

Date:	Review:
Signed :	Signed :
Trust Chief Executive Officer	Trust Chairman

The Amadeus Primary Academies Trust is committed to safeguarding children and young people and we expect everyone within in our schools to share this commitment.

Adults in our schools take all welfare concerns seriously and encourage children and young people to talk about anything that worries them.

Trustees, Governors, Staff and Volunteers will always act in the best interest of the child.

### Trustees

The responsibility for safeguarding of the pupils and staff within all our school's rests ultimately with the Amadeus Primary Academies Trust Board. The Board delegates the management for each school to its Local Governing Body.

Each school must ensure that it implements this safeguarding policy, it meets legal requirements, all required training is up to date as outlined below, procedures are checked regularly by the local governing body and safeguarding issues are reported to the Audit and Risk Committee of the Trust by the Head through the school Risk register which is updated each month or immediately to the relevant member of the Trust Leadership Team if they are significant. Headteachers have a meeting at least half termly with their designated Educational Executive Lead from within the Trust Leadership Team. This meeting includes a review of safeguarding and standards within the school. The Trust will implement the same safeguarding system which will be overseen by the Trust Leadership Team.

### Trust Leadership Team

Mr Peter Wilson	CEO & Accounting Officer
Mrs Sabrina Bridges	Chief Finance and Operations Officer
Mrs Sarah Young	Director of Education

The Trustee appointed as the Safeguarding lead is Mr P Rhodes (CEO & Accounting Officer)

The Trustee appointed Safeguarding lead is trained to level 3.

### Our Schools

The following schools form part of the Amadeus Primary Academies Trust.

Castilion Primary School	Copperfield Road, London, SE28 8QA	<a href="http://www.castilion.apat.org.uk">www.castilion.apat.org.uk</a>
Hillsgrove Primary School	Sidmouth Road, Welling DA16 1DR	<a href="http://www.hillsgrove.apat.org.uk">www.hillsgrove.apat.org.uk</a>
Holy Trinity Lamorbey CE Primary School	Burnt Oak Lane, Sidcup DA15 9DB	<a href="http://www.holytrinitylamorbey.apat.org.uk">www.holytrinitylamorbey.apat.org.uk</a>
Old Bexley CE Primary School	Hurst Road, Bexley, DA5 3JR	<a href="http://www.oldbexley.apat.org.uk">www.oldbexley.apat.org.uk</a>
St Paulinus CE Primary School	Iron Mill Lane, Dartford DA1 4RW	<a href="http://www.stpaulinus.apat.org.uk">www.stpaulinus.apat.org.uk</a>
St Paul's Cray CE Primary School	Buttermere Road, Orpington BR5 3WD	<a href="http://www.stpaulscray.apat.org.uk">www.stpaulscray.apat.org.uk</a>

## Purpose and Aims

Our Schools recognise the Trust's responsibilities to safeguard children. Our policy applies to all staff, volunteers, governors, and visitors in the school. Our aims are:

- To support the child's development in ways that will foster security, confidence, and independence.
- To raise awareness of all staff, including volunteers, of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm.
- The schools will have procedures and protocols which will be followed by all staff in cases of suspected abuse and/or the need for care.
- To develop and promote working relationships with other agencies as indicated in the 'Working Together to Safeguard Children' (2018).
- To ensure that all adults who have access to children have been checked as to their suitability and have an enhanced DBS disclosure, as well as being checked against the Independent Safeguarding Authority's (ISA) barred list (which replaces List 99) where appropriate. The school will implement recruitment procedures as recommended in *Keeping Children Safe in Education (September 2021)*.

## Procedures

Our procedures will be in line with the London Child Protection Procedures, Local Safeguarding Children Board and comply with guidance from the Department for Education.

- The Trust and each school will have a Designated Safeguarding Lead who will, in line with recommendations in the *Keeping Children Safe in Education (September 2021)* undertake training and refresher training at two yearly intervals. All other staff will undertake training and refresher training annually.
- All members of staff will develop their understanding of the signs and indicators of abuse or need.
- All members of staff will know how to respond to a pupil who discloses abuse.
- All staff will be kept up-to-date on safeguarding issues and will be able to identify concerns and understand procedures to protect and safeguard children and young people especially on specific safeguarding issues.
- All members of staff will be aware of any immediate/urgent action required to assist the child, e.g. emergency medical treatment.
- All members of staff will report concerns to the Designated Safeguarding Lead using the 'Concerns Form'
- Any allegations relating to staff must be reported to the Trust HR team.
- All parents/carers will be made aware of the school Child Protection/Safeguarding Procedures.
- All staff will be responsible for reporting concerns regarding a colleague's behaviour (refer to the 'Whistle-blowing' Policy & Procedures).
- The school procedures will be regularly reviewed and updated.
- All staff will have seen a copy of this policy and new staff will be given a copy as part of their induction programme.
- The Trust will receive regular reports about number of child protection referrals, allegations against school staff and other child protection/safeguarding matters.
- In each school, Governors will receive regular reports about numbers of child protection referrals, allegations against school staff and other child protection/safeguarding matters.
- In each school, a Governor will be identified to lead on Safeguarding and meet with the Designated Safeguarding Lead on a regular basis.
- Staff will understand that Data Protection is not a reason to withhold a safeguarding concern. The priority is to share the concern, but it is important that it is only with those that need to know.

## The Role of the Governing Body

Part 2 of Keeping Children Safe in Education (DfE, 2021) sets out the responsibilities of governing bodies. As part of the Trust's overarching responsibilities the Local Governing Body will:

- Through the Head teacher, remedy without delay any deficiencies or weaknesses in regard to child protection arrangements that are brought to the attention of the school management or Governing Body.
- Ensure that a senior member of staff of the school's leadership team is identified to take the role of Designated Safeguarding Lead (DSL) as defined in Keeping Children Safe in Education.

### **The Head must ensure that the policy states the nominated DSLs and Safeguarding team for the Amadeus Primary Academies Trust School.**

- Ensure a second member of staff, the Deputy Designated Safeguarding Lead is identified to fulfil the role of the Designated Safeguarding Lead in their absence.
- Ensure that the school has a nominated governor responsible for child protection, to take lead responsibility in the Governing Body for Safeguarding and Child Protection, and to provide support and challenge to the DSL to ensure that the work of the school conforms to this policy. The nominated governors for the Amadeus Primary Academy Trust Schools are:
- Ensure that a safeguarding audit is completed annually by the head teacher and nominated child protection governor.
- Ensure that on arrival at school all visitors (including contractors) are provided with a copy of the safeguarding policy making them aware of their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Lead or her Deputy, and the names of the Designated Safeguarding Lead and her Deputy.
- Make this policy available to parents and carers through the school website and ensure that parents understand the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus.
- Ensure that children and young people are taught about keeping themselves safe.
- Ensure that the school contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children (DfE, 2018). This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. This covers a range of work such as: Working with the Early Help team regarding resistant families, working to help identify children and young people who are privately fostered, working to help protect children from extremist and violent views through multi-agency work.
- Ensure that the school develops effective links with relevant agencies and co-operates as required with their enquiries regarding child protection matters, including attendance at case conferences.
- Notifying Children's Social Care immediately (on the first day of absence) if there is an unexplained absence of a child on a Child Protection Plan.
- Contacting the child's social worker directly if there is an unexplained absence of a child who is Looked After. This will then trigger actions identified in the 'Joint Police and Social Care Protocol for Dealing with Children Missing from Care'.
- Ensure that the school's Child Protection procedures are in accordance with Local Authority guidance and inter-agency procedures agreed through the Bexley Safeguarding Children Board.
- Ensure there is a staff behaviour policy (code of conduct- Appendix 6), which links to this child protection policy, and which is shared with all current staff and forms part of the induction training for new staff.
- Ensure that any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS) for consideration for barring, following resignation, dismissal or when we cease to use their service as a result of a substantiated allegation, in the case of a

volunteer.

