



13.3 SAFEGUARDING & CHILD PROTECTION POLICY & PROCEDURES 2024-25

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1. Purpose and Aims

The purpose of the Alpha Academies Trust’s Safeguarding policy is to ensure we:

- **Are committed** – to develop a robust culture of vigilance and challenge.
- **Build resilience** – by raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe.
- **Establish a safe environment** – in which children can learn and develop within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- **Support vulnerable pupils** –who have been abused, have witnessed violence towards others or may be vulnerable to abuse.
- **Prevent unsuitable people** – from working with children by ensuring we practice safe recruitment in checking the suitability of all Trust staff, supply staff and volunteers to work with our children. And to maintain an active vigilance thereafter in line with the safeguarding culture.

Our aim is to follow the procedures set out by Staffordshire Safeguarding Children’s Board, Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2024 by knowing and understanding that:

- Safeguarding and promoting the welfare of children is everyone’s responsibility, and the voice of the child is evident.
- Everyone who comes into contact with children and their families has a role to play.
- Everyone should ensure that their approach is child-centred considering, at all times, what is in the best interests of the child.
- By establishing a safe environment, we enable our children to learn and develop within an ethos of openness.
- No single practitioner can have the 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 children and their families has a role to play in identifying concerns, sharing information and taking prompt action.
- The importance of providing children with a balanced curriculum including PHSE, healthy relationship education, online safety, sexting, peer on peer abuse as well as County Lines, Contextualised issues and Child Criminal Exploitation. Also supporting this with online activities, enabling them to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Undertaking the role to enable children and young people at the Trust to have best outcomes.
- Ensuring that as a Trust we have awareness of our staff's knowledge and understanding as well as embedding safeguarding, through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of Trust practice.

This policy provides guidance to all adults working within the Trust, whether paid or voluntary or directly employed by the Trust or a third party.

- This policy is available on the Trust website/Academy website and is available on request from the Trust/Academy office. We also inform parents/carers about this policy when their children join the Trust.
- This policy will be reviewed in full by the Trust Board on an annual basis or sooner should legislation/guidance change.
- This policy sets out how the Trust discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at the Trust. Our policy applies to all staff; paid and unpaid, working in our academies, including Trustees/Governors.
- The policy is provided to all staff (including temporary staff, supply staff and volunteers) at the point of induction, alongside the Personnel Code of Conduct.
- The Trust, working with the Senior Leadership Team and Designated Safeguarding Leads (DSL), ensure that those staff who do not work directly with children read at least Part 1 or Annex A (condensed version of Part 1) of the KCSIE 2024 guidance.
- All staff who work directly with children, are provided and read Part One of Keeping Children Safe in Education 2024.
- The Trust follows the Stoke-on-Trent Safeguarding Children's Board policies and procedures.

2. Ethos

The child's welfare is of paramount importance, we are a child centred Trust and make all efforts possible to capture the voice of the child and to try and understand what their daily lived experiences are like.

We all have a statutory duty to safeguard and promote the welfare of children and to maintain a professional attitude of **it could happen here** where safeguarding is concerned.

The Trust is committed to safeguarding children and promoting children's welfare and expects all staff, Trustees/Governors, volunteers, and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act without delay to protect children by reporting anything that might suggest a child is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours, that underpins this commitment. The Trust seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over time and are evidenced by building up a picture of harm; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the Designated Safeguarding Lead to build up a picture and access support for the child at the earliest opportunity (See Appendix 5).

3. Key Principles

The Trust recognises that scrutiny, challenge, and supervision are key to safeguarding children.

The Trust have a robust **Safeguarding training schedule** for all staff, which is monitored by the Senior Strategic Lead. All staff receive Level 1 Safeguarding training, as required in KCSIE 2024, and receive regular updates through staff meetings, briefings, emails etc. to develop and support robust safeguarding practices amongst all staff.

The Trust has **clear induction processes** for all staff, volunteers and Trustees/Governors, and all required documents and policies are provided both at induction of new staff, and on a yearly refresh basis for current staff. These documents include Part 1 of KCSIE 2024, Personnel Code of Conduct; Student Behaviour Policy; Trust's response to children who go missing from education, the role of the DSL and this Safeguarding Policy as well as child on child abuse and child on child sexual violence and sexual harassment.

All staff, but especially the Designated Safeguarding Lead/Deputies at the Trust will 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 and serious youth violence.

The Trust is committed to **working with other agencies** to provide early help for children before they become at risk of harm or require a 'child in need' statutory assessment.

The Trust will work in partnership with other agencies to promote the welfare of children and protect them from harm, including the need to share information about a child to safeguard them. The Trust will follow the Stoke on Trent Children's Safeguarding Partnership's procedures and provide them with information as required.

All staff should be aware of the **local early help process** and understand their role in it. This includes liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment' (DfE 2018).

All staff should be aware of the **process for making referrals to children's social care** and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.

All staff have equal responsibility to **report their concerns** about a child or the behaviour of any adult without delay to the Designated Safeguarding Lead or via My Concern (our safeguarding and child protection database). Whilst the Designated Safeguarding Lead will normally make referrals to Children's Services, any staff member can refer their concerns to children's social care 'Child and Advice' service (ChAD) on 01782 235100.

Everyone has responsibility to escalate their concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm.

The Trust understands its responsibility to request a statutory assessment lead by a social worker for any child in need, as defined under the Children Act 1989, who is unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services.

Children have a right to learn ways to keep themselves safe from harm and exploitation. We will provide opportunities for pupils/students to develop skills, concepts, attitudes, and knowledge that promote their safety and well-being.

Safeguarding issues will be addressed through the **PSHE curriculum**, for example self-esteem, emotional literacy, assertiveness, power, consent, coercion, control as part of healthy relationship education (previously known as sex and relationship education SRE), online safety (formally known as e-safety), sexting/sharing nudes and bullying (including cyber bullying).

Relevant issues will be addressed through all areas of the curriculum.

All our policies, which support our ethos of safeguarding, will be interlinked with this Safeguarding Policy.

4. Legislation and Guidance

Trusts must have regard for the DfE statutory guidance 'Keeping Children Safe in Education (DfE2024).

Keeping Children Safe in Education 2024

This guidance 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 and
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The 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 Principal should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our Academies 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.

For our Primary Academies:

- 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.

All staff must read and understand at least part 1 of Keeping Children Safe in Education 2024

Keeping Children Safe in Education (KCSIE), is organised into five parts:

- **Safeguarding information for all staff** – safeguarding and promoting the welfare of children is everyone's responsibility, all staff, supply teachers, volunteers and contractors. This part details what Academy staff should know and do with regard to safeguarding.
- **The management of safeguarding** – this part is for Principals, Designated Safeguarding Leads (DSL) and teams, and Governors. It also outlines the responsibilities of governing bodies, proprietors and management committees.
- **Safer recruitment** – this part refers to the recruitment processes including:
 - Advertising
 - Applications
 - Shortlisting
 - Interviewing
 - Selection
 - Pre-employment checks
 - Record keeping.
- **Safeguarding concerns raised** about, and allegations made against, staff, also including supply teachers, volunteers and contractors.
- **Child-on-child sexual violence and sexual harassment** – this part should be read alongside the DfE's advice on sexual violence and harassment between children.

There are also a number of annexes:

Annex A – is a condensed version of part 1 that can be read by staff who don't work directly with children.

