

Little Way Catholic  
Educational Trust

# Safeguarding and Child Protection Policy

The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and visitors to share the same commitment. We follow Gloucestershire Safeguarding Children Partnership. For more information go to <https://www.gloucestershire.gov.uk/gscp/>

This policy must be read in conjunction with the Safeguarding Incorporating Child Protection Policy and the Equal Opportunities Policy.

This policy must be read in conjunction with all the policies listed on [Page 34](#).

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## 1. Introduction

Safeguarding, and promoting the welfare of children, is the highest priority for all LWCET schools. It is essential and everybody’s duty to know and understand their roles and responsibilities in safeguarding. The Trust’s Safeguarding Policy and school practice, follows the Keeping Children Safe in Education September 2023 document [www.gov.uk/government/publications/keeping-children-safe-in-education](http://www.gov.uk/government/publications/keeping-children-safe-in-education) and is read alongside:

- Statutory guidance Working Together to Safeguard Children;
- Departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners;
- Departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges.

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (KCSIE) 2023 and the Ofsted Inspecting Safeguarding in Early years, Education and Skills Settings as:

- Protecting children from maltreatment;
- Preventing the impairment of children’s mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes;
- The KCSIE document is influenced by the Ofsted Review of Sexual Abuse in Schools and Colleges document.

‘Children’ includes everyone under the age of 18.

The Trust and Local Governance Committee (LGC) recognise that children have a fundamental right to be protected from maltreatment, harm or exploitation and that pupils cannot learn effectively unless they feel safe and secure. The Trust Board and LGC will, therefore, provide a school environment, which promotes well-being including self-esteem and a feeling of worth. Pupil concerns will be listened to and acted upon. Each school’s approach is child-centred and each school will consider, at all times, what is in the best interest of the child.

Local Governance Committees, staff and volunteers in each school understand the importance of working in partnership with children, their parents/carers and other agencies in order to safeguard and promote children's welfare.

The Local Governance Committees will also ensure that schools carry out their statutory duties to report suspected child abuse or neglect to the Local Authority Children's Services (Social Care) "Gloucestershire Safeguarding Children Partnership – GSCP" and to assist them in taking appropriate action on behalf of children in need or enquiring into allegations of child abuse or neglect. Our schools recognise the contribution they can make to protect and support pupils in their care and contribute to a co-ordinated offer of Early Help.

All LWCET schools are committed to ensuring that best practice is adopted when working with all children and young people, offering them support and protection and accepts that it has a legal and moral responsibility to implement procedures, to provide a duty of care for young people, to safeguard their well-being and to protect them from abuse.

## 2. Aims

The purpose of this policy is to:

- Provide safeguarding and child protection for our pupils with a "child-centred approach", within the Trust's systems and practice;
- Enable staff and volunteers to safeguard and promote the welfare of children;
- Promote a whole school culture and approach, which makes the school a safe place to learn.

All LWCET schools will aim to:

- Raise the awareness of all school staff of the importance of child protection and safeguarding pupils and of their responsibilities for identifying and reporting actual or suspected abuse, neglect or concerns about a child's welfare.
- Ensure that where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Put systems in place that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. These will include: GHLL and other questionnaires, pupil voice, 'Time to Talk' requests and worry boxes in class.
- Ensure that child welfare is of paramount importance and that there is a common belief throughout the setting that all children have the right to be protected from abuse and neglect leading to a zero-tolerance approach to abuse.
- Make pupils and parents aware that LWCET schools take safeguarding seriously and will follow the appropriate procedures for identifying and reporting abuse, neglect or concerns about a child's welfare and for dealing with allegations against staff.
- Ensure that all employees and volunteers receive safeguarding training appropriate to their designation. This is to ensure all staff are aware of the signs and symptoms of abuse and neglect, how to identify children who may benefit from early help, and raise awareness of the wide range of safeguarding issues and how to help to respond and support the children in their care.
- Be a supportive staff, building positive, professional relationships, so that children who are being abused, neglected or at risk of harm (they may only tell people they trust and with whom they feel safe) can talk and disclose evidence of abuse or raises other concerns about their welfare, with staff following up procedures in an appropriate way.
- Ensure that staff's own practice and behaviour puts children's welfare first, cannot be misconstrued in any way, and does not contravene accepted good practice; Staff conduct, whistleblowing and expectations of teaching staff's roles and responsibilities will be followed from LA and DfE guidance.
- Make all staff and volunteers aware that they should report any concerns about safeguarding practice or any concerns about staff to the Head Teacher (or Chair of Governors if concern is regarding the Head Teacher) or to the Local Authority LADO.
- Promote effective liaison with other agencies in order to work together for the protection of all pupils.
- Support pupils' development in ways that will foster security, confidence and independence.

- Establish and maintain an environment where children feel safe and secure, are encouraged to talk, are listened to and their concerns followed up.
- Have an open mindset that 'it could happen to our pupils' and 'it could happen here'.
- Listen; provide support and signpost parents/families to any support they may need.
- Integrate a safeguarding curriculum within the existing curriculum allowing for continuity and progress through all key stages – teaching the children how to keep safe and be good citizens; extra support may be given from the Pastoral Support Team.
- Understand that even if it is not reported that pupils should still be taught safeguarding and child protection measures, and that this may need a personalised approach rather than a "one size fits all" approach.
- Take account of and inform policy in related areas such as bullying, staff and pupil behaviour policies and E-Safety.
- Work with multi agencies and allow access to social care to conduct assessments and other LA officers to carry out safeguarding functions e.g. investigate allegations.
- Challenge social care and any other agencies where needed.
- Ensure that, where a pupil on the child protection register leaves, their information is transferred to their new school immediately with permission from social care and that the child's social worker is informed.