- Review the implementation of this policy, and its effectiveness, annually (no later than the date of next review given on the front cover).
- Ensure all staff members have an awareness of the local contextual safeguarding priorities. For the pupils attending \_\_\_\_\_ school the local contextual issues are \_\_\_\_\_

## GDPR Data Protection

Amadeus Primary Academies Trust is a Multi Academy Trust and the Data Controller for all the Personal Data processed by its academies and by the central team of the Trust.

The Data Protection Officer (the “DPO”) is responsible for ensuring the Trust is compliant with the GDPR. This post is held at Trust level by Sabrina Bridges, [dpo@apat.org.uk](mailto:dpo@apat.org.uk). In addition, a data protection lead has been appointed in each academy within the Trust who will report to the DPO on all matters relating to data protection compliance, to be known as the Academy Data Protection Lead. Any questions or concerns about the operation of the GDPR policy should be referred in the first instance to the DPO.

As detailed in the Keeping Children Safe in Education: It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Data Protection Act 2018 and GDPR do not prevent, or limit, 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 promote the welfare and protect the safety of children. In the event of a DSAR with a question of accuracy, the school are asked to liaise with the DPO. In some instances, it would be fair to consider a short period of time to address inaccuracies but not more than 48 hours before the data is shared.

Governing bodies and proprietors should ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR. Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as ‘special category personal data’.

Governing bodies and proprietors should ensure that staff who need to share ‘special category personal data’ are aware that the Data Protection Act 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information. This includes allowing 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.

Questions regarding how we handle your personal information should be directed to the DPO. Please contact the DPO, Sabrina Bridges email [dpo@apat.org.uk](mailto:dpo@apat.org.uk). You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

The school must ensure that the dates, names, and training information is added. Training must be organised via the central team in order to retain an update record of staff training. The school must liaise with the assigned Executive Leader in the event of any questions, concerns, or issues.

### Trust Leadership Team

Mr Peter Rhodes	CEO & Accounting Officer
Mrs Sabrina Bridges, Chief Finance and Operations Officer	HR, Finance, Compliance
Mrs Sarah Young, Director of Education	Education

The school have updated the following sections to reflect where individual elements relating to Safeguarding may be different. This will include:

- The school safeguarding team including LGB Chair and Governor allocated to support and oversee safeguarding and child protection at the school.
- Local Authority contact details, team, and forms.
- School policies and procedures (appendix 5 and 7).
- Safeguarding system (online/manual)

The school must print and update the relevant sections within the policy. Once completed, they must include appendix 6 and 7 and arrange LGB approval.

Safeguarding/Child Protection Policy for .....

The policy was last reviewed by : ..... on .....

The LGB reviewed the policy on: .....

A safeguarding audit was completed by: ..... on  
 .....

The LGB representative that reviewed the audit findings was ..... on  
 .....

**Safeguarding Team**

Headteacher/Head of School .....

Executive Leader (Trust Leadership Team) .....

Designated Safeguarding Lead for Child Protection: .....

Designated Teacher of Looked after Children: .....

Person in charge of E-Safety .....

Governor for Safeguarding/Child protection: .....

Date policy was shared with all staff: .....

Date of next audit: .....

Date of next review: .....

## Policy statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children and adults feel respected and valued. We maintain an attitude of 'it could happen here' where safeguarding is concerned and promote a culture of openness where children and adults are able to talk and are listened to.

This policy will provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school. It will be used to inform parents and carers of how we will safeguard their children whilst they are in our care.

The policy provides information regarding different types of abuse, links to statutory and non-statutory documentation and outlines our procedures which ensure our children receive effective support, protection and justice.

## Definition of safeguarding

- protecting children from maltreatment.
- preventing impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes

## Introduction

The procedures contained in this policy apply to all staff and governors and are consistent with those of the (local authority) ..... Safeguarding Children's Partnerships and locally agreed procedures.

This school takes seriously its responsibility to protect and safeguard the children in its care and has updated this policy to meet the requirements within updated statutory guidance documents. These documents outline the responsibilities of schools, colleges, independent schools, academies and free schools (by virtue of their funding agreement) in carrying out their duties to safeguard and promote the welfare of children by ensuring that "mechanisms are in place to assist staff to understand and discharge their role and responsibilities".

The school will support the pupils in their understanding of staying safe when using new technology (in accordance with the DfE guidance published in June 2019 'Teaching online safety in schools' and any additional relevant guidance.)

Pupils will be supported in their understanding of personal safety through the broad curricular offer and the teaching of Relationships Education (primary), Relationships and Sex Education (RSE) and Health Education. Policies are available on the school's website.

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## 1. Aims and principles

- 1.1 This school fully recognises its responsibilities for safeguarding children including those in need of protection.
- 1.2 Aims
- To provide staff, volunteers and governors with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
  - To ensure consistent good practice across the school.
  - To demonstrate our commitment to protecting children.
- 1.3 Principles and values
- Children have a right to feel secure and cannot learn effectively unless they do.
  - All children have a right to be protected from harm.
  - All staff, volunteers and governors have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account *contextual safeguarding*, in accordance with the guidance.
  - We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.
  - Whilst the school will work openly with parents and carers as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.
- 1.4 The school will
- Ensure safer recruitment procedures are robust and in line with national legislation and a strict staff code of conduct is promoted.
  - Ensure a suitably trained workforce who are confident to implement the outlined procedures for identifying and reporting cases (or suspected cases), of abuse and responding to reports of sexual violence and harassment between children.
- 1.5 We recognise that because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:
- Raise awareness of child protection issues and equip children with the skills needed to keep themselves safe and support their mental well-being.
  - Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
  - Ensure children know that there are adults in the school whom they can approach if they are worried.
  - Promote opportunities across the curriculum for children to develop the skills they need to recognise and stay safe from abuse.

## 2 Statutory Framework

2.1 In order to safeguard and promote the welfare of children, the school will act in accordance with Keeping Children Safe in Education (September 2020) and other legislation, guidance<sup>1</sup> and advice detailed in Appendix 2

2.2 More specifically, we will:

- Ensure we have a Designated Safeguarding Lead (DSL) for child protection, and deputy safeguarding lead (DDSL) for child protection, who have received appropriate training and support for roles.
- Ensure we have a nominated governor responsible for child protection.
  
- Ensure every member of staff (including temporary and supply staff and volunteers) and governing body knows the name and role of the DSL.
- Have a comprehensive induction policy in place specifically outlining the school Safeguarding/CP policy; the staff code of conduct; acceptable use (ICT including mobile phones and cameras); school behaviour policy; the safeguarding response to children who go missing from education and identity and role of the DSL;
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL and have signed that they have read Keeping Children Safe in Education (September 2020) Annex A and Part 1;
- Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus or website.
- Liaise with the Executive Lead or appropriate member of the Trust Leadership Team as required.
- Notify Social Care immediately (on the first day of absence) if there is an unexplained absence of a child on a Child Protection Plan.
- Contact the child's social worker directly if there is an unexplained absence of a child who is Looked After. This may then trigger actions identified in the "Joint Police and Social Care Protocol for Dealing with Children Missing from Care".
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Keep detailed, accurate, secure written records of concerns about children, even where there is no need to refer the matter immediately, utilising CPOMs to store this information.
- Have procedures in place to re-assess concerns when a child's situation fails to improve.
- Ensure all safeguarding and child protection records are kept securely, separate from the main pupil file, and in locked locations (This will be using the system required of the Trust).
- Follow the procedures set out in section 14 of this document, if an allegation is made against an employed member of staff, supply staff or volunteer.
- Ensure safe recruitment practices are always followed.
- Ensure clear protocols are in place for the appropriate supervision of visitors (including visiting speakers/educators) and that the school's values and British Values are upheld.
- Have procedures in place to gather and respond to the views and/or concerns of pupils
- Seek to hold more than one emergency contact number for each pupil
- Ensure all staff members have an awareness of the local contextual safeguarding priorities. For the pupils attending \_\_\_\_\_ school the local contextual issues are