Annex B – includes detailed guidance on specific safeguarding issues, such as:

- Child abduction and community safety incidents
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- County lines
- Children and the court system
- Children missing from education
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern slavery and the national referral mechanism
- Preventing radicalisation
- Sexual violence and sexual harassment between children
- Serious violence
- So-called honour-based abuse.

Annex C – sets out the role of the Designated Safeguarding Lead (DSL).

Annex D – host families, homestay during exchange visits.

Annex E – statutory guidance, regulated activity (children), supervision of activity with children which is regulated activity when unsupervised.

Annex F – sets out substantive changes made by the new guidance.

Local Authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, to

enable them to decide whether they should take any action to safeguard and promote the child's welfare. There may be a need for immediate protection whilst the assessment is carried out.

A child in need is defined under the Children Act 1989, as a child who is unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services; or a child who is disabled. A social worker will lead and co-ordinate any assessment under section 17 of the Children Act 1989.

Section 175 of the Education Act 2002 places a duty on local authorities (in relation to their education functions, and governing bodies of maintained schools and further education institutions, which include sixth-form colleges) **to exercise their functions** with a view to safeguarding and promoting the welfare of children who are pupils at a school, or who are students under 18 years of age attending further education institutions.

The same duty applies to independent schools (which include Academies and free Trusts) by virtue of regulations made under section 157 of the same Act.

5. Definitions

Safeguarding and promoting the welfare of children means:

- . Providing help and support to meet the needs of children as soon as problems emerge.
- . Protecting children from maltreatment, whether that is within or outside the home, including online.
- . 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.
- . Promoting the upbringing of children with their birth parents or otherwise their family network through a kinship care arrangement whenever possible and where this is in the best interests of the children.
- . Taking action to enable all children to have the best outcomes set out in the Children's Social Care National Framework.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 4 explains the different types of abuse.

Neglect is a form of abuse and 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. Appendix 4 defines neglect in more detail.

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.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children 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)
- . A clinical commissioning group for an area within the LA
- . The chief officer of police for a police area in the LA area.

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.

6. Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We 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 radicalization.
- . 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 absent from education.
- . Whose parent/carer has expressed an intention to remove them from the Academy to be home educated.

7. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the Academies and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended Academy and off-site activities.

The Academy 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 and sexual violence/harassment. This will be underpinned by our:

- . Behaviour policy
- . Pastoral support system
- . Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - o Healthy and respectful relationships.
 - o Boundaries and consent.
 - o Stereotyping, prejudice and equality.
 - o Body confidence and self-esteem.
 - o How to recognise an abusive relationship (including coercive and controlling behaviour).
 - o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
 - o What constitutes sexual harassment and sexual violence and why they're always unacceptable.

7.1 All Staff

Staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

All 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 at the beginning of 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 LGBT to speak out and share their concerns.

All staff will be aware of:

- . **Our systems which support safeguarding**, including this Child Protection and Safeguarding policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputies, the Behaviour policy, Online Safety policy and the Safeguarding Response to Children who go Missing from Education.
- . **The early help assessment process** 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 the Academy 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.

7.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is [name/job title of individual]. The DSL takes lead responsibility for child protection and wider safeguarding in the Academy.

During term time, the DSL will be available during Academy hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the [deputy/deputies] – [name(s) or job title(s) of deputy/deputies] – will act as cover. If the DSL, Safeguarding Manager and [deputy/deputies] are not available, please contact your Principal. Paula Smith (Trust Senior Strategic Lead) will act as cover if none of these are contactable.

The DSL will be given the time, funding, training, resources and support to:

- . Provide advice and support to other staff on child welfare and child protection matters.
- . Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- . Contribute to the assessment of children.
- . Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- . Have a good understanding of harmful sexual behaviour.

The DSL will also:

- . Keep the Principal informed of any issues.
- . Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- . Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the Trust's policies.
- . Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- . Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- . Undergo the appropriate Safeguarding Training to provide them with the knowledge and skills to carry out their role. This training should be updated at least every 2 years, in line with the Stoke on Trent Safeguarding Children's Partnership requirements.
- . Liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children 2023.
- . The DSLs will refer cases to the Channel programme where there is a radicalisation concern as required, and support staff making Prevent referrals to the Channel programme
- . The DSLs (if the Principals) will refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
- . The DSL will refer cases where a crime may have been committed to the Police as required.
- . The DSLs monitors the electronic case management systems, 'My Concern', to record concerns about children and young people ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately.

- . DSLs have a clear system for Child Protection (section 47), Child in Need (section 17), Early Help Assessment (EHA) files being removed from Trust and returned for the purposes of case review meetings, Rapid Reviews, Child Safeguarding Practice Reviews (CSPR) and DHR (Domestic Homicide Reviews).
- . DSLs help to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children (including children with or who have previously had a Social Worker) are experiencing, or have experienced, with teachers and Academy leadership staff. DSLs ensure systems are in place to induct new staff/Trustees/Governors is robust and monitored and non-compliance shared with Senior Leadership Team/Governance body. DSLs ensure induction policy is updated annually in-line with Keeping Children Safe in Education.
- . Designated Safeguarding Lead/Trustees/Governing Body/Principal all encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Trust may put in place to protect them. DSL has developed systems to record these and ensure through case reviews the children's voice have been heard/recorded and they have a child-centred approach.
- . DSLs will liaise with the Principal to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- . DSLs notify children's social care if a child with a child protection plan is absent for more than two days without explanation.
- . DSLs as required, liaise with the "case manager" and the LADO (designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member).
- . DSLs will liaise with all staff (for example, pastoral staff, nurses, SEN staff and Mental Health Leads) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. The DSLs act as a source of support, advice, and expertise for staff. Risk assessments/safety plans will be completed as required and should, where appropriate, involve other agencies, these are reviewed regularly.
- . DSLs, where a parent chooses to remove their child/ren from an Academy to receive EHE (Elective Home Education), will make arrangements to pass any safeguarding concerns and the safeguarding file if there is one, to the EHE Team within The Stoke on Trent City Council and inform other professionals who may be involved with that child. EHE email; electivehomeeducation@stoke.gov.uk or to refer to the EWO's after they have been missing for over 5 days but not yet the 20.

7.3 The Governing Board

The Governing Board 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.
- . Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation.

- . Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our Academies' local multi-agency safeguarding arrangements.
- . Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full Governing Board. This is always a different person from the DSL.
- . Make sure:
 - o The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
 - o Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
 - o The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
 - o The Trust 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 10 of this policy covers this procedure.
 - o That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
 - o Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the Academy roll):
 - o Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
 - o Make sure there are arrangements for the body to liaise with the Academy about safeguarding arrangements, where appropriate.
 - o Make sure that safeguarding requirements are a condition of using the Academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate (see Appendix 10).

All Governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how Governors are supported to fulfil their role.

Local Governing Bodies ensure that each Academy is compliant with their 175/157 audit return to the Local Authority/Staffordshire Safeguarding Children Board. Any areas of concern in safeguarding are identified and a safeguarding action plan is developed. The Governing Body ensures that each Academy contributes to inter-agency working in-line with Working Together to Safeguard Children (2018).

The Local Governing Bodies have an overview of training schedule and future training requirements. All staff, volunteers and Governors have received an induction which includes regular updated safeguarding training compliant with SOTCSP including online safety.

The Trust Board ensures Safer Recruitment Procedures, that include the requirement for appropriate checks in line with national guidance, are followed.

The Trust board ensures that all Academies are safeguarding compliant.

