. **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.

4.28. **National Referral Mechanism:** The NRM is a framework for identifying victims of human trafficking and ensuring the receive appropriate support.

4.29. **Reasonable grounds decision:** This is a decision that there are 'reasonable grounds to believe' that the person may be a victim of trafficking.

4.30. **Child-on-child abuse:** Children can abuse other children (referred to as child-on-child abuse), and that it can happen both inside and outside of the academy as well as online.

4.31. **Intra-familial harm** refers to abuse by a relative (such as a parent, sibling or uncle/aunt). It may include abuse by someone close to the child in other ways (such as a step-parent, a close family friend or a babysitter) i.e. the abuser feels like family from the child's point of view.

4.32. **Rape:** A person commits an offence of rape if he/they intentionally penetrates the vagina, anus or mouth of another person with their penis without consent. Sexual intercourse without consent is rape.

4.33. **Assault by penetration:** A person commits an offence if he/she/they intentionally penetrates the vagina or anus of another person with a part of their body or with anything else without consent.

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4.34. **Sexual assault:** A person commits an offence if he/she/they intentionally touches another person when the touching is sexual and without consent. For example, a single incident of kissing or touching the breasts, bottom or genitalia by one child of another without consent should be considered sexual assault.

4.35. **Causing someone to engage in sexual activity without consent**: A person commits an offence if he/she/they intentionally causes another person to engage in a sexual activity without their consent.

4.36. **Consent:** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sexual activity but not another. The age of consent is 16. A child under the age of 13 can never consent to any sexual activity.

4.37. **Sexual harassment:** unwanted conduct of a sexual nature that can occur on and offline, inside and outside the academy. Sexual harassment violates a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

4.38. **Harmful Sexual Behaviour (HSB)** Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. This HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should always be considered in a child protection context.

4.39. **Self-harm** is when children hurt themselves on purpose to relieve feelings of distress.

4.40. **Suicide ideation** means having abstract thoughts about dying by suicide or feeling that people would be better off without you. It can mean thinking about methods of suicide or making clear plans about ending one's life.

4.41. **Upskirting,** which 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.

4.42. **Sexting:** also known as youth produced sexual imagery

4.43. **Hazing:** is a ritual that involves risk, pain, or harm, typically as part of initiation into a group. Hazing often entails excessive alcohol consumption and ritualised pain endurance.

4.44. **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 different faiths and beliefs. This also includes calling for the death of members of the armed forces.

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

4.46. **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.

4.47.   **Reasonable force** covers a range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. **Reasonable** means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

4.48.   **The Harms Threshold:** An allegation that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children.

4.49.   **Transferable risk:** The behaviour of an adult that may have occurred outside the academy that might render them unsuitable to work with children at the academy.

4.50.   **Low level concern:** allegations about staff that do not meet the harms threshold but that breach the academy staff safeguarding behaviour policy.

4.51.   **Disclosure and Barring Service (DBS):** The Disclosure and Barring Service helps employers make safer recruitment decisions by issuing DBS checks that result in certificates being issued to an individual. Of the four types of check, the enhanced check with barred list(s) is suitable for individuals working with children because it is checked against the Barred Lists of individuals barred from engaging in regulated activity. This regulated activity includes teaching, training or instruction with children, providing advice or guidance to children, driving a vehicle for children or providing personal and health care to children.

4.52.   **Teacher Regulation Agency (TRA):** acts on behalf of the Secretary of State for Education, and is responsible for investigating allegations of serious misconduct against teachers and headteachers in schools in England.

4.53.   **The Data Protection Act 2018 and GDPR**: do not prevent the sharing of information for the purposes of keeping children safe. 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.

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

4.55.   **Filtering:** Installing appropriate filters in the IT system to limit pupils' exposure to risks by blocking harmful or inappropriate content.

4.56.   **Monitoring:** Monitoring user activity on academy devices to review without preventing them from accessing material through internet searches or software. Searches that cause concern are reported to the DSL.

5.   The Trust's commitment to safeguarding.

5.1.   Each academy will implement the Trust policy, adding further details relevant to the academy in an academy Safeguarding and Child Protection policy appendix to include all practical details relevant to creating a robust safeguarding culture as follows:

5.1.1. The name of the Trustee and the Trust management team representatives with designated responsibility for safeguarding, including the Deputy CEO .

5.1.2. The names of the academy Designated Safeguarding Lead (DSL), who must be a member of the academy leadership team, the deputy designated safeguarding leads and cover arrangements to ensure qualified personnel are always on duty at the academy during term time and that there is adequate cover during the school holidays. The Designated Safeguarding Lead (or any deputies) will be responsible for the academy's provision for internet safety, and for ensuring that the filtering and monitoring standards are met.

5.1.3. The name of the practitioner designated to take lead responsibility for safeguarding children in the EYFS (where appropriate).

5.1.4. The name of the nominated LAB 'link governor' leading on matters relating to safeguarding, as well as those for attendance and in supporting the academy fulfil the filtering and monitoring standards.

5.1.5. The names of staff with designated responsibilities for aspects of safeguarding including the Senior Mental Health Lead, the Educational Visits Coordinator and those responsible for attendance welfare. The appendix will also list the names of colleagues responsible for safeguarding pupils educated with off-site alternative providers and those for whom the academy provides alternatives on site.

5.1.6. Name the local authority Safeguarding Partnership.

5.1.7. Locally agreed inter-agency procedures put in place by the local authority Safeguarding Partnerships, including local protocols for the early help process, making referrals to the local authority, statutory assessment and the local authority threshold document. This will also include the local authority emergency arrangements in the event of lockdown procedures.

5.1.8. The name of the Designated Officer (formerly the LADO); this might be a team of officers.

5.1.9. Local children's social care provision.

5.1.10. Contact details and referral routes to relevant local authority departments such as Housing.

5.1.11. The designated teacher for Looked after Children, the local authority personal advisor for looked after children and the Virtual School Heads working in partnership with the academy.

5.1.12. Police contacts, such as those for Counter terrorism and FGM referrals.

5.1.13. External agencies with which the academy has a working partnership, including those supporting pupils with challenging behaviour or special educational needs.

5.1.14. Evidence of the registration vetting checks conducted by alternative providers and settings offering managed moves for pupils as well as the monitoring and evaluation routines required in ensuring the provision meets the needs of the child.

5.1.15. Training provision for staff including induction, annual refresher, routine updates as well as a focus on recognising particular risks such as online safety, child-on-child abuse and pupils' mental health concerns. Staff will be trained in how to fulfil their responsibilities for meeting the filtering and monitoring standards. All staff will be trained in the expectations of the staff safeguarding behaviour policy, the difference between concerns that reach the harms threshold and low-level concerns, and how to raise concerns with the Headteacher and the CEO.

5.1.16. Arrangements for working with the local authority safeguarding partnership in accordance with their procedures.

5.1.17. The safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.

5.1.18. The staff safeguarding behaviour policy (also referred to as the code of conduct) for staff specific to the academy.

5.1.19. Other safeguarding issues and matters of significance to the academy, including:

- the policy for restricting the use of mobile phones and portable cameras, particularly in the EYFS.

- arrangements for assessing and recording children's development in the EYFS, particularly when this involves posting images of children to an online portal such as Tapestry.

- contextual safeguarding such as the local risks to children of being drawn into criminal and sexual exploitation or into terrorism.

5.1.20. Academy procedures and systems including those for

- referring concerns about children at risk and children in need to the DSL.

- referring allegations and low-level concerns about a member of staff, volunteer, visitor, contractor or supply teacher to the Headteacher, and about the Headteacher to the CEO, as well as in managing concerns about an individual or organisation using the academy for non-academy premises.