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### 3 Safeguarding Training

- 3.1 All staff members will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The school must liaise with the central team regarding training for staff.
- 3.2 The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training. In addition to the formal training, their knowledge and skills will 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, but at least annually, to allow them to understand and keep up with any developments relevant to their role.
- 3.3 Any newly appointed DSL will attend the DSL one-day training provided by the Trust Safeguarding Training Partners to schools or another accredited training provider, followed by any LA relevant Working Together courses before taking lead responsibility for safeguarding. The deputy DSL will take a leading role on safeguarding for the short time that the DSL is waiting to receive training.
- 3.4 The designated Governor for Safeguarding and Child Protection will undertake governor safeguarding training annually.
- 3.5 The DSL will retain a training record indicating the attendance at safeguarding training so that absent staff can receive an update on their return. Additionally, the DSL will retain a record showing staff have read Keeping Children Safe in Education (September 2020) Annex A and Part 1. This will be transferred to the staff portal and maintained centrally.
- 3.6 All new members of staff will receive child protection training as part of their induction programme.
- 3.7 Briefings and updates on child protection and safeguarding procedures will be provided on a regular basis, at least annually, but more frequently when necessary, to ensure that all members of staff are familiar with any changes to the school policy or in the national guidance materials as they occur.
- 3.8 At least one member of every appointments panel will have gained accreditation through Safer Recruitment training (statutory requirement). The school will ensure that there are always sufficient numbers of suitably trained staff and governors in post. This is to be updated every 5 years.
- 3.9 Record of training (summary):  
 The record of training must be made available to the central team. The central team are in the process of finalising the portal for the purposes of training, once complete, the DSL will be required to update the staff portal.

	Staff/governor name/role	Date training completed
Designated Safeguarding lead training		
Prevent awareness		
Governor safeguarding training	Full GB / Safeguarding Governor	
Safer Recruitment		
Annual safeguarding/CP training for all staff to include information on		
Please indicate: Whole School / Teachers / Teaching Assistants / Support Staff		
Honour Based Abuse (FGM, forced marriage etc)	Whole School	
Child Sexual Exploitation (CSE)	Whole School	
Peer to peer abuse	Whole School	
Child criminal exploitation and County lines	Whole School	
Prevent and extremism	Whole School	
E-Safety training	Whole School	
First Aid	Whole School	
Physical intervention (restraint)		
Sexual harassment / Sexual Violence	Whole School	

#### 4 Headteacher's / Head of School's Roles/ Responsibilities re: Safeguarding

4.1 In line with the statutory guidance (2020), the Head will ensure that systems and procedures to ensure all staff understand their role in safeguarding and promoting the welfare of children. The Head will ensure:

- The policies and procedures adopted by the governing body or proprietor are fully implemented and followed by all staff.
- The DSL is a senior member of the School Leadership Team and that he / she has a clear and concise job description explicitly referring to the role of taking lead responsibility for safeguarding and child protection (including online safety)
- Sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies, where appropriate.
- Induction procedures are robust and meet the requirements outlined in KCSIE 2021
- A barred list check is completed, and a risk assessment is in place to ensure any individual who starts before a DBS certificate is received, is appropriately supervised.
- There are arrangements in place for DSL availability to cover any out of hours or out of

term time activities taking place.

- Procedures are in place to refer to DBS any person dismissed or removed due to safeguarding concerns.
- The Trust will take the lead role in the investigation of any allegation concerning a supply teacher in post and will keep the supply agency informed throughout.
- The school is satisfied that any alternative provider used by the school has appropriate safeguarding procedures in place.

## 5 The Designated Safeguarding Lead for Child Protection's Roles & Responsibilities (further detail in KCSIE 2021 Annex C)

### 5.1 Broad areas of responsibility proposed for the DSL for child protection.

Recognise how to identify signs of abuse and neglect and when it is appropriate to make a referral to other agencies.

- Refer cases of suspected abuse or allegations to the relevant statutory agencies (children's social care or the police).
- Act as a source of support, advice and expertise to staff within the educational establishment.
- Seek advice from and share information with relevant statutory agencies before seeking consent or informing parents of a referral. Where practicable, concerns should be discussed with the family and agreement sought for a referral to children's services unless this may, either by delay or the behavioural response it prompts, place the child at risk of significant harm. (Consideration will be given that by alerting parents or carers about a referral could potentially jeopardise a police or criminal investigation, DSLs should seek advice if this is the case.) Liaise with the head teacher or principal (where the role is not carried out by the headteacher or principal) to inform him or her of any issues and ongoing enquiries under section 47 of the Children Act 1989 and police investigations and ensure there is always cover for this role;
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes, such as LA Early Help Guidance.
- 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 that where a child needs a social worker, this should help inform decisions about safeguarding and the promotion of welfare and support within the school setting.
- Liaise as appropriate with staff including IT technician, the SENCO and the named person with oversight for mental health.
- Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new or part-time staff who may work with different educational establishments.
- Ensure all staff have robust induction training covering child protection and are able to recognise and report any concerns about children's safety and welfare immediately they arise.
- Ensure all staff are aware of the guidance 'What to do if you're worried a Child is being Abused'.
- Ensure staff are aware of contextual safeguarding and the influence of factors outside the school/college or the child's own family including vulnerability to possible abuse, exploitation and youth violence.
- Feedback and reassure staff who have raised a child protection concern.
- Keep detailed, accurate, secure written records of referrals and / or concerns.
- Be able to keep detailed, accurate, secure written records of referrals and/or concerns.
- Maintain an up-to-date awareness of safeguarding developments and distribute these as appropriate to all staff in line with advice from the LA Safeguarding Children's Partnership.
- Have attended Prevent Awareness training via the LA Prevent Education Officer
- Ensure the establishment's child protection policy and procedures are updated and reviewed annually and work with the governing body, management committee or proprietor regarding this.
- Ensure parents can see copies of the child protection policy and procedures which alerts them

to the fact that referrals about suspected abuse or neglect may be made and the role of the establishment in this.

- Where children leave the establishment ensure their child protection file is provided (with a receipt obtained) for any new establishment as soon as possible but transferred separately and securely from the main pupil file.

5.2 The designated safeguarding lead will also help to promote educational outcomes of vulnerable children and those with a social worker. They will encourage staff to maintain a culture of high aspirations for this cohort and support teachers to identify any specific challenges or additional academic support required.

## 6 The Governing Body's Roles & Responsibilities re Safeguarding

6.1 Keeping Children Safe in Education (September 2020) provides the following statutory guidance: Safeguarding arrangements that schools and FE colleges should have in place. Governing bodies and proprietors have a strategic leadership responsibility for their school's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to KCSIE 2021 guidance, ensuring policies, procedures and training in their schools are effective and comply with the law at all times.

6.2 In light of this statutory guidance the Governing Body will nominate a governor who will be responsible for Safeguarding and Child Protection and will liaise with the DSL on matters relating to Safeguarding and Child Protection.