The Trust Board will ensure there are appropriate policies and procedures in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

The Trust Board have ensured that there is a current Whistle Blowing Policy and staff have received a copy and had the opportunity to raise concerns. There is a culture in our setting where staff can raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with agreed Whistle Blowing Procedures.

Further guidance on [whistle blowing](#) can be found at this link. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call on 0800 028 0285 and the line is available from 8am to 8pm, Monday to Friday. Email: help@nspcc.org.uk

7.4 The Principal

The Principal is responsible for the implementation of this policy, including:

- . Ensuring that staff (including temporary staff) and volunteers:
 - o Are informed of our systems which support safeguarding, including this policy, as part of their induction.
 - o Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- . Communicating this policy to parents/carers when their child joins the Academy and via the Academy website.
- . Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- . Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of the training regularly.
- . 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 10).
- . Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

Primary Academy Principals:

- . Ensuring the relevant staffing ratios are met, where applicable.
- . Making sure each child in the Early Years Foundation Stage is assigned a key person.

7.5 Designated Teacher for Looked After and Previously Looked After Children

The Governing Body have appointed a Designated Teacher (DT) (In non-maintained trusts an appropriately trained teacher should take the lead) and this teacher works with the local authority and parents/carers to promote the educational achievement of registered pupils in our setting, who are 'looked after'.

The Designated Teacher at the Discovery Academy is: Lesley Guard

The Designated Teacher at the Excel Academy is: Nikki Jones

The Designated Teacher at Maple Court Academy is: Claire Steele, Natalie Robson

The Designated Teacher at Eaton Park Academy is: Denise Jones

The Designated Teacher at Sneyd Academy is: Rosina Lee

The Designated Teacher at Holden Lane is: *To be confirmed 2024/25*

The Designated Teachers will work across the Trust to promote and improve educational outcomes for children in care using evidence-based interventions. This being children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care, outside of England and Wales. They are appropriately trained and have the relevant qualifications, training, and experience. They are in a leadership role and can make decisions on behalf of the Trust to implement plans to support children in care.

The Trust are attachment aware and trauma informed and take a relational based approach to supporting our most vulnerable children and will work restoratively with children to improve their outcomes.

The Designated Teacher works with the Virtual Trust, to provide the most appropriate support, utilising the pupil premium plus, to ensure that they meet the needs identified in the Child's Personal Education Plan (PEP). They also work with the virtual Trust head, to promote the educational achievement of previously looked after children.

Our Trust will admit any children in care without delay and work restoratively avoid exclusions for our most vulnerable children. We will make reasonable adjustments to the Student Behaviour Policy to support children in care and contact the Virtual Trust when a child is at risk of exclusion. Where a short period of exclusion is unavoidable, we will provide 1st day provision.

Care Leavers: - The Designated Teacher has the details of the Local Authority Personal Advisor who has been appointed to guide and support the care leaver and liaises as necessary regarding any issues of concern affecting the care leaver.

7.6 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

8. Confidentiality

- . 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 Academy not to tell anyone about the sexual violence or sexual harassment:
 - o 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.
 - o The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
 - o 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:
 - o 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.
 - o 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.
 - o Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- . The government 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 6.

9. Working with Parents and Carers

The Trust are committed to working in partnership with parents/carers to safeguard and promote the welfare of their children, and to support them to understand our statutory responsibilities in this area. The Trust follows legislation that aims to act in the best interests of the child.

When new pupils join our Trust, parents and carers will be informed that we have a Safeguarding policy. A copy will be provided to parents on request and is available on the Trust/Academy's website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to the relevant local authority or other agencies.

We are committed to working with parents in a positive, open and transparent way. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a child from harm. We will seek to share with parents/carers any concerns we may have about their child before making a referral, unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the Trust has about a child will not prevent the Designated Safeguarding Lead making a referral to the relevant local authority in those circumstances where it is appropriate to do so.

To keep children safe and provide appropriate care for them, the Trust requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and **at least 2 contacts**.
- Full details of any other adult authorised by the parent to collect the child from Trust (if different from the above).
- Any legal or criminal changes which effects parental responsibility, for example, bail condition, court orders, Multi Agency Risk Assessment Conference (MARAC).

The Trust will retain this information on the pupil file. The Trust will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the Trust has been supplied with the adult's full details in writing.

10. Stoke on Trent Early Help

Any Child may benefit from Early Help, but all Trust/college staff are particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether they have a statutory Education, Health and Care Plan or not).
- Is a young carer.
- Is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently missing or goes missing from an Academy, care or from home.
- Is at risk of modern slavery, trafficking, or exploitation.
- Is at risk of being radicalised or exploited.
- Is in family circumstances that presents challenges for the child, such as drug or alcohol issues, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is a privately fostered child.

The Designated Safeguarding Lead will ensure that all staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

Every member of staff, including volunteers, working with children at our Trust are advised to maintain an attitude of 'professional curiosity and respectful uncertainty' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child and have a responsibility to act as outlined in this policy.

Practitioners should complete the Stoke on Trent Early Help Assessment (EHA) when:

- Age appropriate progress is not being made and the causes are unclear.
- The support of more than one additional agency is needed to meet the child or young person's needs.
- Children do not meet threshold, yet concerns are emerging for example, attendance, behavioural, academic progress, change in behaviour.

Guidance documents can be accessed at the following links:

- Stoke Early Help [Stoke on Trent Early Help](#)
- Stoke on Trent Threshold Document [Stoke on Trent threshold Document](#)
- The establishment EHA lead may need to make a referral directly to other agencies or request the support of Stoke on Trent City Council Early Help Teams. Referrals will be made through Stoke on Trent's Children's Advice and Duty service (ChAD) on 01782 235100.

The DSL may also consider seeking advice and guidance from Stoke on Trent Children's Advice and Duty Service (ChAD) 01782 235100 around thresholds and appropriate referrals to ChAD.

Concerns about a child should always lead to help for a child. The Trust may need to escalate it's concerns with Children's Services to ensure a referral is accepted or work with other agencies to ensure that an Early Help Assessment is completed.

11. What Happens after a Referral is Deemed Necessary to Escalate Beyond Early Help

Child in Need (Section 17)

If the DSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will speak with parents/child and obtain their consent for referral to Stoke on Trent's Children's Advice & Duty (ChAD) service or the appropriate social care team if a different authority, to request an assessment. If parents refuse to give consent, but the child's needs are not being met, the DSL will discuss these issues with the Stoke on Trent Children's Advice and Duty (ChAD) service on 01782 235100. Appropriate Trust staff should be invited to participate in Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require Section 17 services.

Child Protection (Section 47)

If the Local Authority have reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they have a duty to make enquires under Section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare.

This duty also applies if a child is subject to an emergency protection order (under section 44 of the Children Act 1989) or in police protective custody under section 46 of the Children Act 1989.

Children's Services will convene an Initial Child Protection Conference (ICPC) once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference (RCPC) will take place once a child has been made the subject of a Child Protection Plan to monitor the safety of the child and the required reduction in risk. Between conferences regular meetings of a core group will take place to monitor the progress of the child protection plan.

The DSL, and sometimes other staff members, will attend a child protection conference on behalf of the Trust in respect of individual children.

The person attending will have as much relevant and up to date information/case files about the child as possible; any member of staff will be required to contribute to this process. The person attending will contribute to a recommendation on the risks/protective factors for the family from their information and a view on the need for a child protection plan. If we cannot attend, then we ensure that a report is sent prior to the conference.

Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open, honest, and transparent way with any parent whose child has been referred to Stoke on Trent's Children's Advice and Duty service or whose child is subject to a child protection plan.

Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents/carers.

11.1 Escalation Procedure

The Stoke on Trent Safeguarding Children Partnership expects members of staff working directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues within agencies and between agencies provides a healthy approach to the work.

If we believe that concerns regarding a child are not being addressed, we understand the expectations that we will commence the escalation process be used until a satisfactory conclusion is reached.

The process of resolution will be kept as simple as possible and the aim will be to resolve difficulties at a professional practitioner level, wherever possible and always in a restorative way.

We recognise that differences in status and experience may affect the confidence of some workers to pursue this course of action, and support should be sought from the DSL.

Guidance [Escalation Procedure](#)

12. A Safer Trust Culture

12.1. Safer Recruitment and Selection

The Trust pays full regard to 'Keeping Children Safe in Education 2024'. Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity (best practice being birth certificate), checking academic or vocational qualifications, obtaining professional references (character on occasions), checking social media and online behaviours, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks and prohibition checks and if they have been disqualified from providing childcare along with any relevant overseas information. Evidence of these checks is recorded on our Single Central Record.

Staff who have lived or worked outside the UK will undergo the same checks as all other staff, even if they have never been to the UK. We will ensure that any other appropriate checks are carried out so that any relevant events that occurred outside the UK can be considered. These checks could include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

Guidance: [Application process for criminal records checks overseas](#)

[Regulated professions database](#)

[UK Centre for Professional Qualifications](#)

Separate barred list checks are only be carried out in the following circumstances:

- For newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 213 have been carried out).

Recruitment materials will include reference to the Trust's commitment to safeguarding and promoting the wellbeing of pupils.

Specific SLT members and Governors have undertaken appropriate training in Safer Recruitment.

12.2. Induction

All staff must be aware of systems within the Trust which support safeguarding, and these should be explained to them as part of staff induction. This should include:

- The Safeguarding Policy.
- The Behaviour Policy.
- The Staff Code of Conduct
- The Safeguarding response to children who go missing from education; and
- The role of the DSL (including the identity of the DSL and any deputies).
- At least part one of KCSIE 2024.

If staff, supply staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in the buildings, who they are with and for how long. Doors should have a clear glass panel in them and be left open. No visitors, volunteers or parent helpers are ever to be left unsupervised with children or out of sight of the teacher or member of staff in charge. It is the responsibility of the member of staff to ensure this is the case.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

12.3. Staff Support

We recognise the stressful and traumatic nature of safeguarding and child protection work. We will support staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate.

Regular supervision will be offered to the Lead DSL and may be extended to other members of staff, as deemed appropriate by the Trust Lead for Safeguarding. External Supervision is also available if appropriate.

12.4. Use of Reasonable Force

There are circumstances when it is appropriate for staff in Trust to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This

can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

When using reasonable force in response to risks presented by incidents involving children including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.

By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers, we will reduce the occurrence of challenging behaviour and the need to use reasonable force.

Our Positive Handling information is contained in the Behaviour Policy, with risk assessments if needed. There is also a record which is completed when positive handling has taken place.

12.5. 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.
- . Promote the use of the BIG BLUE BUTTON and the BIG RED BUTTON for accessing staff they feel comfortable with.
- . PSHE and assembly information sharing to let students know how they can report.

13. 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)".

13.1 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 (see section 5.2) as soon as possible if you make a referral directly.

Set out your local procedures for making a referral, as per the arrangements put in place by the 3 safeguarding partners.

13.2 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 on My Concern. 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.

Please see appendix for further details

13.3 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, are set out in appendix 4 of this policy.

Any teacher who either:

- 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.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM should speak to the DSL and write this up on My Concern.

Guidance Documents: -

- [Multi Agency Statutory guidance on Female Genital Mutilation](#)
- [Female Genital Mutilation Act 2003](#)

13.4 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)

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 as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

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.

We 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 Academy 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.

Add details of your local procedures for early help assessments.

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.

Add details of your local procedures for referral and escalation.

13.5 If you have concerns about extremism

Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our Trust's safeguarding approach.

Violent Extremism is defined by the Crown Prosecution Service (CPS) as:

“The demonstration of unacceptable behaviour by using any means or medium to express views which:

- *Encourage, justify or glorify terrorist violence in furtherance of particular beliefs.*
- *Seek to provoke others into terrorist acts.*
- *Encourage other serious criminal activity or seek to provoke others to serious criminal acts.*
- *Foster hatred which might lead to inter-community violence in the UK”.*

Extremism can take many forms including that linked to Far Right / Neo Nazi / White Supremacist, Al Qaeda / Daesh ideologies, Irish Nationalist and Loyalist paramilitary groups and that linked to Animal or Environmental Rights movements. It also includes school massacre ideology and Incel Movements.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

The Trust values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils/students and Trust staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The Trust is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the Trust's safeguarding duty.

The Academies designated safeguarding leads (and any deputies) are aware of local procedures for making a Prevent referral.

As part of wider safeguarding responsibilities academy staff will be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of the Academy, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner schools, local authority services and police reports of issues affecting students in other settings.
- Students voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but no exclusive to, gender, disability, sexuality, ethnicity or culture.
- Attempts to impose extremist views or practices on others.

Our Trust will closely follow any locally agreed procedure as set out by the Local Authority and the Local Safeguarding Children Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

Prevent

The Trustees/Governors, Principals, and the DSL will assess the level of risk within the Trust and put actions in place to reduce that risk. Risk assessment may include consideration of the Trust's RE curriculum, SEND policy, the use of Trust premises by external agencies, integration of students by gender and SEN, anti-bullying policy and other issues specific to the Trust's profile, community and philosophy.

All Trusts are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our Trusts wider safeguarding obligations.

We follow the prevent duty guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

We promote fundamental British values; we create and promote safe spaces to discuss sensitive topics, effecting filtering and monitoring and training for all staff. Our Trust will monitor online activity to ensure that inappropriate sites are not accessed by students or staff. This is best done using specialist online monitoring software, which in this Trust is called 'Smoothwall'.

All Trust staff will undertake Home Office approved WRAP Training (Workshop to Raise Awareness of Prevent) and also sometimes referred to as 'Prevent Training'.

13.6. Reporting online material promoting terrorism or extremism

The internet is used by some people to promote terrorism and extremism. The Trust is committed to ensuring that students are not able to access extremist ideas or materials online in each academy. We will challenge and report any terrorist and extremist content found online which is offensive or illegal.

As private citizens, members of staff can also report such material, anonymously if necessary, by clicking on the button below.



Examples include material such as:

- Articles, images, speeches or videos that promote terrorism or encourage violence.
- Content encouraging people to commit acts of terrorism.
- Websites made by terrorist or extremist organisations.
- Videos of terrorist attacks.

The national Counter Terrorism Internet Referral Unit (CTIRU), which investigates the material, will try to secure the removal of the material as quickly as possible.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Staffordshire Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for Trusts to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.
- Trusts have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Guidance Documents:

- [The Prevent Duty.](#)
- [Educate Against Hate](#)
- [ACT Early | Prevent radicalisation](#)

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 Academy staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email 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.

13.7 Use of external agencies and speakers

We encourage the use of external agencies or speakers to enrich the experiences of our students. However, we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our students.

Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in opposition to, the Trust's values and ethos. We must be aware that in some instances the work of external agencies may not directly be connected with the rest of our academies/establishments' curriculum, so we need to ensure that this work is of benefit to students.