There are three main elements to the Trust's Safeguarding Policy:

- **PREVENTION** - (positive and safe school and Trust environment, careful and vigilant teaching, accessible pastoral care, support to pupils, good adult role models).
- **PROTECTION** - (agreed procedures are followed, staff are trained and supported to respond appropriately and sensitively to safeguarding concerns).
- **SUPPORT** - (to pupils, who may have been at risk of significant harm and the way staff respond to their concerns and any work that may be required).

LWCET schools do not operate in isolation. Safeguarding is the responsibility of all adults and especially those working or volunteering with children. The LWCET schools aim to help protect the children in its care by working consistently and appropriately with all agencies to reduce risk and promote the welfare of children. All professionals work within the same child protection/safeguarding procedures.

Child Protection refers to the processes undertaken to meet statutory obligations laid out in the Children's Act 1989 & The Children's Act 2004.

Each school fully recognises its responsibilities and the importance of Child Protection and Safeguarding - 'Always act in the interests of the child':

It is the responsibility of each LWCET school to:

- Safeguard and promote the welfare of children.
- Ensure we practice safer recruitment in checking the suitability of staff and volunteers to work with children.
- Raise awareness of safeguarding issues and equip children with the skills needed to keep them safe.
- Develop and then implement procedures for identifying and reporting cases or suspected cases, of abuse.
- Support pupils who have been abused in accordance with his/her agreed Child Protection Plan.
- Establish a safe environment in which children can learn and develop.

### 3. Equality statement

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

We give special consideration to children who:

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

## 4. Roles and Responsibilities

We have a child-centred and coordinated approach to safeguarding

LWCET schools and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance: Working Together to Safeguard Children.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by the Trust's Behaviour Policy and pastoral support system. This policy applies to all staff, volunteers and Local Governance Committees in LWCET schools and is consistent with the procedures of our three safeguarding partners. The LWCET policy and procedures also apply to extended school and off-site activities.

### Safeguarding Partners

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

- The local authority (LA)
- An integrated care board for an area within the LA
- The chief officer of police for a police area in the LA area

Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- Healthy and respectful relationships (across school)
- Boundaries and consent (from EYFS)
- Stereotyping, prejudice and equality

- Body confidence and self-esteem ('Safe in my Body' lessons)
- How to recognise an abusive relationship (and how relationships should be equal)

## MAPPA and MARAC

### MAPPA - Multi Agency Public Protection Arrangements

Occasionally an educational setting may need to be involved in the assessment and management of a high-risk offender. The multi-agency public protection arrangements ensure the assessment and management of offenders who are required to register as convicted sex offenders, violent offenders who receive a prison sentence of 12 months or more, and other offenders who are assessed as posing a high risk of serious harm. The assessment of serious harm includes risk to: children, known adults, public, staff, self. The police, probation and prison service are the lead agencies, with other agencies including CYP/Education settings, having a statutory duty to cooperate. Multi-agency meetings are convened to share relevant information and produce a plan on how the identified risks can be managed. These meetings are similar in format to child protection conferences; however, the offender will not always be aware that the meetings are taking place and will not be invited to attend. The multi-agency public protection arrangements are overseen by a Strategic Management Board. Membership includes the Lead for Child Protection from CYP.

### MARAC Multi Agency Risk Assessment Conference

Meetings are held in Gloucestershire fortnightly to discuss high-level incidences of domestic abuse. The purpose of MARACs are to share information to increase the safety, health and well-being of victims - adults and their children, to construct jointly and implement a risk management plan that provides professional support to all those at risk and that reduces the risk of harm. We may be notified by other agencies if there are concerns of domestic violence.

#### 4.1 LWCET Staff

All LWCET staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration by the end of September in each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All LWCET staff will be aware of:

- LWCET systems which support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the acceptable user policy, which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of

being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection
- Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

#### 4.2 The Designated Safeguarding Lead (DSL)

LWCET schools will follow the procedures set out by the Local (Gloucestershire) Safeguarding Children Partnership (GSCP) and take account of guidance issued by the Department for Education.

The Designated Safeguarding Lead for each school should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

Each school's Designated Safeguarding Lead (DSL) can be found at the front of this document. The DSLs have received appropriate training and support for this role. However, the Head Teacher may delegate responsibility for making safeguarding referrals, following up referrals or attending meetings to other suitably qualified leaders in the school, as well as the SENDCo or a member of the Pastoral Team. The Designated Safeguarding Lead (DSL) has a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and working with a range of other agencies.

The full responsibilities of the DSL and Deputies are set out in their job description.

#### Managing Referrals

The Designated Safeguarding Lead in each LWCET school is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

#### Working with Others

The Designated Safeguarding Lead in each LWCET school is expected to:

- Liaise with the Head Teacher or principal to inform them of issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENDCO) on matters of safety and safeguarding (including online and digital safety) 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 Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.



The Designated Safeguarding Lead should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role 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 school'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;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school 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 can recognise the additional risks that children with SEN 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 school may put in place to protect them.
- Keep children safe whilst they are online at school;

#### Raise Awareness

The Designated Safeguarding Lead in each LWCET school should:

- Ensure the Trust and school Child Protection Policies are known, understood and used appropriately;
- Contribute to the annual review of the Trust's Child Protection Policy and ensure procedures and implementation are updated and reviewed regularly, and work with Local Governing Committees regarding this;
- 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 school in this; and link with the GSCP to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

#### Child Protection File and Information Sharing

Child Protection files are stored in confidential and locked areas in each LWCET school, only accessible to those members of staff who need access. These contain referrals and child protection records. The Trust use CPOMS and MyConcern as internal systems to communicate confidential information. These systems have a two-step log in system for additional security. The systems are used for immediate communication to keep staff up to date with children's particular needs and circumstances.