- statutory duties such as reporting FGM to the police and CME to the relevant local authority as well as action required where staff have concerns about HBA and forced marriage.

- routinely updating staff about safeguarding issues relevant to the academy with guidance about actions or procedures in response to these concerns.

- the academy procedure when a child goes missing during the school day, either from the site or whist on an educational visit.

5.1.21. Child centric reporting and analysis of child-on-child abuse, bullying, attendance and physical intervention.

5.1.22. Curriculum arrangements for teaching children about safeguarding, including contextual safeguarding, online safety and relationships, sex and health education.

5.1.23. Supporting previously looked after children and care leavers as well as looked after children, including arrangements for working with the Virtual School Head and for promoting the educational achievement of looked after and previously looked after children.

5.1.24. Promoting pupils' attendance, mental health and wellbeing, health and safety and for educational trips and visits.

5.2. **Training and what all staff should know.**

5.2.1. All staff should be aware of the systems at the academy which support safeguarding, which will be explained as part of staff induction to include the following:

- The identity of the designated safeguarding leads, including any deputies, and their role in the academy.

- The Safeguarding and Child Protection policy.

- The academy Behaviour Policy.

- The staff Safeguarding Behaviour Policy contained in the academy safeguarding appendix.

- The safeguarding response to children who go missing in education.

- Part 1 of Keeping Children Safe in Education 2023.

5.2.2. Trust employees based at Head Office who do not work directly with children will read Part 1 Keeping Children Safe in Education 2023 as well as the PFS Safeguarding and Child Protection policy. A separate appendix to the PFS Safeguarding and Child Protection policy will be available for this core team. They will familiarise themselves with the relevant academy Safeguarding and Child Protection policy appendix before any academy visit.

5.2.3. Safeguarding training for staff, including online safety training, the roles and responsibilities for filtering and monitoring, will be integrated, aligned and considered as part of the whole academy safeguarding approach and wider staff training routines and curriculum planning. All staff will receive appropriate safeguarding and child protection training, which is regularly updated, at least annually. They will also receive sustained support, via email, e-bulletins and staff meetings, to ensure they have the relevant skills and knowledge to safeguard children effectively.

5.2.4. All staff will be prepared to identify children who may benefit from Early Help. Any child may benefit from Early Help, but staff will be alert to the potential needs of a child who:

- Is disabled or has specific additional needs

- Has special educational needs or an Education Health Care Plan

- Is a young carer

- Is showing signs of being drawn into anti-social or criminal behaviour

- Is frequently missing or who goes missing from care or from home

- Is at risk of modern slavery, trafficking or exploitation

- Is at risk of being radicalised or exploited

- Is at risk of becoming homeless

- Has a family member in prison

- Is in family circumstances presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

5.2.5. Staff will know how to make a referral to the DSL, be familiar with the procedures of the local authority safeguarding partners and expect to support workers and other agencies following any referral.

5.2.6. All staff will know what to do if a child tells them they are being abused or neglected. Staff should know how to maintain an appropriate level of confidentiality and only involve those who need to be involved such as the DSL, or deputy and children's social care. Staff will never promise a child that they will not tell anyone about a report of abuse, as this may not be in the best interests of the child.

5.2.7. All staff will be aware of the following indicators of abuse or neglect; they will understand that safeguarding issues are rarely standalone events and that multiple issues can overlap. All staff, and especially the DSLs and any deputies should be aware that children can also be vulnerable to multiple extra-familial risks. Staff should consult the academy Safeguarding and Child protection Policy appendix for the contextual safeguarding issues relevant to the academy's location and community.

- **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. 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 or 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 on 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 developmental 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, 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 or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, 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.

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

5.2.8. All staff will be aware that the following safeguarding issues can put children at risk of harm:

- **Child Criminal Exploitation (CCE)** Specific forms of CCE include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. 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, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. The experience of girls who are

criminally exploited can be very different to that of boys. The indicators may not be the same but both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

- **Child Sexual Exploitation (CSE):** CSE is a form of child sexual abuse. 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 images 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.

- **Child-on-child abuse** is most likely to include, but may not be limited to:
  o bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  o abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
  o physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
  o sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence) sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
  o 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
  o consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  o upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
  o initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

- **Sexual violence** refers to the sexual offences under the Sexual Offences Act 2003 and includes rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.

- **Sexual harassment** refers to 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. For the purposes of this policy, sexual harassment is referred to in the context of child-on-child sexual harassment. Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. 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. All staff at the Trust know that these behaviours can cross a line into sexual violence. For example, displaying pictures, photos or drawings of a sexual nature and upskirting (this is a criminal offence). Sexual harassment can include:

  o sexual comments, such as: telling sexual stories,

  o making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names o sexual "jokes" or taunting

  o physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes.

- **Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:**

  o consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of under eighteens is a criminal offence.

  o sharing of unwanted explicit content of sexualised online bullying or unwanted sexual comments and messages, including, on social media or sexual exploitation; coercion and threats, and

  o coercing others into sharing images of themselves or performing acts they're not comfortable with online.

- **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 these can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

- **Serious violence:** The range of risk factors which increase the likelihood of involvement in serious violence, include being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Indicators 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. All staff will be aware of the Academy Behaviour Policy and the procedures for dealing with serious violence.

- **Teenage relationship abuse:** Young people can experience domestic abuse within their own intimate relationships. This is a form of child-on-child 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), but the academy will support both young victims and young perpetrators where there are concerns about their safety or welfare.

- **Forced marriage:** Young people, especially girls, who are forced to marry, or those who fear they may be forced to marry, are frequently withdrawn from education, restricting their educational and personal development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally, often leading to depression and self-harm. These factors can contribute to impaired social development, limited career and educational opportunities, financial dependence and lifestyle restrictions.

  Staff will be alert to the signs that a child might be being coerced into forced marriage such as if they appear anxious, depressed and emotionally withdrawn with low self-esteem. They may show signs of mental health disorders and display behaviours such as self-harming, self-cutting or an eating disorder. Students may present with a sudden decline in their performance, aspirations or motivation, with some female pupils feeling that studying is pointless if they are going to be forced to marry and therefore be unable to continue with their education. High achieving pupils can also be at risk of forced marriage and there may have been no previous problems at school or concerns raised about the family. Staff should be alert to a sudden deterioration in the standard of pupils' homework as they might be completing it late at night to avoid detection. Staff should be alert if pupils frequently show up at school feeling lethargic, unable to concentrate and have a general appearance of tiredness. Pupils concerned about forced marriage may attend school but absent themselves from lessons and they may not be allowed to attend extra-curricular activities. Some pupils may show a decline in punctuality or stop attending the academy altogether.

  Staff may become aware of conflict between the pupil and their parents, particularly about whether the student will be allowed to continue their education. Another warning sign might be a family history of older siblings leaving education early and marrying early. Sometimes a pupil may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol. Often all these signs can be exacerbated in the periods leading up to holiday seasons so staff will be particularly vigilant during these times.

  Pupils who fear they may be forced to marry might come to the attention of, or turn to, a teacher or other member of staff before seeking help from the police or social services. Sometimes the pupil's friends report it to staff. All staff must be aware that they are in an ideal position to identify and respond to a victim's needs at an early stage. Staff will share these concerns with the DSL (or deputy)

immediately who will then refer the pupils to social services and the Forced Marriage Unit.

- **Female Genital Mutilation** If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. Any such concerns about FGM should be discussed with the DSL (or deputy).

- **Mental Health:** 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. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Any such concerns will be passed immediately to the DSL (or deputy) for further referral to appropriate specialist agencies.