Our academies/establishments will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to students are consistent with the ethos of the Trust and do not marginalize any communities, groups or individuals.
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise students through extreme or narrow views of faith, religion or culture or other ideologies.
- Activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication.
- Activities are matched to the needs of students.
- Activities are carefully evaluated by the academies to ensure that they are effective.

We recognise, however, that the ethos of our Trust is to encourage students to understand opposing views and ideologies, appropriate to their age, understanding and abilities and to be able to actively engage with them in informed debate and we may use external agencies or speakers to facilitate and support this.

Therefore, by delivering a broad and balanced curriculum we will strive to ensure our students recognise risk and build resilience to manage any such risk themselves, where appropriate to their age and ability; but also to help students develop the critical thinking skills needed to engage in informed debate.

13.8 If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

For any secondary age student within the Trust, the Mental Health Screener can be completed by any member of staff and submitted to the Lead for Psychotherapeutic care; Jonathan Beeley (jbeeley@thediscoveryacademy.co.uk). For primary age students, staff must contact the Lead if concerned for mental health and wellbeing to discuss further if all other interventions have been exhausted or indicators displayed are moderate to severe. If a child displays suicidal ideology, an emergency referral to CAMHS must be actioned immediately.

All Trust Academies have Mental Health 1st Aiders. They are:

Discovery: Andrea Rowley

Excel: Caroline Sherratt, Clare Fairclough

Maple: Natalie Robson, Bianca Williams

Eaton Park: Jessica Bell, Julie Oaks, Amanda Sherwin, Chloe Cottis, Shara Monaghan, Hayley Birch

Sneyd: Rosina Lee & Amy Jenkins

Holden Lane: *To be confirmed 2024/25*

The Academy websites have further information and guidance available to students and we promote the use of the BIG RED BUTTON to any child to contact an Academy if needed.

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 (ACE), 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.

Guidance and helpful documents: -

- Addressing Trauma and Adversity
- Mental Health and Behaviour in Trusts Guidance.
- Preventing and tackling bullying
- PHE Rise Above for Trusts programme.
- Every Interaction Matters
- Education recovery
- MIND-Parenting Capacity and Mental Health
- NSPCC-Mental Health and Parenting
- SSCB-Children & Young People who Self Harm or Disclose an Intent to Die by Suicide

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and by speaking to the designated safeguarding lead or a deputy.

13.9 Concerns about a staff member, supply teacher, volunteer or contractor

Our aim is to provide a safe and supportive environment securing wellbeing and best possible outcomes for the children at the Trust. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

The Trust Board ensures that there are procedures in place for dealing with the two sections covering two levels (see below) of concern and/or allegations against staff members, supply staff, volunteers, and contractors.

- Allegations that may meet the harms threshold.
- Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as ‘low level concerns’.

Allegations that may meet the harms threshold

We follow KCSIE 2024 guidance where it is alleged that anyone working in our education setting providing education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- Behaved in a way that has harmed a child or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates 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 relates to members of staff, supply staff, volunteers, and contractors, who are currently working in any education setting, regardless of whether the Trust or college is where the alleged

abuse took place. Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police.

Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The Governing Body will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the Trust, whilst they carry out their investigation.

We take all possible steps to safeguard our children and to ensure that the adults in our Trust are safe to work with children. We ensure that the procedures outlined in *Staffordshire Safeguarding Children's Board Protocol: Managing Allegations of abuse Against Persons who work with Children and role of LADO* and Part 4 of '*Keeping Children Safe in Education*', DfE (2024) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). Tel 01782 235100.

If an allegation is made or information is received about an adult who works at The Trust which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Principal immediately. Should an allegation be made against the Principal, this will be reported to the Chair of the Governing Body.

If neither the Principal nor Chair of Governing Body is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Principal or the Vice Chair of Governors.

The Principal or Chair of Governors will seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'.

We are aware that concerns may arise in several ways and from several sources, for example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of our setting; or as a result of vetting checks undertaken.

Low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. Low level concern is still a concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the Trust may have acted in a way that:

- Is inconsistent with the Personnel Code of Conduct, including inappropriate conduct outside of work.
- and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- Using inappropriate sexualised, intimidating, or offensive language.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Principal or Chair of Governors should contact the LADO directly on 01782 235100. General guidance on [whistle blowing](#) can be found at this link.

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 and the line is available from 8:00am to 8:00pm, Monday to Friday and Email: help@nspcc.org.uk.

The Trust has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our Trust, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service.

13.10 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our Trust’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- . Is serious, and potentially a criminal offence.
- . Could put pupils in the Academy at risk.
- . Is violent.
- . Involves pupils being forced to use drugs or alcohol.
- . Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

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 on My Concern 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 Academy 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.

Creating a supportive environment in the Academy and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- . Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.

- . Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- . Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- . Ensure pupils are able to easily and confidently report abuse using our reporting systems.
- . Ensure staff reassure victims that they are being taken seriously.
- . Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- . Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- . Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- . Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
 - That even if there are no reports of child-on-child abuse in the Academy, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to.
 - A friend may make a report.
 - A member of staff may overhear a conversation.
 - A child’s behaviour might indicate that something is wrong.
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our Academy from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- . Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this.
- . There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

13.11 Sharing of nudes and semi-nudes ('sexting')

'Sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child or young person. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

Not all young people send nudes and semi-nudes but many are asked to send them or receive images and videos of others with or without consent.

Producing and sharing nudes and semi-nudes of under 18s is also illegal, which causes considerable concern in education settings working with children and young people, and amongst parents and carers.

Your responsibilities when responding to an incident:

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.

The Searching, screening and confiscation advice for schools highlights how the Education Act 2011 gives schools the power to search pupils for devices, search data on devices. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate Academy 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 define the incident under one of these categories:

- **aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub-categorised into:
- **adult involved:-** adult offenders (even criminal gangs) attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders. Some offenders may coerce or blackmail the child or young person into sending more images or making a payment (known as financially motivated sexual extortion or ‘sextortion’)¹⁰¹ These are all forms of child sexual abuse. See [Annex A](#) for important additional information on sexually and financially motivated adult involved incidents.
- **youth only – intent to harm:** these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail (including financial), threats or deception, sexual abuse or exploitation by young people.
- **youth only – reckless misuse:** no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.
- **experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
- **romantic:** incidents in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair.
- **‘sexual attention seeking’:** the phrase ‘sexual attention seeking’ is taken directly from the typology however it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image.
- **other:** cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

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.
- 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).
- If the image is an original source and can be sent to the Internet Watch foundation for blocking.
- 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).

DSLs (or an education setting's equivalent) will need to be mindful that behaviour, which may not initially appear to be sexually motivated, may have occurred as a result of risky or harmful behaviour or sexual abuse being 'normalised' for children and young people.

Hackett's 'Continuum of children and young people's sexual behaviours' model can also help practitioners to understand that children and young people's sexual behaviours exist on a wide continuum from normal to abusive and violent behaviours and may move fluidly between each category. It is important to note that an isolated incident that demonstrates problematic or abusive behaviour may not necessarily be indicative of the child or young person's overall sexual behaviour. The incident should be dealt with proportionally to the behaviour being displayed.