The Designated Safeguarding Lead for each school is responsible for raising the awareness of information sharing with teachers and leaders about the welfare, safeguarding and child protection matters in each school, so that everyone can better understand the child's needs to support them.

Where children leave the school, the individual school will ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as

Designated Safeguarding Leads and SENDCOs or the named person with oversight for SEND in colleges, are aware as required.

Each LWCET school will forward and receive CPOMS/MyConcern child files with schools who also use the system, for continuity and sharing of chronological records.

In addition to the child protection file, the Designated Safeguarding Lead for each LWCET School should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

Each LWCET school asks parents on admission to school, for permissions around sharing information with other agencies and explain that due to Child Protection, LWCET schools may have to share information without their consent.

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.

Please refer to the LWCET GDPR Policy, highlighting the Data Protection Officer for the Trust and the LWCET's GDPR Practice and Procedures.

Further details on information sharing can be found:

- In Chapter One of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing
- At Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful
- At The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department
- In the Data Protection Toolkit for Schools - Guidance to support schools with data protection activity, including compliance with the GDPR.

Records will be kept of incidents and disclosures and be acted upon by each LWCET school, according to KCSIE if events are found to be unsubstantiated, unfounded, false or malicious reports, considering whether the person making the allegation did so as a cry for help, or whether disciplinary action (in line with the Trust's Behaviour Policy) is indicated.

#### Record Keeping and Serious Case Reviews

It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Further information about serious case reviews can be found in Chapter four of Working Together to Safeguard Children. Examples of poor practice include:

- Failing to act on and refer the early signs of abuse and neglect;
- Poor record keeping;
- Failing to listen to the views of the child;
- Failing to re-assess concerns when situations do not improve;
- Not sharing information with the right people within and between agencies;
- Sharing information too slowly; and
- A lack of challenge to those who appear not to be taking action

## Availability

At LWCET schools during term time, the Designated Safeguarding Lead (or a Deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking, the Designated Safeguarding Lead (or Deputy) would be expected to be available in person, there may be occasions where the Designated Safeguarding Lead, in exceptional circumstances, may be available via phone, video conference or other such media is acceptable.

All LWCET staff may contact safeguarding staff in any of the Trust schools for advice and support if required, to enable capacity to be increased, for example in the event of staff illness or a large-scale safeguarding incident.

It is a matter for individual schools and the Designated Safeguarding Lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### 4.3 The Head Teacher

The Head Teacher is responsible for the implementation of this policy, including ensuring that staff (including temporary staff) and volunteers:

- Are informed of the systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Have had adequate safeguarding and child protection training including online safety training
- Communicating this policy to parents/carers when their child joins the school via the school website
- Ensuring that the DSL and member of staff responsible for looked after children has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with another DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting

### 4.4 The Local Governing Committee

The Local Governing Committee will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure all safeguarding practice is compliant with legislation (including obligations under the Human Rights Act 1998, the Equality Act 2010 and Public Sector Equality Duty), reporting to the Safeguarding Governor on a regular basis and escalating matters to the appropriate authority, as appropriate, including to the school's local multi-agency safeguarding arrangements
- Ensure the Single Central Record is maintained for individual LWCET schools
- Appoint a link governor to monitor the outworking of this policy in conjunction with the Local Governance Committee and respond to any Trust-wide consultation on policy and practice.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes making sure that the leadership team and staff are aware of the provisions in place, that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure that:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- Ensure that at least one person involved in any school-based recruitment process has undergone safer recruitment training
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

All LGC governors will read Keeping Children Safe in Education in its entirety. This policy has further information on how governors are supported to fulfil their role.

4.5 The Trust Board will:

- Adopt a Trust-wide safeguarding and child protection policy
- Appoint a designated Director for Safeguarding
- Consult with each LGC with regard to reviewing all policies relating to Safeguarding and Child Protection
- Ensure the Single Central Record is maintained for all centrally appointed staff
- Monitor safeguarding practice (ensuring compliance with legislation) across the Trust through appropriate safeguarding audits/checks, escalating specific issues to the safeguarding Director and policy matters to the Board and monitoring trends
- Ensure that at least one person involved in any central staff recruitment process has undergone safer recruitment training
- Resource and facilitate identified safeguarding priorities across the Trust
- Adopt a Trust-wide Policy for Educational Visits

## 5. Types of Abuse

We recognise that because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. As a school, we are aware that safeguarding and child protection issues could arise at any time and we aim to be vigilant, act promptly as well as prevent issues through our curriculum, nurturing environment and well-trained staff.

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

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

As described in the “Keeping Children Safe in Education” – Statutory Guidance for September 2023, the types of abuse and neglect are listed below:

## Abuse and Neglect

All staff should be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect, and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that staff are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding lead, or deputy.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with their designated safeguarding lead.

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

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. In all cases, if staff are unsure, they should always speak to the Designated Safeguarding Lead (or Deputy).

## 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 causing 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 as far 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 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 (also known as child-on-child abuse) in education and all staff should be aware of it and of their school policy and procedures for dealing with it.

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

## Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into: Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing nudes and semi-nude images and videos. Taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

## Child Criminal Exploitation (CCE)

Some specific forms of CCE can 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. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that 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 non-penetrative 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

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. All staff should understand that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their Designated Safeguarding Lead.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" 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.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos also known as sexting or youth produced sexual imagery;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- 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).

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

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

- You must record the allegation and tell the DSL, but do not investigate it

- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

All information will be logged on CPOMS and any children involved will be reviewed to understand what pastoral support may be required, understanding that perceived perpetrators will often need pastoral support to understand their unmet needs as well as perceived victims and onlookers.

### Female Genital Mutilation (FGM)

Whilst all staff should speak to the Designated Safeguarding Lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. 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.