- **Children who are absent from education:** All staff should be aware that children being absent from the academy, particularly repeatedly and/or for prolonged periods, and children missing education, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as 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 female genital mutilation, so- called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

- **Homelessness:** Being homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, as well as a referral to children's social care where a child has been harmed or is at risk of harm.

5.3. What staff should do if they have a concern about a child.

5.3.1. All staff at the Trust will be vigilant to the welfare of children and young people, and particularly to any changes in their behaviour and presentation. Staff will be aware that pupils 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.

Staff will also determine how best to build trusted relationships with children and young people which facilitate communication.

5.3.2.   Staff will use this professional curiosity in looking, listening, asking questions, checking out and reflecting on information they receive as well as being particularly alert to signs that a child might be experiencing harm or that they are victims of abuse. For example:

- Adults at the Trust know that all children and young people can be victims of exploitation and radicalisation, but they are aware that pupils with SEND as well as the children of families experiencing difficulties may be more vulnerable to exploitation. Signs that a child is the victim of CCE include deteriorating attendance, having new, older friendship groups and unexplained gifts and new possessions. Staff will be concerned that children who have physical injuries, show signs of self-harm and misuse drugs and alcohol, may be the victims of exploitation. Signs that a child is being radicalised include their increasing isolation, having a sudden disrespectful attitude to others and talking about key issues as if from a script.

- Adults will be alert to the signs that a child is the victim of online abuse which might include a sudden increase in the time they spend online, texting and gaming, or that they seem secretive, distant, upset or angry after using the internet. Staff might become aware that children or young people suddenly have more contact numbers and email addresses stored in their devices.

- Children who are being groomed or are victims of sexual abuse might talk of being in a relationship with an older person, become withdrawn, suddenly have money or new possessions, be involved in underage drinking or drug taking, use sexualised language or sexualised behaviour and spend more time away from home. Staff will be alert when a child or young person is frightened or shows signs of physical abuse. Designated safeguarding leaders will seek to create safe spaces where young people who are pregnant can disclose concerns about their welfare, including if they are a victim of abuse.

- Adults at the Trust are sensitive to children who may be victims of online bullying, reflecting on why a child or young person might suddenly not be doing well at school or is seeking to miss lessons or avoid areas of the academy. All members of the Trust are alert to the possibility that a child who harms another, such as through online bullying, may be a victim of bullying or abuse themselves.

- Signs that a younger child may be struggling with poor mental health might include them having excessive fears and worries, especially about things that have not worried them in the past, losing interest in their friends or previously favourite activities, loss of appetite or new difficulties concentrating. Older pupils struggling with their mental health may present in a similar way and their behaviour may deteriorate, they might attend less well, have low mood, be tearful and potentially show signs of self-harm.

5.3.3.   Concerns about a child might also be disclosed to adults at the Trust by pupils, parents or other members of the public. Those who disclose such information may do so with difficulty, having carefully chosen to whom they will speak. Accordingly, all

staff will handle disclosures sensitively. All staff will speak to the DSL (or deputy) immediately. Staff based at the academy will follow up by submitting the concerns in writing via the academy's referral system, typically a secure, electronic record keeping system such as Safeguard or CPOMS. Staff making a referral will obtain confirmation that the referral has been received by the DSL. Trust staff visiting the academy will provide the DSL with a written record of the disclosure in a sealed envelope which they will hand to the DSL in person. Where the DSL (or deputy) is not available, the member of staff will pass the concern to the Headteacher. All details will be shared with the DSL (or deputy) as soon as possible thereafter. The member of staff making the referral will follow up to ensure that the DSL (or deputy) has acted on behalf of the child.

- Staff taking a disclosure will listen to and take seriously any disclosure or information indicating that a child may be at risk of harm;

- not promise confidentiality at this stage as it is very likely a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps. Staff will only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

- recognise a child is likely to disclose to someone they trust: this could be anyone at the academy. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They will be supportive and respectful of the child;

- listen carefully to the child, be non-judgmental, be clear about boundaries and how the report will be progressed, not ask leading questions and only prompt the child where necessary with open questions – where, when, what, etc;

- consider the best way to make a record of the report, preferably waiting until the end of the report and immediately writing up a thorough summary which will be signed and dated (DD/MM/YYYY) including the time of the disclosure. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report, but it is essential that staff remain engaged with the child and not appear distracted by the note taking.

- only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker.

- where the report includes an online element, staff must not view or forward illegal images of a child.

- where possible, manage reports with two members of staff present, (preferably one of them being the DSL or a deputy) or informing the DSL (or deputy), as soon as practically possible thereafter.

5.3.5. The DSL (or deputy) will liaise with other agencies, including children's social care and the police where a crime has been committed. The DSL (or deputy) will comply with local authority procedures in making the referral, providing as much contextual information as possible and keeping a full record of all details and decisions made.

These records should be signed and dated (DD/MM/YYYY) and include the time each new record is added. Information will be shared with parents provided this will support the safeguarding and protection of the child. Within one working day of the referral being made, a local authority social worker should acknowledge receipt to the referrer and agree the next steps, including levels of protection or support required for the child as well as any statutory assessments. The DSL (or deputy) will follow up immediately if this acknowledgement is not forthcoming and keep the response under constant review and escalating the referral if the child's situation does not appear to be improving or is getting worse.

5.3.6.   The DSL (or deputy) will engage proactively with representatives from children's social care and other statutory safeguarding partners, playing an active role in advocating for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements in supporting individual children.

5.4.   Child-on-child sexual violence and sexual harassment.

5.4.1.   Child-on-child sexual violence and sexual harassment will not be tolerated at the Trust. Responding assertively to sexually inappropriate behaviour is an important intervention that helps prevent challenging, abusive and/or violent behaviour in the future.

5.4.2.   All reports will be taken seriously including those allegedly occurring at the academy, off site, online and irrespective of when the incident occurred. All members of the Trust understand that it can take time for a child to come forward to talk about these harms and that they must be sensitive to the trust placed in them when a child chooses to disclose. Children who are victims of sexual violence and sexual harassment may find the experience stressful and distressing. It is very likely to adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same academy. Staff will be trained to understand that some children are more susceptible to sexual violence and sexual harassment than others including girls and pupils with SEND. However, all reports of sexual violence or sexual harassment should be taken seriously, and the victims will be reassured that they are being taken seriously, that they will be supported and kept safe.

5.4.3.   All staff play an important role in preventing and responding where they believe a child may be at risk from child-on-child sexual violence or sexual harassment. Staff understand that all forms of behaviour such as grabbing bottoms, breasts or genitalia, or lifting up skirts may be criminal in nature. All staff adopt an attitude that even if there are no reports in the academy, it does not mean it is not happening and it may be the case that it is just not being reported. All staff will refer any concerns about child-on-child sexual violence or sexual harassment to the DSL immediately. Staff will always challenge inappropriate behaviours between children that are abusive in nature. Staff will not downplay certain behaviours, for example dismissing sexual harassment as "just having a laugh", "part of growing up" or "boys being boys". Staff will be trained to understand that this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

5.4.4. Staff taking a disclosure will follow the same approach as specified in 5.3.2. Each report will be managed on a case-by-case basis accounting for the following considerations. The DSL (or deputy) will refer the report of sexual violence to children's social care immediately. During this discussion it will be important to agree what should be disclosed to the victim's parents, provided that informing parents does not put the child at additional risk. Where a report of rape, assault by penetration or sexual assault is made, the DSL (or deputy) will refer this to the police. Where a report has been made to the police, the DSL (or deputy) will agree what information can be disclosed to the alleged perpetrator and their parents. Any discussion and subsequent decision will be recorded with these records signed and dated (DD/MM/YYYY) including the time the report was made. The DSL (or deputy) will keep the case under constant review to ensure an immediate response.