Appropriate	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Behaviour accepted by peers within peer group context	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Behaviour accepted by peers within peer group context	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Shared decision-making	Context for behaviour may be inappropriate	Consent issues may be unclear	Intrusive	Sadism
	Generally consensual and reciprocal	May lack reciprocity or equal power	Informed consent lacking or not able to be freely given by victim	
		May include levels of compulsivity	May include elements of expressive violence	

Frameworks such as Brook’s [Sexual Behaviours Traffic Light Tool](#) can also be used to identify when a child or young person’s sexual behaviour is a cause for concern in relation to their development.

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 Principal 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.

The decision to respond to the incident without involving the police or children's social care should only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the education setting's pastoral support and disciplinary framework and, if appropriate, their local network of support.

When discussing the sharing of nudes and semi-nudes, it is important that the DSL (or equivalent) member of staff:

- reassures the child or young person that they are not alone, and the education setting will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process.
- recognises the pressures that children and young people can be under to take part in sharing an image and, if relevant, supports their parents and carers to understand the wider issues and motivations around this.
- remains solution-focused and avoids any victim-blaming questions such as 'why have you done this?' as this may prevent the child or young person from talking about what has happened. For example, use questions such as 'describe what happened' or 'explain to me who was involved'.
- helps the child or young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s).

- discusses issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL or equivalent if this ever happens.
- explains the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them.
- advises the child or young person to use the IWF and Childline's Report Remove tool to report an image that has been shared online: [www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/](http://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety sexting/report-nude-image-online/). NCMEC's Take It Down tool can also be used to help them to anonymously remove nudes or semi-nudes that have yet to be shared online but they think might be (for example, in an incident where a young person has been threatened to have their image shared but threat has not yet been carried out): <https://takeitdown.ncmec.org>. (see [section 2.12](#) for further detail on reporting routes).

Children and young people who have had their nudes or semi-nudes shared publicly should be:

- reassured that they have done the right thing by speaking to an adult and that the education setting and other adults are there to help.
- advised:
 - to - delete images or videos from social media accounts (including from cloud photo backups) if they have uploaded them themselves.
 - to use the IWF and Childline's Report Remove tool to report an image that has been shared online: www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. NCMEC's Take It Down tool can also be used to help them remove or limit the spread of nudes or semi-nudes that have been shared online: <https://takeitdown.ncmec.org>. (see [section 2.12](#) for further detail on reporting routes).
 - on how to report sexual images or videos on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator to have a mobile number changed as this may stop others from contacting them.
 - to speak to the Academy if they are concerned about any bullying behaviour.

Children and young people who have been sent a nude or semi-nude should be:

- reassured that they have done the right thing by speaking out and that the education setting and other adults are there to help.

- asked whether it was sent by an adult or another child or young person and if they requested the photo or if it was sent unsolicited.
- advised:
 - on the importance of reporting it online if it has been shared
 - to delete it from their devices and accounts
 - on the importance of not sharing the image further
 - if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with.

Children and young people who have shared another child's or young person's nudes or semi-nudes should be:

- asked:
 - whether they asked for the photo or were initially sent it without requesting.
 - who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to online service providers (see [section 2.12](#)).
 - about their motivations for sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and not putting pressure on others to take or share nudes and semi-nudes.
- advised on the law on the sharing of nudes and semi-nudes.

Children and young people who have created a nude or semi-nude of another child or young person and shared it should be:

- asked:
 - who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their devices, any social media accounts and anywhere else it has been posted online such as group chats, and reporting it to online service providers (see [section 2.12](#)).

- about their motivations for creating and sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by creating or sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and how it still applies when nude and semi-nude has not been taken by the child or young person in it.
- advised on the law on the sharing of nudes and semi-nudes and how it still applies to digitally manipulated or AI-generated imagery of other children and young people.

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.

In all situations, parents or carers should be:

- given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the education setting.
- given support to deal with their own feelings of upset and concern including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate.
- given support on how to speak to their child about the incident.
- advised on the law around the sharing of nudes and semi-nudes.
- kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- informed about sources of support for their child in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline counsellor online or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999.
- directed to NCA-CEOP if the child or young person discloses any further details to them that may suggest they are being groomed or sexually exploited.

In addition to the advice above, parents and carers should be given the following advice and guidance for specific scenarios.

Parents/carers whose child has had their nudes or semi-nudes shared publicly should be:

- advised to:
 - stay calm and refrain from getting angry with their child.

- help their child delete images from social media accounts (included from cloud photo backups) if they have uploaded them themselves.
- support their child use the IWF and Childline's Report Remove tool to report an image that has been shared online: www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. They can also help their child to use NCMEC's Take It Down tool to help them remove or limit the spread of nudes or semi-nudes that have been shared online: <https://takeitdown.ncmec.org>.
- report sexual images on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator to have a mobile number changed.
- directed to services for Harmful Sexual Behaviour, such as the National Clinical Assessment and Treatment Service (an NSPCC service) or Shore (a Lucy Faithfull Foundation service), if there have been similar incidents or they are worried about inappropriate sexual behaviour for their age.
- advised to speak to the education setting if they are concerned about any bullying behaviour.

Parents/carers whose child has been sent nudes and semi-nudes should be advised to:

- listen to their child's concerns without criticising their decisions.
- consider ways that their child could speak to the sender to stop future correspondences. Alternatively, if the child or young person prefers, informed about how to block the sender.
- discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Children can speak to the Academy and/or parents/carers if this ever happens.

Parents/ carers whose child has shared another child's nudes or semi-nudes should be advised to:

- stay calm and refrain from getting angry with their child.
- discuss issues of consent and trust in healthy relationships or friendships. Talk about the types of things which are and aren't OK to share and how they would feel if someone shared a personal photo of them.
- contact their child's education setting if they are concerned that their child is behaving in a sexually inappropriate way. They could also be directed to services for Harmful Sexual Behaviour, such as the National Clinical Assessment and Treatment Service, if appropriate, or if similar incidents have previously occurred.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the MASH / Children's Social Care.

The NPCC has made it clear that incidents involving sharing nudes and semi-nudes should have an immediate focus on safeguarding children.

In many cases, education settings may respond to incidents without involving the police, for example where an incident can be defined as 'experimental' and there is no evidence abusive or aggravating elements.

The police may, however, need to be involved in some cases to ensure thorough investigation, including the collection of all evidence (for example, through multi-agency checks). **Where there are abusive and/or aggravating factors, incidents should always be referred to the police through the Multi-Agency Safeguarding Hub (MASH)**

Deletion of imagery

If the Academy has decided that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing.

In most cases, children and young people should be asked to delete the imagery and to confirm that they have deleted them. They should be given a deadline for deletion across all devices, online storage, or social media sites. They should be reminded that possession of nudes and semi-nudes is illegal. They should be informed that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved.

Any decision to search a child or young person's device and delete imagery should be based on the professional judgement of the DSL (or equivalent) and should always comply with the safeguarding or child protection policy and procedures of the education setting. All decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to any child or the young person.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

Reporting nudes and semi-nudes online

Reporting routes for children and young people

Children and young people may need help and support with the removal of nudes and semi-nudes from devices and social media, especially if they are distressed. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the child or young person. More information can be found on

individual providers' websites, platforms or apps where they should make public their Terms of Service and process for reporting.

Children and young people can use Take It Down, a tool provided by the National Centre for Missing and Exploited Children (an American child protection organisation), to help them anonymously remove nudes or semi-nudes that they believe have been or could be shared online. They can select the nude or semi-nude on their device and the tool will generate a 'hash' or digital fingerprint that can be used by online platforms such as Snapchat, TikTok and Instagram to identify exact copies of those images or videos. The service can be used even if the child or young person is unsure whether an image has been shared: <https://takeitdown.ncmec.org>

If a child or young person has had their nude or semi-nude shared online, they can use the IWF and Childline's Report Remove tool to report images, videos and URLs at www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. The tool helps them to see if it is possible to get the image removed. This must be done as soon as possible to minimise the number of people that have seen the picture.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images.