### County Lines Guidance

County lines is a form of criminal exploitation. It is when criminals befriend children, either online or offline and then manipulate them into drug dealing. The 'lines' refer to mobile phones that are used to control a young person who is delivering drugs, often to towns outside their own county.

Young people aged 14-17 are most likely to be targeted by criminal groups but there are reports of seven year olds being groomed into county lines.

Primary school children are seen as easy targets because they are less likely to get caught. The grooming might start with them being asked to 'keep watch' but it soon escalates to them being forced to stash weapons, money or become drug couriers.

### Preventing Radicalisation

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

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

**Terrorism** - is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the



potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour. The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong. If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

### Sharing of nudes and semi-nudes

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. Children includes everyone under the age of 18.

### Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of [domestic abuse](#) and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to national crime agency human-trafficking, domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass operates in Gloucestershire and in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. The Act's provisions, including the new definition, will be commenced over the coming months.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.

#### Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (KCSIE see paragraphs 33-35). All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults.

#### Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

All staff should be aware of the associated risks and understand the measures in place to manage these. If staff have a concern about a pupil with relation to Serious Violence or County Lines this should be recorded and given to the Designated Safeguarding Lead. The DSL will then refer any concerns to Social Care. The Police may also be contacted depending on the nature of the incident or concern. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

#### 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse 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. Schools can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the Child Protection Policy, and speaking to the Designated Safeguarding Lead or a Deputy DSL.

## 6. Recognising abuse and taking action

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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

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

If a child makes a disclosure to you

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

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

Bear in mind that some children may:

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

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

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly, you must tell the DSL as soon as possible. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome.

The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

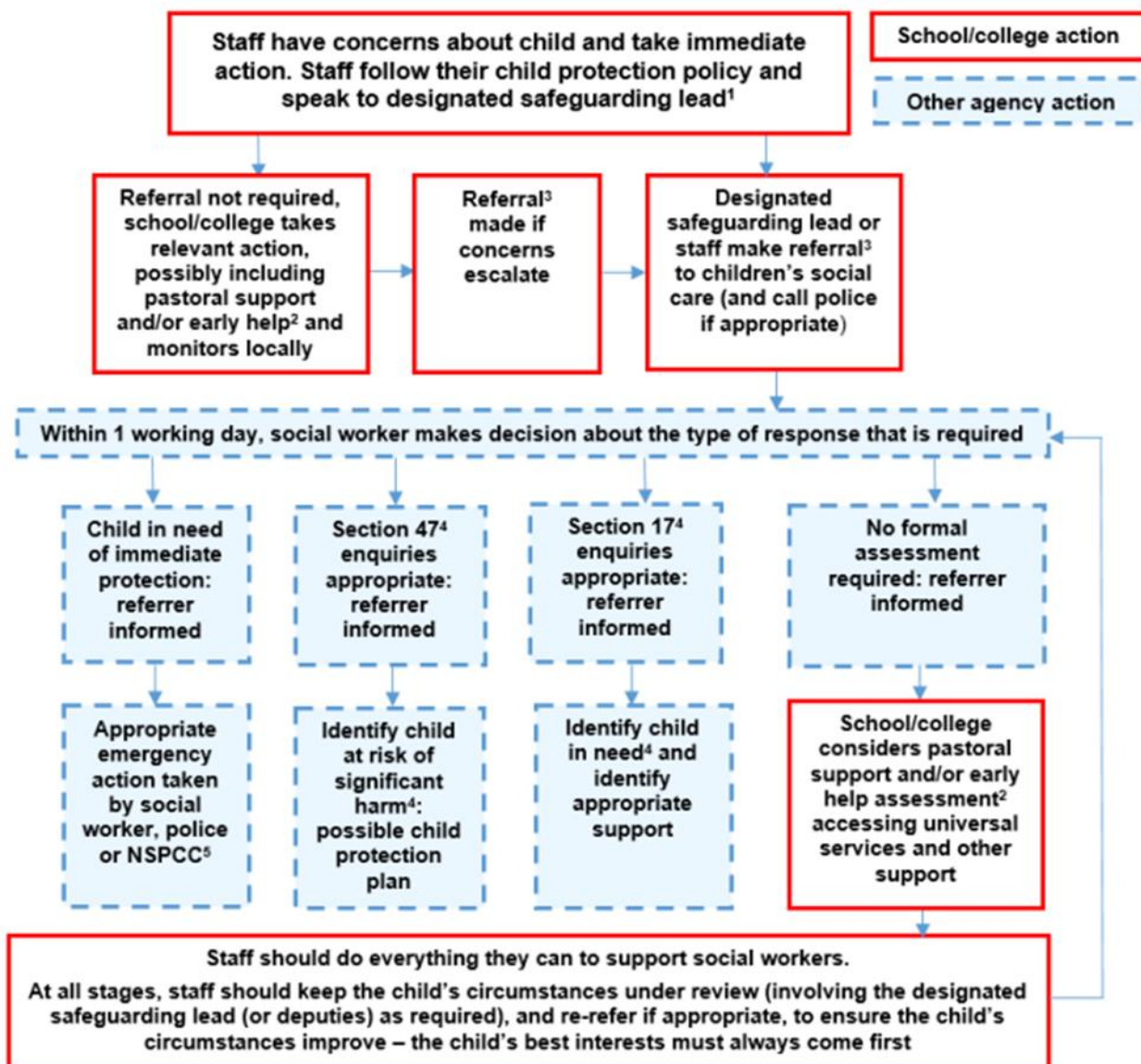
If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. Local procedures for referrals can be found here:

<https://www.gloucestershire.gov.uk/media/2106284/child-protection-process-flowchart-nov-2021.pdf>

The Gloucestershire County Council website sets out the child protection referral processes and also all of the relevant forms (<https://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/report-a-child-at-risk/>).