5.4.5. The DSL (or deputy) will make a thorough risk assessment determining the most appropriate course of action to protect the victim, the alleged perpetrator, and other children at the academy. The academy will provide additional support to any pupil witnesses, and do all it reasonably can to protect the anonymity of all children involved. The risk assessment should be recorded electronically and kept under routine review. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required, and these will inform the academy risk assessment. Initial considerations will include separating the victim and the alleged perpetrator to different classrooms, areas of the academy and means of transport to and from the academy. Any response will also take account of:

- the wishes of the victim such that they are involved in any decisions about the members of staff offering support, arrangements for a safe return to the academy and how any investigation will be progressed

- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour

- the ages of the children involved

- the developmental stages of the children involved

- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature, more confident or if the victim has a disability

- if the alleged incident is a one-off or a sustained pattern of abuse

- that sexual violence and sexual harassment can take place within intimate personal relationships between children

- importance of understanding intra familial harms and any necessary support for siblings following incidents

- are there ongoing risks to the victim, other children, adult students or academy staff, and

- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

5.4.6.   The academy will consider one of the following four outcomes to a report of sexual violence or sexual harassment:

- In some cases of sexual harassment, the DSL may take the view that it would be appropriate to manage the incident internally, such as when the children concerned are not in need of early help or that referrals to statutory services are not required. In these cases the DSL(or deputy) would provide pastoral support and use the behaviour policy as appropriate The DSL (or deputy) will keep such cases open and monitored for a month after the report at least.

- The DSL (or deputy) may decide to support the children involved by engaging with the local Early Help process. The DSL (or deputy) will work with statutory safeguarding partners to agree the assessments and specialist support required.

- If a referral is made, the DSL (or deputy) will work with local authority children's social care to protect all the children involved immediately and contribute to statutory assessments as required. The DSL (or deputy) will not wait for the start or the outcome of a local authority children's social care investigation before protecting the victim and other children at the academy. They will work closely with local authority children's social care (and other agencies as required) to ensure any actions the academy takes do not jeopardise a statutory investigation. In some cases, local authority children's social care will review the evidence and decide that a statutory intervention is not appropriate. The DSL will keep the case open and monitored and refer again if they believe the child remains in immediate danger or at risk of harm or if circumstances change. If a statutory assessment is not appropriate, the DSL (or a deputy) will offer other support such as early help, specialist support and pastoral support.

- Where a report of rape, assault by penetration or sexual assault is made, the DSL (or deputy) will pass this on to the police. If the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. Where a report has been made to the police, the academy will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They will also discuss the best way to protect the victim and their anonymity. At this stage, the academy will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the academy is supporting the child in any decision they take. This will be with the support of local authority children's social care and any appropriate specialist agencies.

- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. The DSL (and their deputies) will make themselves aware of their local arrangements. In some cases, it may become clear very quickly that the police will not take further action. In such circumstances, it is important that the academy continue to engage with specialist support for the victim and alleged perpetrator(s) as required. The DSL (or deputy) will keep the case open and monitored as required.

- Where bail is deemed appropriate, the DSL (or deputy) will work with children's social care and the police to ensure the victim can continue in their normal

routine, including going to the academy. It is rare for bail conditions to be applied and alleged perpetrators are more likely to be released under investigation. In these cases, the DSL (or deputy) will consult with the police and children's social care about how best to support the victim, the alleged perpetrator and other children, including potential witnesses. The DSL (or deputy) will amend the risk assessments to account for these developments and keep mitigations under routine review.

• If a child is convicted or receives a caution for a sexual offence, the DSL (or deputy) will update the risk assessment to ensure that appropriate protections are in place for all the children at the academy, including the perpetrator. If the perpetrator remains at the academy, the DSL (or deputy) will clarify with them and their parents and expectations or restrictions now they have been convicted or cautioned. The academy will take all reasonable steps to protect the victim and the perpetrator from bullying or harassment.

• Where the case is classified as 'no further action' or there is a not guilty verdict, the academy will offer support to the victim and alleged perpetrator for as long as necessary, taking full account of the vulnerabilities and unmet needs of the victim and the alleged perpetrator.

• All reports concerning sexual violence and sexual harassment will be recorded confidentially in the academy's secure safeguarding software. The DSL (or deputy) will be responsible for leading the investigation. Records will include the arrangements to support the victim, the review and amendment of risk assessments throughout the investigation and outcome arrangements, the support required for the alleged perpetrator as well as the records of any interaction with the safeguarding partnership and the children's parents or carers.

5.5. Children with special educational needs (SEN) and disabilities

5.5.1. Children with SEND can face additional safeguarding challenges. The DSL (or deputy) will work closely with the SENCO in each academy to address additional challenges faced by children with SEND as follows:

• assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration

• being more prone to peer group isolation than other children

    the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and

• communication barriers and difficulties in overcoming these barriers.

5.6. Safeguarding children in the Early Years Foundation Stage

5.6.1. All Trust staff must be alert to any issues of concern in the child's life at home or elsewhere. In addition to staff training regarding Trust and local authority policies and procedures, providers must train staff to identify signs of possible abuse or neglect at the earliest stage opportunity including:

• Significant changes in children's behaviour

- Deterioration in children's well being

- Unexplained bruising or signs of possible neglect

- Children's comments which give cause for concern

- Any reason to suspect neglect or abuse outside the setting, such as signs that a girl may have been subject to female genital mutilation

- Inappropriate behaviour demonstrated by other members of staff in the setting such as excessive 1:1 attention or sharing inappropriate images.

5.6.2.   The Trust is also committed to fulfilling the key requirements of the Early Years statutory framework as follows:

- Staff must not be under the influence of alcohol or any other substance which may affect their ability to care for children. All staff medication on academy premises must be stored securely and out of children's reach

- All staff must follow the Trust's policy for administering medication and informing parents of any accidents, illnesses, injuries or treatment the child has received during the school day

- At least one member of staff with a current paediatric first aid certificate must be on the premises and available at all times when the children are present

- Each child must be assigned a key person who must ensure that the child's care is tailored to meet their needs

- EYFS staff must ensure that all children are adequately supervised and that they are always in adults' sight and hearing

- Reception classes are subject to class size legislation which limits the size of the class to 30 children per teacher

- Staff will undertake daily risk assessments to ensure the children are not being exposed to risk and that they are taking steps to manage any risks that exist. Staff must keep children safe on educational visits by assessing and managing the potential risks and hazards. This assessment must include the adult ratios.

- No member of staff will give corporal punishment to a child

- Staff must keep a record of where it has been necessary to use physical intervention to avert immediate danger or personal injury to a child or where it has been absolutely necessary to manage the child's behaviour.

5.7.   **Pupils who are lesbian, gay, bi or trans (LGBT)**

5.7.1.   All staff at the Trust understand the fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, but they are alert to the risk that these children can be targeted by others. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Each academy will ensure that it provides safe spaces where children who are LGBT can share their concerns. Safeguarding staff will work with

children who are LGBT in understanding the adults the child trusts and how to make these staff available to support the child.

5.8. Pupils' mental health

5.8.1. Each academy will develop its own academy-wide approach to promoting pupils' positive mental health and wellbeing. Through this strategy, the Senior Mental Health lead will seek to normalise mental health issues, raise awareness of how and where pupils can access support and develop emotional literacy and resilience to help pupils to explain, understand and find ways to manage their emotions and mental health.

5.8.2. Staff training will prepare staff in identifying pupils with mental health needs as well as more formal means such as through the analysis of pupil records for attainment, behaviour and attendance. Staff will also be aware that pupils' mental health needs can emerge through the admissions process, through mental health professionals or through children referring themselves to a trusted adult. Academies will engage other agencies in supporting these pupils such as educational psychological support, counselling services and recommended therapies such as art and music therapy. Academies will maintain a dedicated space where all pupils have access to calming or specialist provision.