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the Academy will follow in the event of an incident.

13.12. Children missing (absent from) education

All professionals working with children, as well as the wider community can help by remaining vigilant to children's safety. The law states every child should be receiving an education and we

stand a better chance of ensuring a child's safety if we know where and how they are receiving this. The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory Trust age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who go missing from education.

A child going missing, particularly repeatedly, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

Each Academy in the Trust will hold two or more emergency contact numbers for each pupil. It is good practice to give our Trust additional options to contact a responsible adult when a child missing education, is also identified as a welfare and/or safeguarding concern.

The Academies will notify the Local Authority of any pupil/student who fails to attend regularly after making reasonable enquiries or has been absent without the Trust's permission for a continuous period of 10 days or more. Each Academy (regardless of designation) will also notify the Local Authority of any pupil/student who is to be deleted from the admission register because s/he:

- Has been taken out of the Academy by their parents and is being educated outside the system (for example elective home education).
- Has ceased to the Academy and no longer lives within a reasonable distance of the Academy at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the Trust of the change).
- Displaced because of a crisis, for example domestic violence or homelessness.
- Has been certified by the Academy medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither parent has indicated the intention to continue to attend the Academy after ceasing to be of compulsory school age.
- Is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe that s/he will return to the Academy at the end of that period; or
- Has been permanently excluded.

The Academies within the Trust will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered 'missing'.

13.13 Child missing from home or care

There are strong links between children involved in criminal and sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children.

Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Guidance document

- [Children who run away or go missing from home or care](#)

13.14. 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 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.

We would use a Risk Factor Matrix to assess risk and submit to MACE panel.

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.

Some of the following can be indicators of CCE:

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

Guidance documents:

- [Safeguarding children who may have been trafficked](#)
- [Child Exploitation - StaffsSCB](#)

Child Sexual Exploitation (CSE)

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

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example, 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, for example they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

Guidance documents:

- [Child Sexual Exploitation Definition & Guidance](#)
- [Know about CSE](#)

13.15. County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including Trusts, further and higher educational institutions, pupil referral units, special educational needs Trusts, children’s homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and Trust), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRF) should be considered. Further information can be found here [National Referral Mechanism](#).

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation: -

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Guidance Document:

- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)

13.16 Domestic abuse

Any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in the Academy (usually the designated safeguarding lead) before the child or children arrive at the Academy the following day. This is the procedure where police forces are part of [Operation Encompass](#).

The DSL will provide support according to the child's needs and update records about their circumstances.

Exposure to 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. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. We will signpost and support our children/young people.

Operation Encompass is an information sharing partnership between Staffordshire Police and Staffordshire and Stoke on Trent educational settings (from Reception through to Higher Education) which allows Trusts to offer immediate support for children and young people experiencing domestic abuse. The Trust is fully committed to this project and work closely with the Local Authority and partners. Further information can be found in Appendix 8.

Guidance Documents:

- [Domestic Violence and Abuse](#)
- [Domestic Abuse-Staffsccb](#)
- [NSPCC-Domestic Abuse](#)

13.17 Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at Trust, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation.

Guidance Documents:

- [NSPCC-Parental Substance Misuse](#)
- [SSCB-Working with parents who misuse substances](#)
- [Drugs Advice for Trusts](#)

13.18 Fabricated or Induced Illness (FII)

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a child's health should be discussed with a health professional who is involved with the child.

Guidance Documents:

- [Safeguarding children in whom illness is fabricated or induced](#)
- [Staffsscb-Fabricated or induced Illness Guidance](#)

13.19 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority, so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Our staff will consider homelessness in the context of children who live with their families, and intervention will be on that basis. However, it is also recognised that in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home and they will require a different level of intervention and support.

Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

13.20 Honour-based abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

It is important to be aware of this dynamic and additional risk factors, when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in

relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

13.21 Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one, entered, without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. The 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). Some perpetrators use perceived culture practices, to coerce a person into marriage. Trusts play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life'. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk.
- Refer the pupil to a school counsellor, as appropriate.

Guidance Document:

- [Forced Marriage](#)

13.22 Online safety

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sexual predation, and technology often provides the platform that facilitates harm.

The Trust realise that it is essential for our children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole Trust approach to online safety which empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms for us 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: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (for example, consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have filters and monitoring systems in place, and these are regulated, and risk assessed as part of the prevent duty.

We have an online safety policy which identifies the usage and expected behaviour of children/pupils. As a Trust we appreciate the value of technology and that appropriate filters are in place (see below), yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding.

As a Trust we also have a Social Networking protocol and Online behaviours are referenced in the Personnel Code of Conduct.

Education at home/Remote learning: - Where children are being asked to learn online at home, our Trust will refer to and use the links and resources provided by the DfE; Safeguarding in Schools, colleges and other providers and Safeguarding in remote education.

The Trust uses 'Smoothwall' to monitor incidents online in our Academies or using the Academies systems.

Students are educated on online safety through the curriculum (IT: Year 7, PSHE: Year 7 Summer 1, Year 8 Spring 1, Summer 1, Summer 2, Year 9 Summer 1, Year 10 Spring 1) and assemblies.

It's essential for adults who work with children and young people of all ages to have ongoing discussions with them about the benefits and risks associated with online activities. This includes:

- Online safety
- Healthy relationships, abuse and consent
- Where to go for help
- How to report unacceptable activity or behaviour.

Filtering and monitoring

Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Trust does all that they reasonably can to limit children's exposure to the above risks from the Trust's IT system.

As part of this process, governing bodies and proprietors ensure our Academies have appropriate filtering and monitoring systems in place and regularly review their effectiveness. We 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. Governing bodies and proprietors 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.

The appropriateness of any filtering and monitoring systems are a matter for the individual Trust and will be informed in part, by the risk assessment required by the Prevent Duty.

To support the Trust to meet this duty, the Department for Education has published filtering and monitoring standards which set out that schools and colleges should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs.

The Trust reviews the standards and discusses with IT staff and service providers what more needs to be done to support Academies in meeting this standard.

The Department for Education's new filtering and monitoring standards (DfE, 2023b), which support the Trust to have effective systems in place has been looked at by The Trust and completed as a series of actions.

In our Trust, the person responsible for Filtering and Monitoring is Ann- Marie Lucy, who manages the RM systems. The DSL takes overall responsibility for online Safety and all our filtering is done by RM and monitoring by Smoothwall. All our Trust staff have had training on Smoothwall and monitoring to the appropriate level.

Smoothwall monitors student and staff usage and our safeguarding teams action misuse. DSLs are responsible for updating and checking on the effectiveness of this system.

If you come across misuse by a student, Smoothwall will pick it up but you will also need to report it on My Concern. If you receive suspicious emails, do not open, and email RM.