Further guidance can be found on the Gloucestershire Safeguarding Children's Partnership website ([https://www.proceduresonline.com/swcpp/gloucestershire/p\\_report\\_concerns.html](https://www.proceduresonline.com/swcpp/gloucestershire/p_report_concerns.html)). Keeping Children Safe in Education (KCSIE, 2023) also provides clear guidance (see flow-chart below):

## Actions where there are concerns about a child



Action following a report of sexual violence and/or sexual harassment

What to consider:

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. School should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of school. The Designated Safeguarding Lead (or a Deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school.

Important considerations will include the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children and the nature of the alleged incident(s), including:

- Whether a crime may have been committed and/or whether HSB has been displayed.
  - The ages of the children involved
  - The developmental stages of the children involved
  - Any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing?
  - If the victim have a disability or learning difficulty
  - If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
  - That sexual violence and sexual harassment can take place within intimate personal relationships between children
  - The importance of understanding intra familial harms and any necessary support for siblings following incidents are there ongoing risks to the victim, other children, or school staff, and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

## County Lines Guidance

All staff should immediately report any concerns to the DSL and later ask for a follow up on actions and responses. The DSL will assess case by case and notify the relevant authorities of the incident. A risk assessment will be considered, written and actioned where needed to safeguard all.

The Teaching Staff and the Pastoral Support Team may be asked to do direct work with pupils (victim and perpetrator) as a result of any incidents.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. School staff can access government guidance on the various aspects of child protection, as required via GOV.UK and other government websites.

## Sharing of nudes and semi-nudes Guidance

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

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

Initial review meeting

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

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

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

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

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate). If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done via the linked Schoolbeat officer or by ringing 101.

Guidance for if you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk.

Any adult who is informed by a girl under 18 that an act of FGM has been carried out on her; or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth; must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures. The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Guidance for if you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children’s social care. Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

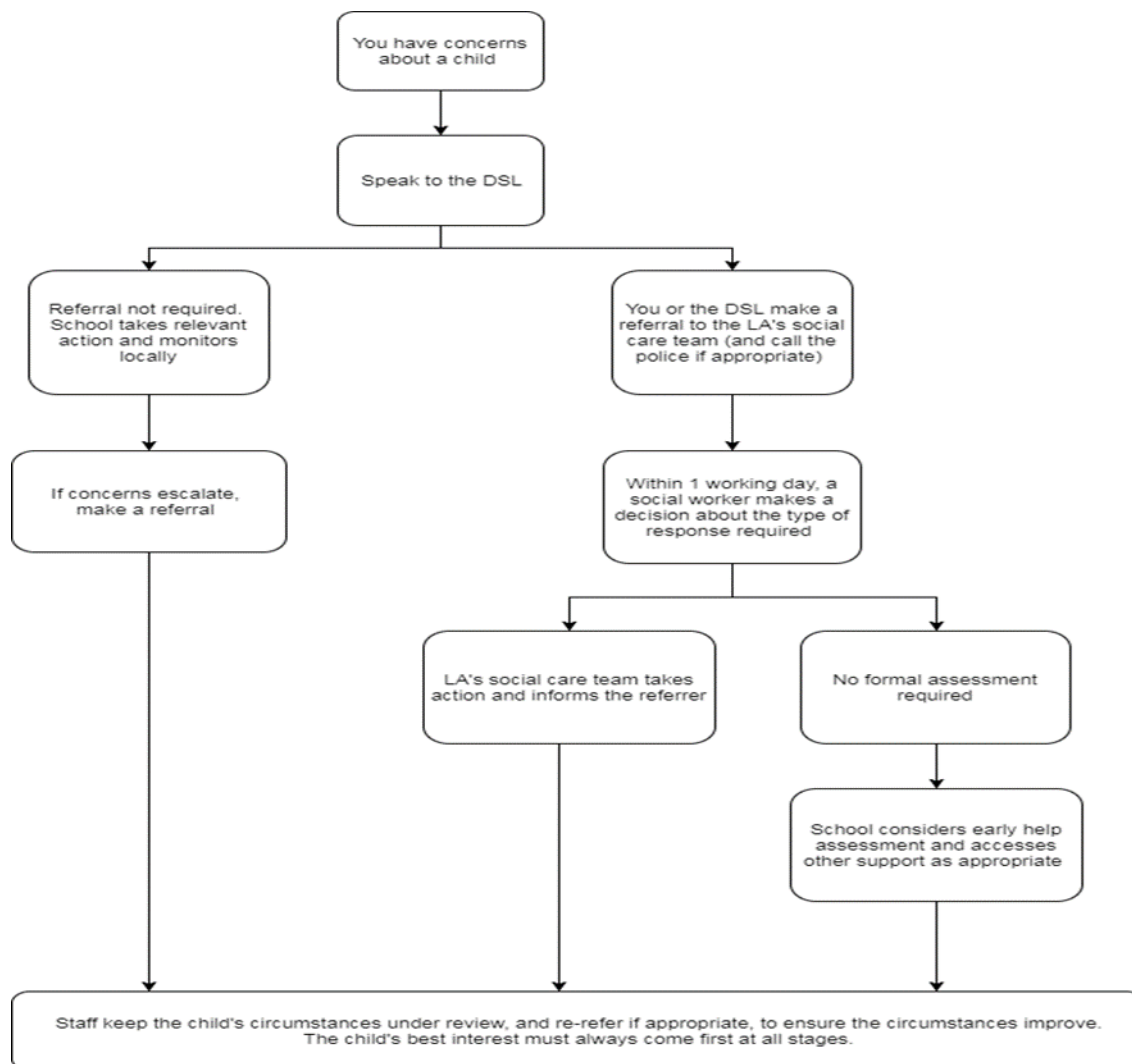
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

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

If you believe that the child is not in immediate danger, a log on CPOMS should be made which copies in the Safeguarding Team. Where possible, speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL via CPOMS as soon as practically possible. A referral can be made to local authority children’s social care directly, if appropriate (see ‘Referral’ below). Share any action taken with the DSL via CPOMS as soon as possible.