5.8.3. Staff at each academy will be alert to the changes in a child's behaviour that might be indicative of low mood and depression, i.e. when low mood continues for longer than two weeks. Staff will pass on to the DSL (or deputy) any factors that might affect a child's mental health, such as bereavement, and they will be aware that key events such as starting a new school can affect children's mental health. DSLs (or deputies) will always work with health professionals in raising concerns about a child's low mood over time.

5.8.4. Staff will be alert to visible signs that children may be self-harming such as unexplained accidents or injuries, covering up or avoiding situations where they have to change clothing as well as concealing sharp items. Staff will never actively search for signs of injury.

5.8.5. Staff know that all children are at risk of suicide ideation as well as the risk factors associated with it such as alcohol and drug misuse, sexuality, physical and sexual abuse, family breakdown and school problems including bullying and exam pressure.

5.9. Pupils attending alternative provision

5.9.1. The academy will take responsibility for the safeguarding of a child placed in alternative provision. In order to satisfy themselves that the provider meets the needs of the pupil, the academy will obtain written confirmation of the provider's registration status as well as written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the academy would otherwise perform in respect of its own staff. Academy staff will ascertain the child's attendance daily and routinely monitor (such as every two weeks) the extent to which the education and care programme is meeting the agreed objectives.

Safeguarding and Child Protection Policy

5.10. Attendance: children missing from education and elective home education

5.10.1. Good attendance is essential for pupil wellbeing. For the most vulnerable pupils, regular attendance is also an important protective factor and the best opportunity for any needs to be identified and for them to receive support. All members of the Trust know that the foundation to good attendance is a calm, orderly, safe and supportive environment, where pupils want to attend and where they can thrive.

5.10.2. All academies consistently promote the benefits of good attendance, setting high expectations for every pupil, communicating those expectations clearly and consistently to pupils and parents, systematically analysing their data to identify patterns to target their improvement efforts, and working effectively with the local authority and other local partners to overcome barriers to attendance. The academy will hold more than one emergency contact for each pupil to provide additional options for contacting a responsible adult. The academy will inform the local authority when a pupil is removed from the school roll at standard and non-standard transition points.

5.10.3. In promoting good attendance, all academies will:

- Maintain a whole school culture that promotes the benefits of high attendance

- Implement a clear school attendance policy which all staff, pupils and parents understand. Accurately complete admission and attendance registers

- Have effective day to day processes in place to follow-up absence including safe and routine home visit protocols

- Regularly monitor and analyse attendance and absence data to identify pupils or cohorts that require support with their attendance and put effective strategies in place.

- Build strong relationships with families, listen to and understand barriers to attendance and work with families to remove them, particularly for children living through ACEs

- Share information and work collaboratively with other schools in the area, local authorities, and other partners when absence is at risk of becoming persistent or severe.

5.10.4. All staff will be aware that children being absent from the academy, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as 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 female genital mutilation, so- called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff will be made aware of their academy's unauthorised absence procedures and children missing education procedures.

Safeguarding and Child Protection Policy

5.10.5. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the academy will liaise with other key professionals to meet with parents/carers where possible. This should be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

5.11. **Pupil wellbeing and behaviour**

5.11.1. All academies consistently and fairly promote high standards of behaviour for all pupils, rewarding good behaviour and providing additional support where needed. Each academy Behaviour Policy includes a range of possible sanctions, which have been clearly communicated to and understood by pupils, staff, and parents. All members of the Trust know that taking disciplinary action and providing appropriate support are not mutually exclusive actions. They can and should occur at the same time if necessary.

5.11.2. Each academy will consider whether any misbehaviour gives cause to suspect that a pupil is suffering, or is likely to suffer, harm. Where this may be the case staff will speak to the DSL (or deputy). Staff at all academies know that living with ACEs can also affect children's social and emotional development which might manifest in their presentation and behaviour. The DSL (or deputy) will consider if pastoral support, an early help intervention or a referral to children's social care is appropriate. The academy will also consider whether any reasonable adjustments need to be made to the sanction in response to any disability the pupil may have. It is also important for the schools to seek to try and understand the underlying causes of behaviour and whether additional support is needed.

5.12. **Searching, screening and confiscation**

5.12.1. The Headteacher will oversee the academy's practice of searching to ensure that a culture of safe, proportionate and appropriate searching is maintained, which safeguards the welfare of all pupils and staff with support from the DSL (or deputy). The Headteacher should ensure that a sufficient number of staff are appropriately trained in how to lawfully and safely search a pupil who is not co-operating, so that these trained staff can support and advise other members of staff if this situation arises. However, it is vital that all staff understand their rights and the rights of the pupil who is being searched. The DSL (or deputy) should be informed of any searching incidents where the member of staff had reasonable grounds to suspect a pupil was in possession of a prohibited item. The staff member should also involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

5.13. **What staff should do if they have safeguarding concerns about another staff member.**

5.13.1. Safeguarding concerns include those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the academy. Allegations will be considered from two perspectives – the first is those allegations that meet the harm threshold as follows: i.e. anyone working in the academy who 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 they 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.

5.13.2. If staff have safeguarding concerns, or an allegation is made about another member of staff, including supply staff, volunteers, tradespeople and visitors, this will be referred to the Headteacher. This includes behaviour, which may have occurred outside the academy, that poses a transferable risk to children at the academy. Where there are concerns of this nature about the Headteacher, they will be referred to the CEO of the Trust. Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police. Where the academy is not the employer of an individual, such as a supply teacher or volunteer, the Headteacher will ensure allegations are dealt with appropriately, including liaising with relevant parties. Allegations concerning a member of the Trust core team visiting the academy will be referred to the Headteacher.

5.13.3. It is essential that any allegation is managed quickly, led by a case manager, who will be the Headteacher concerning an allegation about a member of academy staff, volunteer or supply teacher, and the CEO where the allegation concerns a Headteacher. The Director of HR and the Head of Safeguarding will nominate the case manager when the allegation concerns a member of the Trust core team visiting the academy. The case manager will establish the basic facts such as whether the individual was in the academy at the time of the allegation, if the individual came into contact with a child and the extent to which there were witnesses or CCTV footage relevant to the allegation. The case manager will not pursue their enquiries to avoid jeopardising any future police investigation. Where the case manager believes the allegation meets the harm threshold, or if they are in any doubt that the concern meets the harm threshold, they will contact the LADO on the same day ensuring that the LADO has the full details of the person against whom a concern has been raised. The purpose of the initial discussion with the LADO is to consider the nature, content and context of the allegation and to agree a course of action. This will include whether it is necessary to suspend the person about whom the concern has been raised. If appropriate, the case manager will inform children's social care and the police. The case manager will discuss with the LADO other risks such as any posed to children in the adult's family or in the local community as well as the transferable risk of any behaviours occurring outside the academy. The case manager will maintain a risk assessment to mitigate for these risks. The Trust will ensure confidentiality while an allegation is being considered and investigated.

5.13.4. The parents of the child or children concerned should be informed of the allegation as soon as possible if they do not already know of it. They will be made aware of the requirement to maintain confidentiality. Where a strategy discussion is required, the case manager will agree first with the police or children's social care what information can be disclosed to parents and carers. Parents and carers should be kept informed of the progress of the case and the outcome although the details in reaching a decision would not normally be disclosed to parents.