6.3 The Governing Body will ensure that:

- The school has a child protection policy and procedures in place that are in accordance with local authority guidance and locally agreed interagency procedures, and the policy is made available publicly on the website or on request;
- The school operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children.
- The school adheres to the Trust procedures for dealing with allegations of abuse against members of staff (including supply staff) and volunteers that comply with guidance from the local authority and locally agreed interagency procedures.
- A senior member of the school's leadership team is designated to take lead responsibility for dealing with safeguarding and child protection issues, providing advice and support to other staff, liaising with the local authority, and working with other agencies.
- The Designated Safeguarding Lead will undertake training to support inter-agency working.
- There is annual training for all staff to equip them to carry out their responsibilities for child protection effectively. Also, that all temporary staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities.
- There are clear systems and processes in place for identifying possible mental health concerns, including routes to escalate and clear accountability systems<sup>2</sup>
- The school adheres to the Trust whistleblowing policy/procedure is in place and is reflected in staff training and staff behaviour policies (code of conduct) to encourage any staff member or volunteer to report concerns regarding safeguarding practice in school.
- The school liaises with the relevant member of the Trust Leadership Team in the event that an allegation or safeguarding complaint is received.
- All allegations or safeguarding complaints are appropriately investigated by a senior leader from within the school and if necessary, by an independent investigator as assigned by the Trust Leadership Team.
- The head teacher remedies without delay any deficiencies or weaknesses in regard to child protection arrangements that are brought to his/her attention.
- Understands that a member of the Trust Leadership Team (usually the Executive Leader) is nominated to be responsible for liaising with the Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against the Headteacher (Contact details of the LADO are given in section 14.7 (Ensure these match LA));
- The Governing Body reviews the child protection policy and the effectiveness of

safeguarding procedures (at least) annually.

- With staff welfare in mind, the Governing Body will consider the necessity and appropriateness of arranging for 'Safeguarding Supervision' for the DSL and or Deputy DSLs within the school.

## 7 The Role & Responsibilities of all Staff within School

- 7.1 All school and college staff members should read Keeping Children Safe in Education (2021) Part 1 and Annex A. They should be aware of the signs of abuse and neglect (Appendix 1 attached) so that they are able to identify cases of children who may be in need of help or protection.
- 7.2 Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- 7.3 Children with special educational needs (SEN) and disabilities or those with certain health conditions can face additional safeguarding challenges. Staff are aware of the additional barriers in identifying possible abuse and neglect in these children. They recognise the need to:
- Explore the reasons for changes in behaviour, mood and injury rather than assume it is related to the child's disability.
  - Understand these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
  - Understand that children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs.
  - Overcome the barriers and difficulties in communication with these children.
- 7.4 All staff will be aware that mental health problems can be an indicator that a child has suffered abuse, neglect or exploitation. They are well placed to observe the children and their behaviours. All staff will ensure they are aware of their responsibilities for safeguarding and child protection in being alert to the signs of abuse and of their responsibility to report and record any concerns. This means that they must:
- Recognise that a disclosure may come directly from the child, or from a third party, e.g. friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of signs, symptoms and knowledge of possible indicators of abuse.
  - Recognise that peer-on-peer abuse (all forms, including physical and sexual violence and harassment, sexting, 'up skirting'<sup>3</sup> and bullying and initiation/hazing) must not be downplayed and must be taken seriously and appropriately reported.
  - Be aware of indicators which can signal involvement with violent crime (absences from school, change in friendships or relationships with older individuals/groups, decline in performance or unexplained injuries). Also the likelihood of involvement of being male or permanently excluded from school.
  - Take seriously any disclosures made to them and provide reassurance to the discloser through their responses and behaviour (without promising they will not tell anyone). Ensuring the victim or person disclosing is not given the impression they are causing a problem by reporting a concern or abuse.
  - Read carefully any documentation provided by the DSL to update their safeguarding training.
- 7.5 It is recognised that a child may disclose sensitive information at any time of the day, and in particular this may occur outside of normal lesson time, e.g. break periods or during before/after school club sessions. It is therefore important that all the staff are aware of the signs and behaviour which may indicate abuse (see section 9 and Appendix 1).
- 7.6 All staff and volunteers have a duty to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. Where a staff member feels unable to raise an issue

or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

*The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)*

## 8 Early Help Guidance

- 8.1 LA Early Help Guidance supports children and families with emerging needs and promotes a shared responsibility to facilitate significant and sustained change in children’s lives, building resilience, preventing and protecting children from harm. Early help is focused on developing and breaking intergenerational cycles of poverty through working with children’s parents/carers and families.

Professionals should, in particular, be alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs, including medical needs
- Has special educational needs
- Is a young carer
- Is showing signs of engaging in anti-social or criminal behaviour
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- Is showing early signs of abuse and/or neglect.

## 9 When to be concerned

- 9.1 All staff and volunteers must be aware that the main categories of abuse are:
- Neglect
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
- 9.2 All staff and volunteers must act in accordance with this policy if a child presents with indicators of abuse (see Appendix 1 for details).

## 10 Dealing with a Disclosure/Reporting concerns See (Appendix 3 flowchart)

- 10.1 If any member of staff has a concern about a particular child in their care, they must immediately report their concerns to, and seek advice from the Designated Safeguarding Lead, or in their absence, the Deputy Designated Safeguarding Lead. Staff must provide the DSL with a signed and dated written (or electronic) record of their concerns. Matters should be escalated to the relevant member of the Trust Leadership Team.
- 10.2 All staff should be aware of the process for making referrals to children’s social care and for statutory assessments under the Children’s Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow referral, along with the role they might be expected to play in such assessment.
- 10.3 If a child discloses that he or she has been abused in some way the member of staff should:
- Find time and, if necessary, a suitable place to listen to the child, when information about possible abuse comes to light.

- Listen to what is being said without displaying shock or disbelief.
- Do not make false promises which may not be able to be fulfilled and do not promise confidentiality.
- Allow the child to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify. Ask open questions such as “Tell me, and How did that happen”.
- Do not ask leading questions but, if necessary, (KCSIE 2021 states) the member of staff can ask the question ‘have you been harmed’ and ‘how’?
- Not criticise the alleged perpetrator.
- Reassure the child that what has happened is not his or her fault.
- Stress that it was the right thing to tell.
- Explain what has to be done next and who has to be told.
- Find out just enough to be sure of the need to refer, and keep any questions open rather than closed.
- Make records that are factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells nor should any abuser be questioned.
- Sign and date the record of disclosure.
- Speak with the Designated Safeguarding Lead for Child Protection, and provide him/her with the signed, dated written record, using the agreed school procedures, without delay.

10.3 The same approach to receiving a disclosure must be taken if the discloser is not the allegedly abused child but another child or an adult.

10.4 Education is a referrer, not an investigative agency for child protection matters. An incident may eventually end up as a court case and children's evidence can all too easily be compromised by leading questions or repeated recital.

10.5 When the DSL for Child Protection, or in his/her absence, the Deputy DSL for Child Protection, has been informed, he/she will make the decision whether or not to refer the concern to Social Care. The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer.

MASH Consultation Line Tel-\_\_\_\_\_ LA contact Here \_\_\_\_\_ or  
 contact LADO/ Safeguarding Coordinator for Schools on \_\_\_\_\_.

Referrals will be made as soon as possible by telephone and the appropriate forms completed and sent at the same time. Referrals to Children's Social Care must be made to the Multi Agency Safeguarding Hub (MASH) Tel \_\_\_\_\_ (see contact details below)

Local authority Name & Address \_\_\_\_\_

## 11 Confidentiality

11.1 Safeguarding children raises issues of confidentiality that must be clearly understood by all staff / volunteers in school. All staff/volunteers in school have a responsibility to share relevant information about the protection of children with other professionals. This sharing of information is outlined in the guidance ‘Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers’ (July 2018). It identifies seven golden rules for sharing information. It reminds practitioners that the General Data Protection Regulation (GDPR), Data Protection Act 2018 (and 2020 update) and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

11.2 If a child discloses to a member of staff/volunteer and asks that the information is kept secret, it is important that the member of staff / volunteer tells the child in a manner appropriate to the child's age / stage of development that they cannot promise complete confidentiality – instead he/she must explain that he/she may need to pass information to other professionals to help keep the child or other children safe.