## 7. Reporting Systems for our Pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

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

We do this by:

- Doing daily check ins with children as they enter school and acting upon what they tell us about how they're feeling
- Being very clear about who children should speak to if they're worried about something or need help from an adult with work or their feelings
- Checking that all children know the name of people they can share worries with and where they will find them
- 'I wish my teacher knew' activities interspersed through the curriculum and opportunities to reflect such as circle time, oracy time and prayer bears
- Talking openly about emotions, doing regular check ins with whole class, small groups and individual children
- Having allocated emotionally available adults for children and especially those with vulnerabilities or protected characteristics
- Following up on any concerns away from other children taking leads from what a child has said, written, drawn, been observed doing
- Spending time at the start of a school year to build strong relationships between a teaching team and their children to help build trusting relationships where open and honest conversation is encouraged, respected and accepted
- Training all staff and volunteers on what to do in the case of a disclosure and the reassurances that they should provide and ensuring everyone is aware that 'it could happen here'.

## 8. Pupil Support

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school, their behaviour may be challenging and defiant or they may be withdrawn.

The school will endeavour to support the pupil through:

- The content of the curriculum.
- The school ethos, which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- The school's Behaviour Policy, which is aimed at supporting all pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- The school's Pastoral Support Team who will give children individual support with behavioural, emotional and social difficulties, including 'keeping safe'.
- We will assess their mental health needs and the school's TALC lead - Team Around the Locality (TALC) - will submit any referrals or funding requests.

Liaison with other agencies that support the pupil such as Social Care, CYPS, Education Welfare and Educational Psychology Service. We will be proactive in this, making sure that we keep other agencies informed and follow up referrals we have made and contribute to any plans with clear actions and outcomes.

Children potentially at greater risk of harm

Children who need a social worker (Child in Need and Child Protection Plans). Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the Designated Safeguarding Lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

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

#### Looked-after and previously looked-after children

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

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

Each LWCET school have appointed a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

#### Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about responding to unauthorised absence or missing education where there are known safeguarding risks and the provision of pastoral and/or academic support

#### Special Educational Needs

Governors recognise that children with special educational needs or disabilities may be especially vulnerable to abuse and expect staff to take extra care to interpret correctly apparent signs of abuse or neglect. Indications of abuse will be reported as they are for other pupils. They may be increasingly vulnerable to being bullied, at higher risk of sexual exploitation, online grooming and radicalisation. Staff should work closely with parents/carers in meeting any particular needs and providing any appropriate safeguarding advice.

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Our Child Protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's

condition. Without further exploration, these children could be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. There is also the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

There may also be communication barriers and difficulties in managing or reporting these challenges. SEND pupils may lack the cognitive understanding to be able to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

Governors will provide a school environment in which pupils with special educational needs or disabilities feel confident and able to discuss their concerns. Whenever possible, pupils will be given the chance to express themselves to a member of staff with appropriate communication skills. The Designated Safeguarding Lead will work with the Special Educational Needs Co-ordinator (SENDCo) to identify pupils with particular communication needs.

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND in school. Schools should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Further information can be found in the department's:

- SEND Code of Practice 0 to 25 years, and
- Supporting Pupils at School with Medical Conditions. And from specialist organisations such as:
- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS) – SENDIASS offers information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service ([councilfordisabledchildren.org.uk](http://councilfordisabledchildren.org.uk))
- Mencap – Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

Children requiring Mental Health Support

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

Children who are Lesbian, Gay, Bi, or Trans (LGBTQ+)

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to counter homophobic, biphobic and transphobic bullying and abuse.

Elective Home Education (EHE)

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. At St Thomas More Catholic Primary School, we ensure that the intention to electively home educate is discussed with the parent/carer, ensuring that the child's best interests are fully considered. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. We request a letter of the parent/carers decision and inform the Local Authority immediately of their intentions.

DfE guidance for local authorities on [Elective Home Education](#) sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. Although this is primarily aimed at LAs, schools should also be familiar with this guidance.

## 9. Notifying Parents or Carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

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

## 10. Confidentiality

The Trust approach to data protection is detailed in the Data Protection and Retention Policy which can be found on our website. With respect to sharing safeguarding information within our school and with the three safeguarding partners and other agencies as required, we work within the following principles:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There’s no definitive answer, because even if a victim doesn’t consent to sharing information, staff may still lawfully share it if there’s another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim’s wishes against their duty to protect the victim and other children
    - The DSL should consider that:
      - Parents or carers should normally be informed (unless this would put the victim at greater risk)
      - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children’s social care
      - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
        - Regarding anonymity, all staff will:
          - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
          - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
          - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims’ identities
            - The government’s information sharing advice for safeguarding practitioners includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information
            - If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
            - Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

## 11. Curriculum including Online Safety

Personal, Social and Health Education is taught in school, during PSHCE, as well as Spiritual, Moral, Social and Cultural (SMSC) development and British Fundamental Values (BFV) to ensure that children learn how to be good citizens and about other people’s cultures and beliefs. We aim for the children to learn life-skills, how to keep themselves and each other safe. We plan these areas of the curriculum into our assemblies to teach whole school issues e.g. Fire and road safety; E-safety; Pants rule etc. Other areas of the curriculum such as Relationships and Sex Education (RSE) are also important parts of our “keep safe” work, as well as educating the children about family life and choices. See KCSIE for a range of resources to support this work.

Our staff are trained in online safety and all LWCET schools welcome outside visitors such as the police to help teach about keeping safe online. We are aware that it is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole Trust and school approach to online safety empowers a school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

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

- Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

In LWCET schools, we want to teach children how to keep themselves safe, as well as being responsible and respectful online themselves. Curriculum links to online safety are found in the PSHCE and Computing curriculums. See Annex D of KCSIE for useful resources to support online safety in schools.