5.13.5. The case manager will agree with the LADO when to inform the person against whom an allegation has been made. Some allegations will be so serious they require immediate intervention by children's social care and/or the police. A strategy discussion will be needed, if there is cause to suspect a child is suffering or likely to suffer significant harm. In any of these three circumstances, the case manager will not inform the person about whom the allegation has been made until the agencies have been consulted and they have agreed what information can be disclosed to the accused. The case manager should inform the Director of HR or the Head of Safeguarding at the Trust as soon as an allegation has been passed to the LADO in order that the colleague about whom the concern has been raised, receives appropriate support. The case manager will provide anyone facing an allegation with a named contact if they are suspended. The person facing an allegation may wish to contact their professional association.

5.13.6. Where the allegation concerns a supply teacher, the Headteacher will establish the basic facts such as whether the individual was in the academy at the time of the allegation, if the individual came into contact with a child and the extent to which there were witnesses or CCTV footage relevant to the allegation. The case manager will not pursue their enquiries to avoid jeopardising any future police investigation. Where the case manager believes the allegation meets the harm threshold, or if they are in any doubt that the concern meets the harm threshold, they will contact the LADO on the same day. The academy will not decide to cease to use a supply teacher due to safeguarding concerns, without liaising with the LADO to determine arrangements for investigating the allegation. The Trust will discuss with the agency whether it is appropriate to suspend the supply teacher, or deploy them to another part of the academy whilst they carry out
their investigation. The supply teacher should be encouraged to contact their trade union representative if they have one, or a colleague for support.

5.13.7. When using a supply agency, the HR department will inform the agency of its process for managing allegations. This should include inviting the agency's HR Manager to meetings and keeping them up to date about policies.

5.13.8. Where it is necessary for further enquiries to be made, the LADO and the case manager will agree how and by whom the investigation should be undertaken. The following definitions will be used with 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;

- 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;

- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

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5.13.9. The case manager will discuss the allegation outcomes with the Trust before determining a course of action. This might include taking no further action, dismissal or deciding not to use the person's services in the future. The Trust will refer to the DBS any person in regulated activity who has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. Failure to refer is a criminal offence. Where appropriate, the Trust will refer the matter to the TRA to consider prohibiting the individual from teaching.

5.13.10. The case manager will keep a full and contemporaneous record of details of the allegation, including the following information;

- a clear and comprehensive summary of the allegation

- details of how the allegation was followed up and resolved, including all guidance received from the LADO

- a note of any action taken, decisions reached in agreement with the LADO as well as the outcome

- 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.

5.13.11. Each entry will be signed and dated (DD/MM/YYYY) including the time the record was made. These records will be held securely by the Headteacher.

5.13.12. The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. In such cases, the decision and a justification for it should be recorded by both the case manager and the LADO and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.

5.13.13. The second type of concern is a low-level concern. The Trust's policy on low-level concerns is founded on its commitment to creating and embedding a culture of openness, trust and transparency. The values and expected behaviour of all staff will be set out in the staff behaviour policy and this will should be lived, monitored and reinforced constantly by all staff. Staff behaviour towards a child that is inconsistent with the staff safeguarding behaviour policy such that it causes unease or a nagging doubt but that does not meet the threshold for harm will be treated as a low-level concern. 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 devices

- 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.

5.13.14. Staff must distinguish expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others. All staff should feel able to share low-level concerns and do so responsibly and promptly with the Headteacher. Concerns about a member of staff, volunteer or visitor will be referred to the Headteacher who will deal with the concern appropriately, recording the incident, decision making rationale and actions taken. Where the Headteacher is in any doubt about the action to take when dealing with a low-level concern, they will consult with the LADO. Low-level concerns about a member of the Trust core team visiting the academy will be passed by the Headteacher to the Head of Safeguarding. Low level concerns regarding supply staff, contractors or tradespeople will be passed to their employers.

5.13.15. The Headteacher will handle and respond to such concerns sensitively and proportionately when they are raised and address unprofessional behaviour and support the individual to correct it at an early stage. They will routinely analyse records to identify any weakness in the academy safeguarding system.

5.13.16. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else. 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 consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

5.13.17. Should an academy receive an allegation relating to an incident that happened when an individual or organisation was using their academy premises for the purposes of running activities for children it will follow its safeguarding policies and procedures, including informing the LADO.

5.14. **What staff should do if they have concerns about safeguarding practices at the academy**

5.14.1. All staff, volunteers and supply teachers should feel able to raise concerns about poor and unsafe practice that compromise the academy's safeguarding regime. All such concerns will be taken seriously by the academy leadership team.

5.14.2. The person raising the concern should do so with their line manager. This may be done verbally or in writing. They have the right to have the matter treated confidentially. If the line manager believes the concern to be genuine and that it is appropriate to use the Whistleblowing procedure, the manager will contact the Headteacher or CEO who will assess the concern. Should the allegation be against the Headteacher or CEO, the Trust's HR Director will be contacted to assess the concern. If the person raising the concern feels unable to speak with their line manager in the first instance, they may contact the Trust's HR Director directly. In circumstances where the individual wishes to remain anonymous, a confidential email can be sent to concerns@pfschools.co.uk . It is critical that all the necessary information be provided in order to fully investigate the matter.

5.14.3. Where staff feel unable to raise a concern with the Trust, the Trust will ensure that all staff have access to other agencies such as the NSPCC.

5.15. **Safeguarding in the curriculum**

5.15.1. Academies will ensure that children are taught about safeguarding, including helping children to understand the contextual risks local to the academy. Other relevant issues will be covered through the Relationship Education, Relationships and Sex Education and Health Education programme as set out in the academy RSE policy and to include the following themes:

- Bullying/Cyberbullying

- Diversity issues e.g. Forced Marriage, FGM, Honour Based Abuse

- Domestic violence / Relationships, Drug, alcohol and substance abuse

- With reference to Teaching online safety in school (June 2019) pupils will be taught:

  - How to evaluate what they see online
  - How to recognise techniques used for persuasion
  - Online behaviour
  - How to identify online risks
  - How and when to seek support
  - Understanding the risks associated with harmful online challenges and hoaxes

- Extremism/Radicalisation Protective Behaviours

- Sexual Exploitation of Children (CSE) and Sexting

- Promoting healthy and respectful relationships, consent and understanding harmful sexual behaviour.

- Health education.

5.15.2. Academies will enhance the safeguarding curriculum by drawing on information and resources provided by external organisations. Before visiting speakers are invited to the academy, the leadership, including the DSL, will conduct an assessment of the education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.

Online safety

5.15.3 Children will be safeguarded from potentially harmful and inappropriate online material. The academy will implement an academy wide approach to online safety that protects and educates pupils and staff in their use of technology. This approach will include a coordinated strategy integrating the following provision: the Welfare and PSHE curriculum, transition, the DSL, the mental health lead, pastoral and wellbeing teams, the intervention programme, as well as training for staff and a full support programme for parents and carers. It will establish mechanisms to identify, intervene in, and escalate any concerns where appropriate, particularly in routinely capturing the voice of the child as well as when they are in need.

5.15.4 The breadth of issues classified within online safety can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, harmful online challenges and online hoaxes, fake news, racism, misogyny, selfharm, suicide, anti-Semitism, radicalisation and extremism.

- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- conduct: personal online behaviour that increases the likelihood of, or causes, harm; 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; and

- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

5.15.5 Staff relationships and associations outside the academy, including online, which may have an implication for the safeguarding of children, such as membership of a community sports club attended by pupils at the school, will be shared with the Headteacher where the member of staff works in an academy and with the relevant director for core team members of the Trust where the employee is a member of the core team.