11.3 Staff / volunteers who receive information about children and their families in the course of their work shall share that information only within appropriate contexts.

## 12 Communication with Parents

12.1 Parents and carers will be made aware of the school safeguarding/child protection policy through published information and in initial meetings with parent and carers of new children. Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership between Education Services and Social Care. It will be made clear that this is a legal obligation and not a personal decision.

12.2 The Governing Body makes this policy available to parents, carers and children through the school website. A hard copy is also available on request.

## 13 Record Keeping

13.1 All concern forms/body maps and chronology documents should be signed and dated. They should together provide an accurate factual account of the concern and action taken by the school.

13.2 The completed forms/records will be kept for the duration of the child's school career and where a child changes school the forms/records will be forwarded to the DSL at the new school within 5 days of the change of school. The school will retain a receipt for the records signed by the receiving school.

13.3 The information contained will be regarded as confidential. Any request for access to the information by no local LA Safeguarding Children Partnership Agencies (e.g. Solicitor, investigating agent) will be referred to the Head teacher/Child Protection Designated Safeguarding Lead who is advised to seek legal advice before acting.

13.4 Record keeping at School

- All records of concern and multi-agency involvement should be kept separate from the child's academic records. They must be kept securely with access only for the DSL, Deputy DSL's, Head and Trust Leadership Team.
- The procedures outlined above (Section 10.1) should be followed.

## 14 Dealing with Allegations against School Staff (see also Keeping Children Safe in Education September 2020 part 4 for further details as well as flowchart in Appendix 3)

14.1 There are two levels of concern / allegation. An allegation that may meet the harms threshold and an allegation or concern that does not meet the harms threshold 'low level concern'. An allegation is any information which indicates that a member of staff (including supply staff) or a volunteer or contractor may have:

- Behaved in a way that has or may have harmed a child.
- Possibly committed a criminal offence against or in relation to a child.
- Behaved towards a child or children in a way which indicates s/he will pose a risk of harm if they work regularly or closely with children.

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Behaved in a way contrary to the Staff code of conduct

- 14.2 This applies to any child the member of staff / supply staff/ volunteer has contact with in their personal, professional or community life.
- 14.3 To reduce the risk of allegations, all staff and volunteers must be aware of safer working practice and must be familiar with the Government document, *'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.'*
- 14.4 Any concern or allegation should be reported immediately to the DSL or Head Teacher (unless the allegation relates to the Head Teacher see 14.10 below). S/he should take the matter seriously and keep an open mind. S/he should contact the Trust Finance & Operations Director immediately. The DSL/Head should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality must not be promised, and the person must be advised that the concern will be shared on a „need to know“ basis only.
- 14.5 Actions to be taken include making an immediate accurate, written record of the concern or allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record must be signed and dated.
- 14.6 The recipient of a concern or allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.
- 14.7 The Trust Leadership Team may involve the HR Manager and relevant DSL/Head to assess whether it is necessary to refer to the Local Authority Designated Officer (LADO) to determine the next step. The Children Safeguarding Officers in the LADO Team in LA is \_\_\_\_\_
- The LADO number is \_\_\_\_\_ and the email address is \_\_\_\_\_
- 14.8 If the concern or allegation meets any of the four criteria set out in section 14.1 then a member of the Trust Leadership Team shall contact the LADO (Education) without delay and provide the LADO with written confirmation of the allegation.
- 14.9 The member of the Trust Leadership Team or HR Manager shall, as soon as possible, following briefing from the LADO inform the subject of the concern or allegation. (If the concern or allegation involves a supply teacher/staff, the agency will be informed and invited to share any information relating to previous concerns or allegations).
- 14.10 If there is an allegation or concern raised against the Head Teacher, then the relevant Executive Leader of the Trust Leadership team should be contacted immediately, and they will liaise with the Finance & Operations Director
- Trust Leadership Team  
 Mr Peter Rhodes, CEO & Accounting Officer  
 Mrs Sabrina Bridges, Chief Finance and Operations Officer  
 Mrs Sarah Young, Director of Education
- HR, Finance, Compliance  
 Education
- 14.11 In the event of allegations or concerns against the Head Teacher the Trust Leadership Team or HR Manager will contact the LADO.

## 15 Allegations concerning other children -Peer on Peer Abuse

- 15.1 This policy recognises that children are capable of abusing their peers. Staff are aware that any allegations will be investigated appropriately by reporting concerns to the DSL and will never be tolerated or passed off as “banter” or “part of growing up”. Any form of inappropriate touching, physical abuse such as hitting, kicking, shaking, biting and hair pulling, or evidence of ‘initiation procedures, sexting, up-skirting (or other inappropriate use of new technology) will be robustly followed up.
- 15.2 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. All staff understand the importance of challenging inappropriate behaviours between peers. There will be a zero-tolerance approach to sexual violence and sexual harassment. Staff will not downplay certain behaviours, for example dismissing sexual harassment as banter, having a laugh, part of growing up or boys being boys as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- 15.3 Peer-on-peer abuse can manifest itself in many ways. The curriculum and in particular the RSE/RSHE curriculum provide opportunity for the school to help children safeguarding themselves from new technology and through learning about personal safety. (See also ICT policy, curriculum policy, antibullying policy and equalities policy.)
- 15.4 The school provides regular online safety information for children and they are given key information from CEOP and other online safety sites.

## 16 Monitoring & Evaluation

The responsibility for ensuring that the Safeguarding/Child Protection Policy and procedures are in place, available to parents and reviewed annually lies with the Governing Body. This policy will be reviewed in line with the timescale and details set out on the front cover.

## 17 List of related policies/procedures

Anti-bullying policy	Behaviour policy	Health Education	CSE/CCE
Child Protection	Equalities policy	Attendance	Photography policy
Medical Needs	Asthma	Safer Recruitment in schools	FGM
E-safety policy	Whistleblowing	Induction policy	Forced Marriage
ICT policy	Relationships Education Policy (RE)	Drugs in school	Intimate Care
Acceptable use agreements	Relationships and Sex Education (RSE)	Staff Code of Conduct (staff behaviour policy)	Positive Handling
Health and Safety	Curriculum		

Please ensure that the school policy references any policy issued by the Trust.

## Appendix 1: Types and Indicators of Abuse (to be read in conjunction with Keeping Children Safe in Education Part 1)

NB. This guidance is provided as a useful reminder of the types and indicators of abuse but should always be considered within the context of a comprehensive training programme and not as a substitute for more in-depth consideration

There are four categories of abuse, which may result in a child being placed on the Child Protection Register. They are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

### Definitions of child abuse

'Child Abuse and neglect' is a generic term encompassing all ill treatment of children including serious physical and sexual assault as well as cases where the standard of care does not adequately support the child's health (physical or mental) or development. Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm. Abuse can occur in a family, an institutional or community setting. The perpetrator may be known or not known to the child. There are 4 broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child may suffer more than one type of abuse.

#### 1. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a 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.

Possible indicators of Physical Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries including burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away

#### 2. Emotional Abuse

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

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

- not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate.
- 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 participating in normal social interaction.
- seeing or hearing the ill-treatment of another (including witnessing domestic violence)
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Possible indicators of Emotional Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Physical and/or mental and/or emotional development lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour e.g. thumb sucking, hair twisting, rocking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging

### 3. Sexual Abuse

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 known (in education) as peer-on-peer abuse.