Staff recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and through training and support are confident they have the capability to support children with SEND to stay safe online.

### Filtering and monitoring

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, Local Governance Committees should be doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, Local Governance Committees should ensure their school has appropriate filtering and monitoring systems in place and regularly review their effectiveness.

Each LGC should ensure that the Leadership Team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively, and know how to escalate concerns when identified. Local Governance Committees should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

Each school has filters and monitoring systems in place to limit the risk of children accessing or seeing inappropriate materials. Children are not allowed phones in school and must hand these in to teachers at the start of the day to be locked away. Phones are used for safeguarding purposes for pupils walking to and from school, at their parent/carer's discretion.

Each school has a page on their website relating to remote home learning, referring children and families to resources and other websites with information about how to keep safe online.

The school will be in regular contact with parents and carers to make them aware of what their children are being asked to do online including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

## 12. Cybercrime

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

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

## 13. Educational Visits

Teachers will use the GCC risk assessments to record Educational Visit risk assessments before the trip. Residential risk assessments will be sent to the SHE department at GCC as per the Local Authority guidance. Children will not go on the trip if their behaviour is deemed to be unsafe to themselves or others. If this is the case, parents/carers will be notified and children will remain at school to be educated. With reference to travel any volunteers or minibus use will be risk assessed against the GCC expectations and Health and Safety policy (e.g. driving license, MOT, insurance and MIDAS checks).

## 14. Health & Safety

The Head Teacher of each LWCET school is responsible for ensuring that Health and Safety procedures are in place and this is overseen by the Local Governance Committee. The Local Authority complete a compliance and a Health and Safety audit annually. It is all staff's responsibility to report any Health and Safety issues to the Head Teacher or Site staff.

## 15. Activities outside school hours

Agencies that use school facilities must ensure that they follow their own safeguarding procedures and are responsible for the children, staff and visitors in their care. They must also adhere to the LWCET policy.

## 16. Record-keeping

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child which is stored using CPOMS or MyConcern. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.



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

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

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

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

All staff are able to log incidents on this system but only those with enhanced responsibilities such as DSL, DDSL or SLT members can access previous incidents. All access is logged.

## 17. Complaints and concerns about school safeguarding policies

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

Other complaints

The school operates an open door policy where parents/carers are encouraged to raise any concerns with a member of the Senior Leadership Team. If a parent/carer wishes to raise a safeguarding related complaint, they should do so by using the individual school's Complaint Policy and Procedure.

Whistle-blowing

Each school has a separate whistle-blowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures.

## 18. Training

All staff

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

- Be integrated, aligned and considered as part of the whole-Trust safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners

- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment and recognizing that behaviour is a means of communicating unmet needs
  - Have a clear understanding of the needs of all pupils or seek to identify them

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings). Contractors and volunteers will receive appropriate training, if applicable.

#### The DSL and Deputy DSL

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

#### Governors and Trust Board Members

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

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

As the Chair of Governors of the LGC may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, they receive training in managing allegations for this purpose.

#### Recruitment – interview panels

At least one person conducting any interview for any post within any Trust school or the Central Team will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See Appendix 2 of this policy for more information about our safer recruitment procedures.

#### DSL/DDSL Staff who have contact with pupils and families

All staff who have contact with children and families with regard to safeguarding and child welfare have the opportunity to receive reflective supervision to support their own wellbeing and allow for support, coaching and training. This also allows for confidential discussions of sensitive issues.

## 19. Monitoring arrangements

This policy will be reviewed annually by the Trust Board in consultation with the LGCs and DSLs. At every review, it will be approved by the Trust Board.

## 20. Links with other policies

This policy links to the following policies and procedures:

- ❖ Behaviour
- ❖ Staff behaviour
- ❖ Staff code of conduct
- ❖ Complaints
- ❖ Health and safety
- ❖ Attendance
- ❖ Online safety/acceptable use
- ❖ Equality
- ❖ Relationships, health and sex education
- ❖ First aid / medical needs
- ❖ Curriculum
- ❖ Designated teacher for looked-after and previously looked-after children
- ❖ Privacy notices
- ❖ Educational visits
- ❖ Data protection and retention
- ❖ Whistle blowing
- ❖ Anti-bullying

## 21. Appendix 1 - Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

[The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

[The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

[The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Head Teacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

[The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

## 22. Appendix 2 - Early Help

### Early help assessment

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

The school will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Within our Trust school, we aim to improve the outcomes of all children. Provision to address any social and emotional needs is essential to enable them to reach their full potential. In order to do this we provide Co-ordinated Early Help to support children and families, working in partnership with them to increase independence and build resilience in order to have a positive impact on their wellbeing.

We identify needs and increase awareness in the school community by:

- Using Gloucestershire's Healthy Living and Learning on-line pupil survey
- Completing Parent and Child View questionnaires annually
- Engaging fully with the MARAC process (Multi-Agency Risk Assessment Conference)
- Working with the local MASH (multi-agency safeguarding hub) to support families and understand the Family Drug and Alcohol Court (FDAC) system
- Attending attendance and behaviour cluster groups
- Running an E-safety steering group who meet regularly and run regular awareness events and surveys of pupils, staff and parents
- Having regular pupil voice meetings
- Teaching specific lessons on mental wellbeing to all KS2 children
- Using the referral process for multi-agency support
- Providing Safeguarding training for all staff and sharing a clear flow diagram of reporting with all
- Ensuring the DSL, deputy DSL have all received multi-agency training and attend local safeguarding forums
- Ensuring DSLs co-work so that two professionals are aware of each step within identification and referral processes in case of absence
- Receiving alerts from the Gloucestershire Safeguarding Children Partnership
- All staff have received awareness training and understand what Child Sexual Exploitation and Child Criminal Exploitation is. If any member of staff feels that a child is putting themselves or is being put at risk of CSE/CCE they will follow child protection procedures by completing the screening tools which will be forwarded to Police and Social Care
- Having a member of staff trained to understand the correlation between Domestic Abuse and Child Protection
- Having a dedicated email group for Encompass Notifications whereby information is shared with us following Domestic Abuse incidents.
- Having allocated staff members to champion and build awareness of ACEs and Trauma Informed Practice
- Having all staff trained in Trauma Informed Relational Practice and SLT members trained at a higher level
- Having a member of staff trained by the Home Office in awareness of Female Genital Mutilation (FGM), Forced Marriage, Spirit Possession and Honour Based Violence
- Having a member of staff trained in recognising the signs of radicalisation and reporting these to the police and duty social worker
- Contacting the CYPS professional helpline, Nobody understands Labels (from GSCB), Liaising with Educational Psychology Service where it is thought a member of the school community (pupil or family member) may be at risk of Suicide.
- Providing regular awareness training in Special Educational Needs and Disability (SEND)
- Providing training for all staff in Attachment Disorder, Trauma, Foetal Alcohol Spectrum Disorder, Specific Learning Disabilities, Autism Spectrum Disorder and Physical Neurological Disorders and have raised awareness of the additional vulnerabilities of children who have SENDs

- Having a dedicated Attendance Officer who identifies children at risk of Persistent Absenteeism and chases up all absences, following procedures for Children Missing in Education where needed
- Giving options to disadvantaged and vulnerable pupils to self-refer in times of need
- Giving parents the option to self-refer for additional family support by contacting the Pastoral Team
- Having in place a programme of family learning
- Having in place a procedure to follow in the event of an unexpected or traumatic death of a pupil/child
- Having Mental Health Trailblazer referral process with our Mental Health Support Team to access support required in a timely manner in some of our Trust schools
- Having a Family Support Worker who works both directly or indirectly with families through school or self-referral.

We provide specific support for children and families including:

- Use of Personal Educational Plans (PEP) for Children In Care or previously in care.
- Use of Pastoral Support Plans for those at risk of exclusion
- Working closely with the Education Entitlement Team
- Signposting to outside agencies
- Supporting children and families facing serious illness
- Providing Bereavement and Loss Therapy
- Providing Family Support around issues of Trauma and Attachment
- Family Support for family breakdown and changes in the family unit
- Supporting Young Carers
- Supporting victims /witnesses of Domestic Violence
- Supporting children and families recently arrived in UK to adapt to a new culture/school experience
- Providing Parent classes and workshops
- Building emotional resilience and well being including supporting pupils with anxiety, self-esteem, anger and mental health issues with an emotionally available adult
- Provision of Social Emotional Aspects of Learning (SEAL) including developing emotional intelligence, social skills, empathy and friendship skills through classrooms, small groups and families
- Supporting parents to establish routines, self-care and independent skills in their children
- Talk Therapy, Helping children to understand emotions/social situations using Lego, Art Therapy, Play Therapy and Sandplay Therapy
- Providing support to families of prisoners
- Awareness raising of the vulnerabilities and impact caused by Adverse Childhood Experiences (ACEs) and how to support those impacted through Trauma Informed Relational Practice
- EP support and increased counselling support in the rare event of an unexpected or traumatic death of a child for the family, peers and staff.

It is always our wish to prevent additional therapy through preventative measures but where specific support is needed, we are lucky to be able to call upon a wide range of skills and resources to support both the children and families within our Trust community.

## 23. Appendix 3 - Allegations Management

### Section 1: Allegations that may meet the harms threshold

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates 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 – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO). We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A school 'case manager' will lead any investigation. This will be the Head Teacher (or another member of the DSL team), or the chair of governors where the Head Teacher is the subject of the allegation. The case manager will be identified at the earliest opportunity. Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organization was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative Trust school

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

## Definitions for outcomes of allegation investigations

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

## Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other



support is appropriate such as reminding them of the Employee Assistance Programme that the school buy into and the possibility of more intensive counselling through Occupational Health if this is necessary. A reminder will be given about contacting their trade union representative and sharing with a colleague if they so wish.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

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

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

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

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

#### Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions:

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

**Conclusion of a case where the allegation is substantiated** - If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

**Individuals returning to work after suspension** - If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports - If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations - If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The Trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

## Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file). For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate. We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

#### Non-recent allegations

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school or Trust that they were abused as a child, we will advise the individual to report the allegation to the police.

#### Section 2: Concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

#### Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the Trust may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

## Sharing low-level concerns

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

We will create this culture by:

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

## Responding to low-level concerns

If the concern is raised via a third party, the Head Teacher will collect evidence where necessary by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses.

The Head Teacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy and code of conduct. The Head Teacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

## Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Low level concerns will often lead to a reason to retrain individuals or groups of staff and this should be done at the earliest convenience.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in Section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## 24. Appendix 4 - Safer Recruitment and DBS Checks

### Recruitment and selection process

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

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

### Advertising

When advertising roles, we will make clear:

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

### Application forms

Our application forms will:

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

### Shortlisting

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

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

Once we have shortlisted candidates, we will ask shortlisted candidates to complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list

- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

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

#### Seeking references and checking employment history

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

When seeking references we will:

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

#### Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

#### Pre-appointment vetting checks

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

New staff



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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for two years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

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

Existing staff

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

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

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

#### Agency and third-party staff

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

#### Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

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

#### Trainee/Student Teachers

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## Volunteers

### We will:

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

## Governors and Trust Directors

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

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

## Staff working in alternative provision settings

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

## Adults who supervise pupils on work experience

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

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