5.16   **Filtering and monitoring**

5.16.1 Academies have a responsibility to protect and educate pupils in their use of technology. As part of a comprehensive approach to online safety, the Trust will limit pupils' exposure to risks through the IT system by having appropriate filters in place, taking care not to over block material that helps children understand how to use the internet safely. Staff will be trained in actively maintaining the filtering system whilst not restricting pupils' access to the curriculum. The welfare curriculum will support pupils in understanding how to manage risks themselves

5.16.2 The monitoring strategy will be managed by members of the IT team and the DSL (or deputy). A variety of monitoring techniques may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users

- live supervision by staff on a console with device management software

- network monitoring using log files of internet traffic and web access

- individual device monitoring through software or third-party services

5.16.3 Monitoring will pick up incidents urgently, usually through alerts or observations which

will be passed to the DSL (or deputy) allowing for prompt action. The outcome of all such actions will be recorded and reported to the Trustees and to the respective LAB who will support the academy in reviewing the effectiveness of filtering and monitoring, including in the speed of response to incidents.

5.16.4 Most children are using data on their phones, on 3G, 4G and 5G networks. The Trust's Acceptable Use Policy and the Acceptable Use Agreement (for all staff, governors, visitors and pupils) are inclusive of both fixed and mobile internet; technologies provided by the Trust (such as PCs, laptops, tablets, webcams, whiteboards, voting systems, digital video equipment, etc.); and technologies owned by pupils and staff, but brought onto Trust premises (such as laptops, mobile phones, camera phones, PDAs and portable media players, etc.) The academy will also ensure children know how to access the internet safely when learning from home.

5.17 Safer recruitment

5.17.1 The Trust will take all steps to prevent those who pose a risk of harm from working with children. Recruitment procedures will ensure rigour in identifying and rejecting people who might abuse children.

5.17.2 The Trust expects all employees to promote the welfare of children and includes this commitment to safeguarding in the advertisement for any vacancy. Adverts will stipulate the extent to which the role involves contact with children and whether the post holder will be engaging in regulated activity. Information provided to applicants will remind them that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children. It will detail the safeguarding responsibilities of the post as per the job description and person specification, whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974 as well as details of the requirements for the role. Applicants will be required to engage with the Trust's online recruitment process which includes the application form. Curriculum vitae will not be considered.

5.17.3 Shortlisting will be carried out by at least two employees. This process will include an analysis of the extent to which the candidates fulfil the requirements of the role, look for gaps in employment and explore potential concerns. A member of staff independent of the hiring manager will carry out an online search as part of the due diligence of shortlisted candidates. Shortlisted candidates will be informed that these searches are being carried out. They will also be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

5.17.4 The academy will ensure that at least one member of the interview panel for all appointments has been trained in safer recruitment. Interviews will explore potential areas of concern and determine the applicant's suitability to work with children. Interviewees will be alert to areas that may be concerning and will probe further if there is any

- implication that adults and children are equal

- lack of recognition and/or understanding of the vulnerability of children

- inappropriate idealisation of children

- inadequate understanding of appropriate boundaries between adults and children, and,

- indication of negative safeguarding behaviours.

5.17.5 As most staff will be employed in regulated activity, an enhanced DBS with barring will be required for most appointments as well as checks for any prohibition. Members of staff who are appointed to carry out teaching work will require an additional vetting check to ensure they are not prohibited from teaching. Checks on those engaged in management roles are required to ensure they are not prohibited under section 128 provisions. For all staff who do not have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS will be appropriate. This includes supervised volunteers and contractors.

5.17.6 The Trust will also verify identity, academic or vocational qualifications and the applicant's right to work in the UK. They will obtain at least two professional references, one of which must be from the applicant's current employer. The Trust will ensure that the information confirms that the referee is satisfied with the applicant's suitability to work with children and provide the facts of any safeguarding concerns or allegations that meet the harm threshold. Open testimonials will not be accepted, nor any information provided by the candidate without verifying the information. Electronic references will be vetted to ensure they originate from a credible source. The Trust will check previous employment history, account for any gaps in employment, make any further checks if the person has lived or worked outside the UK and ensure themselves the candidate has the health and physical capacity for the job. The Trust will undertake the relevant checks when existing staff and volunteers apply for a new position in the Trust. Further details are available in the PFS Recruitment policy.

5.17.7 Disqualification under the childcare act applies to all staff engaged to provide early years care as well as later years care for children under 8 years of age. Adults are disqualified from childcare if they are included on the DBS Barred List, if they have been refused registration or had it cancelled or if they have been found to have committed an overseas offence. Disqualification 'by association' applies where childcare is provided in domestic settings.

5.17.8 Academies will implement their own procedures to ensure visitors to academy premises are always supervised.

5.18 The Prevent Duty

5.18.1 The Trust has full regard for the Prevent Duty complying with the four general themes for prioritising this issue: risk assessment, working in partnership, staff training and IT policies.

5.18.2 The signs of radicalisation are not always obvious. Staff will be alert to changes in a child's behaviour that might indicate they need protection. These could include:

- Isolating themselves from family and friends

- Talking as if from a scripted speech

- Unwillingness or inability to discuss their views

- A sudden disrespectful attitude to others

- Increased levels of anger

- Increased secretiveness, especially around internet use

5.18.3 Staff should use their judgement in identifying children who may be at risk of radicalisation including those who have low self-esteem, or be victims of bullying or discrimination. All concerns will be passed to the DSL (or deputy) with any further Prevent referrals to the local authority made in accordance with their procedures. Prevent referrals may be made to a multiagency Channel panel which will determine the level of support required. A representative from the academy will be prepared to attend this panel and contribute in support of the child.

5.18.4 The Trust's systems for filtering and monitoring will be aligned to the academy Prevent risk assessment in accordance with the Prevent Duty.

5.19 Reasonable force

5.19.1 There are circumstances when it is appropriate for academy staff to use reasonable force to safeguard children and young people. Staff will use their professional judgement when making decisions on whether or not to use reasonable force to control or restrain a child depending on individual circumstances. Staff will consider the additional risks presented by incidents involving children with SEN or disabilities or with medical conditions, and consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

5.19.2 The DSL (or deputy) will work with pastoral leaders to reduce the occurrence of challenging behaviour and the need to use reasonable force by implementing positive and proactive behaviour support mechanisms, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers.

5.20 Extended academy activities

5.20.1 Where the Trust provides services or activities directly under the supervision or management of academy staff, the Trust's arrangements for child protection will apply. Where services or activities are provided separately by another body, including through the National Tutoring Programme, the Trust will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and that there are arrangements to liaise with the academy on these matters where appropriate.

5.20.2 The academy leaders have a responsibility for safeguarding visiting pupils staying in the homes of children at the academy, such as in hosting an exchange visit. Academies must now conduct enhanced DBS checks on all family members in the house over the age of 16 since they are considered volunteers in regulated activity for the duration of the stay.

5.20.3 The Trust recognises that where academies arrange care and accommodation for exchange visits, the parents will fulfil the criteria for regulated activity, because they are caring for nonfamily members between the hours of 2am and 6am. The academy must obtain a DBS enhanced certificate with Barred List information on each of the carers in the household as well as anyone over the age of 16.

5.20.4 Work experience provides a number of benefits for children. It can help with their development and also help them choose their vocation for later life. For pupils to get the most out of this experience it is essential that the Trust and the employers work together to ensure the pupils' safety and wellbeing. The academy will ensure that the placement provider has policies and procedures in place to protect children from harm. Barred list checks via the DBS will be required on people who supervise a child under the age of 16 on a work experience placement and where the child is provided with teaching / training /instruction / supervision by an unsupervised person at the placement for more three days in a 30 day period, or overnight.

6.   Record keeping

6.1.   Clear and comprehensive details of each concern, with all subsequent action, decisions and outcomes will be recorded electronically. They will be kept confidential, and stored securely and separately, accessible only by those authorised to do so from the safeguarding leaders. Records will include a robust chronology, relevant internal and external information with respect to the academy contextual safeguarding risk assessment incorporated in the academy safeguarding and child protection appendix. Meeting notes and reports, Child Protection plans and other legal documents will be uploaded to the electronic system. The DSL will monitor records on a routine basis to assure the quality of each entry and to ensure that they represent an accurate case history.