Possible indicators of Sexual Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

Sudden changes in behaviour or in school performance

- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour e.g. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling
- Sleep disturbances, nightmares
- Chronic illness, e.g. throat infection, venereal disease or other STD \* Anorexia, bulimia
- Unexplained pregnancy
- Fear of undressing, e.g. for sport
- Phobias or panic attacks

## 4. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible indicators of Neglect - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

## Additional safeguarding issues

### Honour Based Abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour, often involves a wider

network or family or community pressure and can include multiple perpetrators. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

- FGM mandatory reporting duty

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover that 'FGM appears to have been carried out on a girl under 18'. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not examine pupils. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases.

Mandatory reporting of female genital mutilation procedural information can be found at:

- Possible indicators of Female genital mutilation (FGM)
- Holiday requests made to school for significant lengths of time (Pre warning)
- Long periods of time away from the classroom during the day with bladder or menstrual problems
- Avoidance of P.E.
- Difficulty walking, sitting or standing
- Prolonged absences from school
- Noticeable behaviour changes
- Withdrawal
- Depression
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain

### Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

### Domestic Abuse

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 domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. The child may blame themselves or may have had to leave home.

Young people can also experience domestic abuse within their own intimate relationships. This is a form of peer-on-peer abuse.

Operation Encompass – helps police and schools to work together to provide emotional and practical help when children have experienced a domestic incident. The DSL will be notified of a domestic incident before the child arrives at school the following day and can therefore arrange appropriate support.

### Children missing from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect which may include sexual abuse or exploitation and child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour bases abuse or risk of forced marriage. The law requires all schools to have an admission register and with the exception of schools where pupils are boarders, an attendance register. All pupils must be placed on both registers. Staff should be aware of their school or college's unauthorised absence and children missing from education procedures.

The school must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

### Private fostering

Private fostering is when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not their parent, a person with parental responsibility for them or a relative in their own home

To help keep children safe and support families, all parents and private foster carers must notify MASH of care arrangements for children so they can ensure a child is well cared for. If a member of school staff suspects a child may be being privately fostered without formal arrangement it is important you share this information in

case a child is at risk of harm.

## Preventing Radicalisation

Extremist ideology, radicalisation and terrorism

Children and young people can suffer harm when exposed to an extremist ideology which may be social, political or religious in presentation. This harm can range from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to children being groomed for involvement in violent actions.

**Extremism:** the vocal or active opposition to our fundamental British values. This also includes calling for the death of members of the armed forces

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

**Terrorism:** an ‘action that endangers or causes serious violence to a person; causes serious damage to property or seriously interferes or disrupts an electronic system’. The use or threat must be designed to influence government or intimidate the public to advance a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability for which an extremist or terrorist group may appear to provide an answer. Similarly, radicalisation can occur through different methods such as social media or the internet.

**PREVENT DUTY** - Section 26 of the Counter-Terrorism and Security Act 2015 (“the CTSA 2015”), places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales is specifically concerned with schools (but also covers childcare)

The statutory “Revised Prevent duty guidance: for England and Wales” (for schools) summarises the requirements on schools in terms of four general themes: Risk assessment, working in partnership, staff training and IT policies

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty.

The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Partnership. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child’s parents in line with the individual school’s safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.

The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the DSL lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.

Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in

If the Prevent referral is passed to a multi-agency Channel Panel, then a member of school staff will attend (if asked) to help with any assessment of vulnerability.

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

Both are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants or through violence or the threat of violence. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation including, sexual identity, cognitive ability, learning difficulties, communication ability etc. Children can be exploited by adult males, females, individual or groups or by other children (who themselves may be experiencing exploitation).

CSE is a form of sexual abuse. It can involve violent, humiliating and degrading sexual assaults. It can involve penetrative or non-penetrative acts or it may involve non-contact activities such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities or encouraging them to behave in sexually inappropriate ways. Children can also be groomed in preparation for abuse (including via the internet). The manipulation or 'grooming' process involves befriending children, gaining their trust,

sometimes over a long period of time, before the abuse begins. Significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

CSE can be a one-off occurrence and may happen without the child's knowledge e.g. other sharing videos or images on social media.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited.

CCE is when children are forced or manipulated into participating in criminal activity. This can range from the transportation of drugs, weapons or money through county lines (see below) or being forced to work in a cannabis factory, forced to shoplift, committing vehicle crime or threatening/committing serious violence to others. Children can become trapped in a cycle of criminal activity as perpetrators can threaten their families with violence, or entrap and coerce the child into debt. The experiences of boy victims may be very different to those of girl victims

- Possible indicators of CSE and CCE
- Having unaffordable/unexplained gifts or new possessions or expensive habits (alcohol, drugs)
- Going to hotels or other unusual locations to meet friends
- Getting in/out of different cars driven by unknown adults
- Going missing from home or care or coming home late
- Associating with other young people involved in exploitation
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Changes in emotional well-being
- Drug or alcohol misuse
- Unexplained injuries
- Further indicators of CSE include
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections, inappropriate sexual or sexualised behaviour or pregnancy

County lines is where gangs and organised criminal networks transport illegal drugs both locally and across the UK. Children and vulnerable adults are exploited to move, store and sell drugs and transport money sometimes from urban areas to suburban and rural areas, market and seaside towns. The threat of violence to the victim and their families can be used to trap the victim in continued criminality.

Possible indicators of County line involvement (in addition to some of the indicator mentioned for CSE and CCE) include :

Victim is missing from home and subsequently found in area away from home or in accommodation to which they have no connection

As a victim or perpetrator of serious violence (e.g. knife crime)

In possession of more than one phone and receiving multiple calls requesting movement of drugs or money

### Peer-on-peer/ child on child abuse

Children can abuse other children. This is generally referred to as peer-on-peer abuse and can take many forms and can happen both inside and outside of school or college and online. 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.

Peer on peer 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 peers;
- 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);
- 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;
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; deliberately brushing against or interfering with someone’s clothes (this may cross into sexual violence), displaying pictures, photos or drawings of a sexual nature
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting , which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Information regarding the definition and signs of further safeguarding issues including homelessness, modern slavery, cybercrime, children with family members in prison and children and the court system etc can be found in Annex B of Keeping Children Safe in Education 2021.

## Appendix 2

### Statutory Guidance, legislation and advice includes:

- The Children Act 1989 & 2004
- The Education Act 2002 (section 175)
- The Education (Pupil Information) (England) Regulations 2005
- Keeping Children Safe in Education (September 2021)
- Dealing with Allegations of Abuse Against Teachers and Other Staff
- Working Together to Safeguard Children (2019)
- Sexual violence and sexual harassment between children in schools and colleges (May 2018)
- Searching, screening and confiscation (January 2018)
- What to do if you're worried a child is being abused (March 2015)
- Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
- Domestic Abuse Act 2021
- Designated teacher for looked-after and previously looked-after children (February 2018)
- UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017)
- Procedures set out by the Greenwich Safeguarding Children Partnership.
- Children Missing Education, September 2016
- London Child Protection Procedures and Practice Guidance March 2020
- Children & Families Act, 2014
- Relationships Education, Relationships and Sex Education (RSE) and Health Education, April 2019
- NSPCC – When to call the police

Note: All staff must read and be assisted to understand and discharge their roles and responsibilities set out in Part one of Keeping Children Safe in Education.

Annex A provides a condensed version for staff who do not work directly with children.

### Other useful documents include:

Ofsted: Inspecting safeguarding in early years education and skills

## Appendix 3: Record Keeping and Referral Guidance

It is essential that school keeps clear records based on observation and evidence, which separate fact, allegation, hearsay, opinion or unsubstantiated evidence and which clearly indicate decisions and actions taken.

Child protection information will be kept in separate files (these may be electronic) by the designated teacher and will only be discussed with staff on a need to know basis. Staff need to know when a child is at risk and what plan has been decided by case conference but may not need to know all the confidential details.

All records, notes and observations made by class staff as part of ongoing monitoring of children on the child protection register or causing concern, must be completed on the appropriate incident/concern form and immediately handed/forwarded to the DSL. Documents (paper copy and electronic) must be dated and an indication of the person completing the form recorded.

All child protection conference minutes must be stored in the confidential files kept by the Designated Safeguarding Lead.

### Initial Concerns

Initial concerns, incidents or disclosure by a child must be reported to the DSL using the incident/concern form. A copy of the form and body map in Appendix 4 should be used to record injuries/marks/bruises.

The following information must be recorded:

- time, date, place and people who were present
- exact details of what was said by the child and/or others (no interpretation or opinion)
- the child's emotional or physical condition
- details of the behaviour(s) causing concern and the context in which it occurred

Details of injuries, marks or bruises - the position of these must be marked on the appropriate body drawing and suitably annotated to provide further detail (number, length of marks, description of marks, colour of marks/bruises etc.). Other relevant details - including information about previous incidents which may not have been reported but now seem relevant

### Ongoing Concerns/Monitoring

- A chronology should be maintained
- Staff in regular contact with a child may be required to keep a running record noting information about particular aspects of a child's behaviour, physical and/or emotional condition or remarks they may make - either because concerns are ongoing or as part of a child protection plan. These need to be written on yellow incident sheets and handed to the DSL. Any records passed to the DSL electronically must be password protected.

### Referrals

The DSL must keep detailed, contemporaneous notes of:

- discussions with staff
- discussions with the child
- discussion with parents
- information provided to social services
- decisions taken (with times, dates and signed)
- The designated teacher will confirm verbal and telephone referrals to social services in writing within 48 hours of the referral.

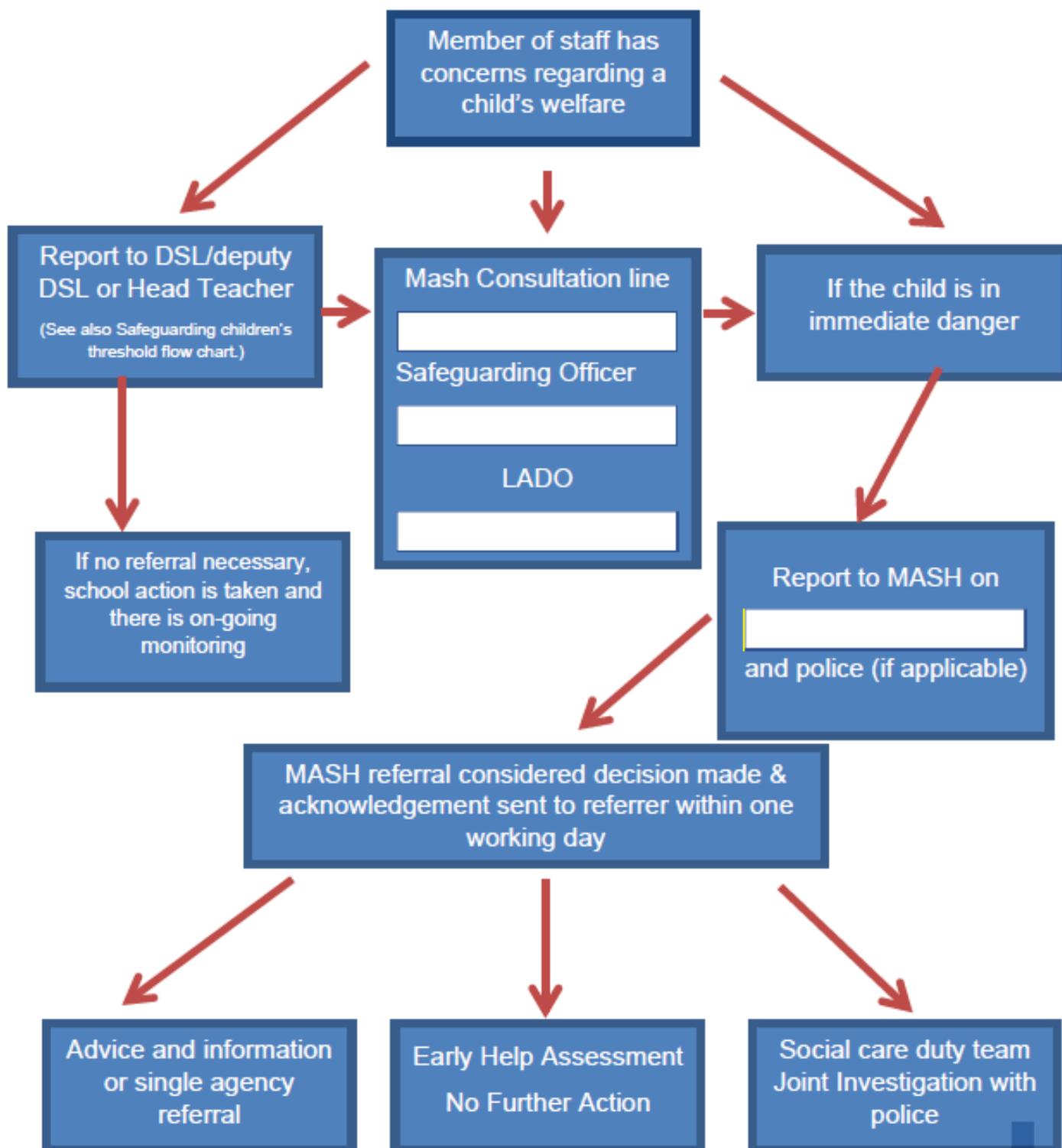
### Reports for Child Protection Conferences/Core Group Meetings

Reports for child protection conferences must be written on the agreed pro-forma. They should focus on the child's educational progress and achievements, attendance, behaviour, participation, relationships with other children and staff and, where appropriate, their appearance and concerns.

They should provide clear factual information. Staff should be aware that these reports will be made available to parents at the child protection conference.