6.2.   Pupil information, such as that concerning pupil attendance, behaviour, first aid treatment and achievement will be monitored and analysed routinely in order to identify children who may need protection or support. Other records, including the records of sexual harassment and sexual violence, including online, will be routinely analysed to identify patterns and intervene early to prevent abuse.

Curriculum assessments will be routinely monitored paying particular attention to the educational achievement of looked after and previously looked after children, as well as all children with a social worker to identify and intervene in promoting their outcomes.

6.3.   The Trust will retain records evidencing compliance with this policy, as set out in the Trust's Records Retention Policy.

7.   Roles and Responsibilities

7.1.   **Headteachers** are responsible for ensuring that all staff, including volunteers and supply staff, adhere to this policy and the associated policies cited in this document in establishing a coordinated and robust safeguarding culture. They will ensure that all staff comply in creating a safe environment in which children can thrive and learn. The Headteacher will ensure that the DSL (and deputy) are given the time, funding, resources and support to fulfil their role, especially in advising staff and participating in statutory assessments and strategy discussions.

7.2.   **Designated safeguarding lead (DSL)**

7.2.1.   Every academy will have a DSL with appropriate status and authority to take a lead on safeguarding strategy, policy implementation and practice. The academy will decide how many deputy designated leads are appointed; the DSL and any deputies, should have a complete safeguarding picture and be the most

appropriate people to take practical steps to advise on the response to safeguarding concerns. Details of their role and responsibilities must be incorporated in the colleagues' job descriptions and include the following aspects:

Manage referrals:

- refer cases of suspected abuse to the local authority children's social care

- support staff who make referrals to local authority children's social care

- refer cases to the Channel programme where there is a radicalisation concern

- support staff who make referrals to the Channel programme

- work with the Director of HR to refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service and

- refer cases where a crime may have been committed to the police

Work with others:

- act as a point of contact with the three local authority safeguarding partners;

- liaise with the Headteacher, informing them of the ongoing management of child protection cases and police investigations

- as required, liaise with the case manager and the LADO in cases which concern a staff member

- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs, and Senior Mental Health Leads) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies; and

- act as a source of support, advice and expertise for all staff.

Training:

- The DSL (and any deputies) will undergo local authority safeguarding partnership training at least every two years, as well as undertaking Prevent awareness training, to provide them with the knowledge and skills required to carry out their role and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so

- ensure each member of staff has access to, and understands, the academy's child protection policy and procedures, especially new and part time staff

- are alert to the specific needs of children in need, those with special educational needs and young carers

- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the GDPR.

- understand the importance of information sharing, both within the academy, and with the three safeguarding partners, other agencies, organisations and practitioners

- are able to keep detailed, accurate, secure written records of concerns and referrals

- understand and support the academy with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation

- are able to 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 the academy

- 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 SEND children 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 academy may put in place to protect them.

Raising awareness:

- ensure the academy's child protection policies are known, understood and used appropriately

- work with the Trust to review policy procedures and implementation at least annually

- ensure the Child Protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the academy in this; and 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.

- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and the academy leadership. This will include ensuring all staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the

challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

7.2.2. **Child protection file:** Where children leave the academy (including for in-year transfers) the DSL will ensure their child protection file is transferred to the new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt will be obtained. In addition to the child protection file, the DSL will also share any relevant information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

7.2.3. **Availability:** During term time the DSL (or a deputy) will always be available (during school hours) for staff in the academy to discuss any safeguarding concerns. The academy will also ensure the DSL (or deputy) provide adequate and appropriate cover arrangements for any out of hours/out of term activities.

7.2.4. **Supervision for DSLs:** The Trust ensures that DSLs and other staff who work directly and regularly with children whose safety and welfare are at risk receive regular supervision. The purpose of this support is intended to ensure staff have the professional capacity to focus on the interests of the children, the quality of practice, the effectiveness of partnership working and the emotional impact of the role with any resulting stress.

8. Quality Assurance and Reporting

8.1. **Quality assurance framework:** The Trust is committed to maintaining high standards in safeguarding practice by the implementation of robust quality assurance processes. The Deputy CEO will operate a layered approach to monitoring quality and taking clear action steps to improve safeguarding in the following ways:

8.1.1. Conducting annual academy audits of safeguarding practice in each academy and using findings to create an action plan for development.

8.1.2. Monitoring the level of need throughout the Trust, capturing information about vulnerable pupils, those open to service, patterns in referrals and reports of child-on-child abuse, as well as allegations about the suitability of adults in academies at regular intervals each term. This information will be used to draw up a risk assessment deploying the central safeguarding team in accordance with a consideration of this information as well as other contextual challenges such as changes in safeguarding leadership and local incidents.

8.1.3. Providing sustained support in training, supervision and case management. The colleague from the central safeguarding team will also act as an advocate in fostering and improving relationships with local safeguarding partners and in ensuring the academy has rigorous provision in mitigating for contextual risks to the pupils at the academy.

8.1.4. The Head of Safeguarding will maintain a central resource of specialist guidance for all academy DSLs and communicate monthly with them outlining expectations and routine activities to secure good practice.

8.1.5. The Director of Governance and the Deputy CEO will collaborate in creating guidance for all LAB safeguarding representatives, and the Head of Safeguarding will train this group routinely throughout the year to reinforce these principles of effective support and challenge.

8.1.6. The Trust Board will review policy and provision in meeting statutory requirements in all areas of safeguarding including Child Protection, Health and Safety, HR, vetting and recruitment as well as in its consideration of pupils with protected characteristics three times a year

8.1.7. The Central team will commission an external auditor to review annually the level of compliance in policy implementation for key safeguarding activities such as preparing and running Educational Trips and Visits and in Safer Recruitment.

8.2. **Reporting:** DSLs will report to the Deputy CEO throughout the year. Safeguarding will always be discussed when the academy LAB meets. The reporting process will include a full consideration of the information available within the academy about indicators of harm such as behaviour, bullying, attendance and first aid, with emerging patterns and the strategic response to any trends.8.2.1. The Head of Safeguarding will report to the Trustees via the Education Committee outlining the level of need in the Trust, an analysis of risks and complaints, the strategic response to any trends and the developments emerging through the Safeguarding Board and updates in statutory guidance.

8.2.2. The Head of Safeguarding will retain a record of allegations about adults including those that meet the harm threshold passed to the respective LADO as well as low-level concerns. These concerns will be analysed with trend information shared with the Trustees. Emerging patters in the breaches of the staff safeguarding behaviour policy will be addressed through training; the safeguarding behaviour policy will be amended to enhance guidance and expectations for staff.

9. Consequences of Non-Compliance

9.1. Non-compliance will be managed through the Trust disciplinary procedures, including involving the Police, the DBS and the TRA as required.

10. Policy Status

10.1. This policy does not form part of any employee's contract employment.

11. Related Policies

11.1. This policy is related to the following other Trust policies:

- Behaviour
- Anti-Bullying (including Cyberbullying)
- Special Educational Needs
- Alternative provision procedures
- Child-on-child abuse
- Supporting transgender pupils
- Educational trips and Visits

- Procedures for First aid and the administration of medicines
- Supporting pupils with medical conditions
- Intimate care
- Health and Safety
- Relationships Education, and Relationships and Sex Education, and Health Education
- Equal Opportunities
- Acceptable Use Policy
- Social media policy
- Mobile phone policy
- Intimate care policy
- Recruitment policy

Safeguarding and Child Protection Policy