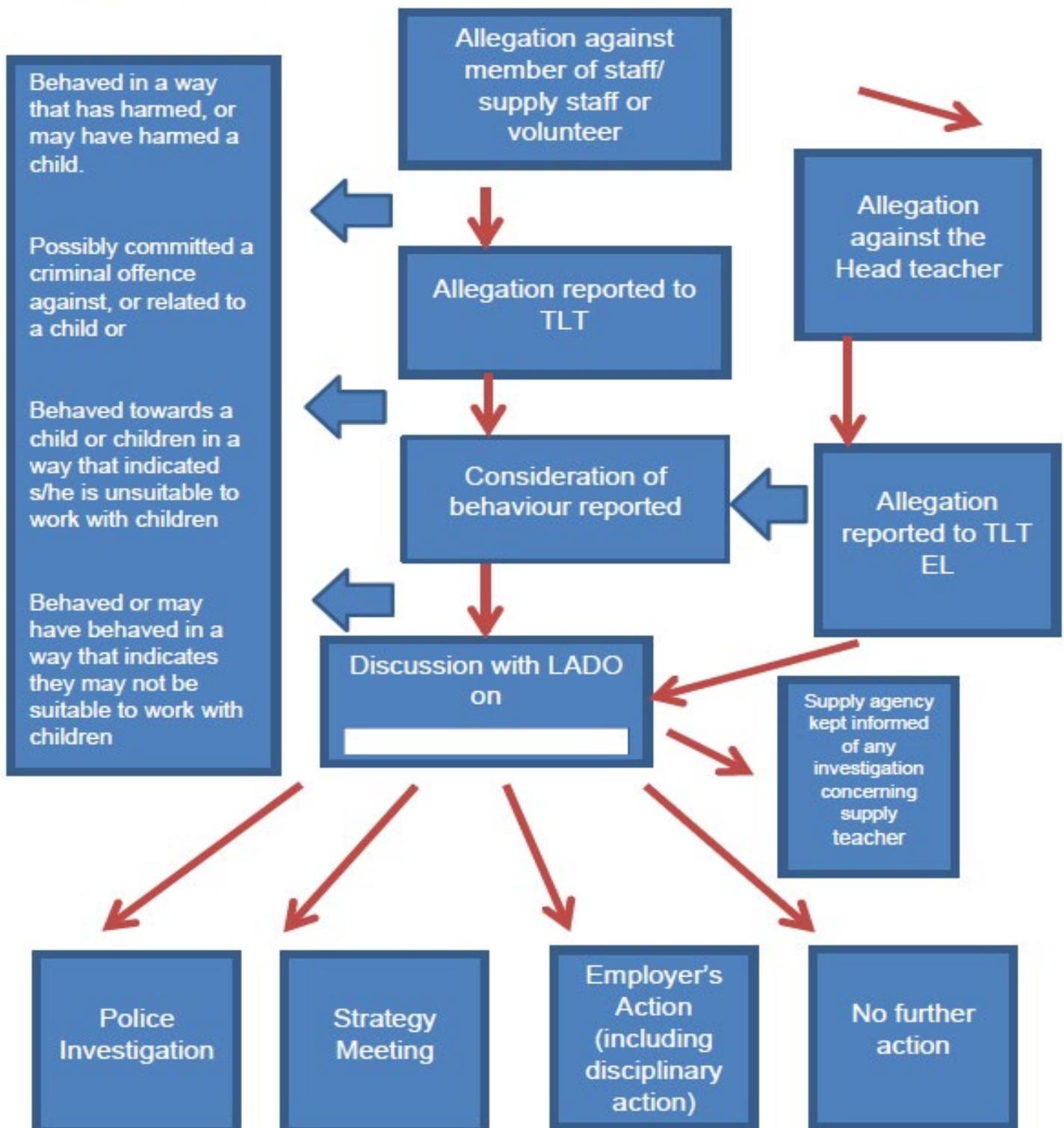
### Appendix 3 continued: Reporting concerns about a child

#### Flow Chart for Reporting Concerns



**Appendix 3 continued:  
 Reporting allegations against school staff, supply staff and volunteers**

**Managing Allegations against staff, supply staff and volunteers**





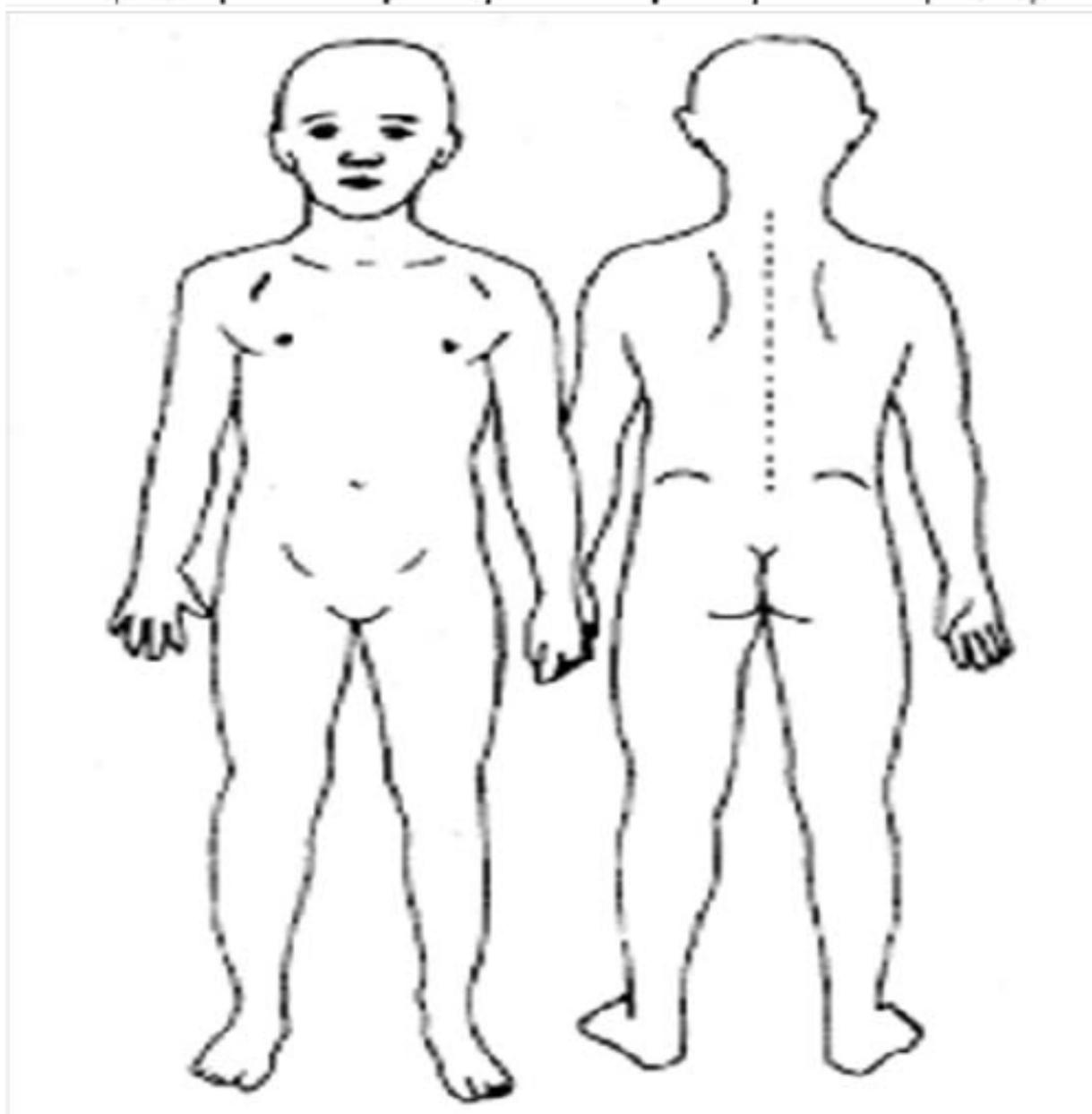


## Body Chart

Once completed attach this body chart to the Concern Form

This chart must be used together with the Concern Form Show clearly the location of your concern and label with a number and a brief description, e.g. '1. Burn about 4cm.' On the Concern Form refer to the injury using the same number and description.

Child's Name \_\_\_\_\_



Observations made by \_\_\_\_\_ Signed \_\_\_\_\_ Date \_\_\_\_\_

Signs and symptoms of physical injury can be indicators of abuse, however there may be other reasons they are not fail-safe mechanisms. **Red indicates a possible non-accidental injury. Green is the more usual sites for accidental injuries.**

## Common Sites

### Non-accidental

- eyes
- ears
- mouth
- neck
- shoulder
- chest
- upper arms
- inner arms
- stomach
- hands (backs)
- genitals
- thighs
- buttocks

### Accidental

- crown
- forehead
- bony spinal protuberances
- elbow
- iliac crest (hip)
- hands (palms)
- knees
- shins