Guidance Documents:

- [Children's Commissioner-Online Safety](#)
- [Teaching online safety in education settings](#)
- [Appropriate Filtering and Monitoring](#)
- [CEOP-Safety Centre](#)
- [National Cyber Security Centre](#)
- [NSPCC-Undertaking remote teaching safely](#)
- [PHSE-Advice on addressing coronavirus \(COVID-19\)](#)
- [360 Degree Safe - Online Safety Review Tool](#)
- [UKCCIS-UK Council for Child Internet Safety](#)

13.23 Bullying, including cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (for example, hitting, kicking, theft)
- Verbal (for example, racist or homophobic remarks, threats, name-calling)
- Emotional (for example, isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including sexting)

Guidance on bullying can be found here: [Preventing & tackling bullying](#) [Cyberbullying advice](#)

The Trust has a separate Anti-Bullying policy.

13.24 Private fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a Trust away from their home area.

The staff at the Trust will notify the DSL/DDSL when they become aware of a private fostering arrangement. There is a mandatory duty on the Trust to inform Stoke on Trent Children's Services of a private fostering arrangement by contacting ChAD on 01782 235100, who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Guidance Document:

- [Children Act 1989 – Private Fostering](#)

13.25 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 the Academy, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff 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 the Academy, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Guidance documents:

- [Home Office Preventing Youth Violence and Gang Involvement](#)
- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)

13.26 Sexual violence and sexual harassment between children in schools / academies

Sexual violence and sexual harassment can occur:

- . Between 2 children of any age and sex.
- . Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- . Online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same Academy.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- . Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- . Regularly review decisions and actions, and update policies with lessons learnt.
- . Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- . Consider if there are wider cultural issues within the Academy that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- . Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- . Challenging inappropriate behaviours.
- . Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- . Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our Trust's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- . Increased absence from the Academy.
- . Change in friendships or relationships with older individuals or groups.
- . Significant decline in performance.
- . Signs of self-harm or a significant change in wellbeing.
- . Signs of assault or unexplained injuries.
- . Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

Risk factors which increase the likelihood of involvement in serious violence include:

- . Being male.
- . Having been frequently absent or permanently excluded from the Academy.
- . Having experienced child maltreatment.
- . Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

14. Educational Visitors to each Academy

We will undertake risk assessment and use professional judgement and experience when deciding whether to seek an enhanced DBS for any volunteer not engaging in regulated activity. In doing so we will consider:

- What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments, or volunteers.

- Whether the individual/company has other employment or undertakes voluntary activities where references can be advised, and suitability recorded.
- Whether the role is eligible for an enhanced DBS check.
- We will clearly have decided the level of supervision required through risk assessment – the supervision will be “reasonable in all the circumstances to ensure the protection of children” as stated in KCSIE 2024.

We have clear visitor’s procedure that enables us to offer pupil experiences of meeting other professionals to extend knowledge and curriculum. This clearly states whether they are supervised or unsupervised within the Academy.

14.1. Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors’ book and wear a visitor’s badge.

Visitors to the Academy who are visiting for a professional purpose, such as educational psychologists and Academy improvement officers, will be asked to show photo ID and:

- . Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- . The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the Academy any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using Academy facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

15. Notifying Parents and 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).

16. Vulnerable Children

We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate responses are in place for children who are absent from the Academy or who go missing from education. We will inform the Local Authority of any pupil who fails to attend the Academy regularly, or who has been absent without the Academy's permission for a continuous period of 10 Academy days or more.

As a Trust we are aware of the potential for children with SEN to have additional barriers when it comes to safeguarding, the Trust recognises that this group can be more vulnerable to abuse and neglect. Disabled children may be especially vulnerable to abuse because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

Heightened vulnerability linked to:

- Communications skills.
- Maturity (Lower cognitive ability).
- Perceptions of intent from others.
- Lower self-esteem/confidence.
- Potential to trust unreservedly.
- A need to have "friends" or find a partner.
- Differing boundaries.
- Online safety – digital technology understanding.

A combination of these factors can make them more susceptible to risks.

Children develop and mature at different rates, so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect, so you should also be alert to parent/child interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol, if there is a sudden change in their mental health or if domestic abuse is present. By understanding

the warning signs, you can respond to problems as early as possible and provide the right support and services for the child and their family.

Children say they need:

- **Vigilance:** to have adults notice when things are troubling them
- **Understanding and action:** to be heard and understood; and to have that understanding acted upon
- **Stability:** to be able to develop an on-going stable relationship of trust with those helping them
- **Respect:** to be treated with the expectation that they are competent, rather than not
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans.
- **Explanation:** to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative
- **Support:** to be provided with support in their own right as well as a member of their family
- **Advocacy:** to be provided with advocacy, to assist them in putting forward their views.

16.1. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- . Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- . Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
- . The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- . Communication barriers and difficulties in managing or reporting these challenges.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

16.2. 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.

We have appointed a designated teacher, [insert name/role], 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.

16.3 Alternative Provision

The Trust knows that the cohort of pupils in our provision often have complex needs, the Trustees /Governing Bodies are aware of this additional risk of harm that their pupils may be vulnerable to.

Guidance

- <https://www.gov.uk/government/publications/alternative-provision>
- <https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-Trust>

Our Trust has its own internal Alternative Provision (SEMH hubs): The Woodland AP HUBS, situated on the secondary sites. This provision is used for the majority of AP needs and quality assurance of this is done internally and externally and reported to Governors.

The DSLs from each Academy visit external Alternative Provision prior to a placement to complete the relevant Trust safeguarding paperwork. Visits to individual students happen fortnightly. Risk assessments are completed, if necessary, post visit. Student voice is formally taken half termly. No child is unregistered AP for more than 2 days unless exceptional circumstances are agreed by Trust lead, the Local Authority and the Principal. Letters of assurance are given to us by Alternative providers.

16.4. Children Potentially at Greater Risk of Harm-Children who need a Social Worker (Child in Need & Child Protection Plans)

Our DSLs/DDSs are aware that some children may need a social worker due to safeguarding or welfare needs. Local authorities should share the fact that a child has a social worker. Children may need this help due to abuse, neglect and complex family circumstances.

We know that 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. The DSLs will hold and use information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

Where children need a social worker, this will 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.) We will strengthen provision to reduce absence and exclusions for this group as we recognise that regular attendance is important for vulnerable pupils and school can act as a protective factor.

We will work as a Trust to narrow the attainment gap, have high aspirations for all children with a social worker and will design our Pupil Premium strategy to meet the needs of CWSW (Children with a social worker).

We will ensure that they benefit from additional support to recover from the impact of COVID-19 using a strength-based approach with the child's voice central to our planning. (for example, National Tutoring Programme/Recovery Premium).

The Mental Health Lead in each Academy will work to assess, understand, and meet the Social Emotional & Mental Health needs of Children with a social worker, as we recognise, they are more likely to experience issues than their peers.

17. Information Sharing

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with Working Together to Safeguard Children (2023). Our settings work closely with Stoke and Staffordshire Children's Social Care and, where appropriate from a placing local authority.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Trusts have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, our Governing Bodies recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place to set out clearly the processes and principles for sharing information within our setting and with the three safeguarding partners, other organisations, agencies, and practitioners as required.

We are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Our Governing bodies 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. Our Governing Bodies ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

Where children leave our Trust or one of our Academies, the DSL will ensure that any relevant Child Protection file is transferred to the new setting as soon as possible, ensuring secure transit, with confirmation of receipt.

In addition to the child protection file, our DSLs will also consider if it would be appropriate to share any information with the new Academies in advance of the child leaving. For example, information that would allow the new setting to continue supporting the victims of abuse and have that support in place for when the child arrives.

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.

18. 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.

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 Academy.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the Academy 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 Academy/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 details are kept within My Concern. Any paper-based documents from additional meetings will be held in the safeguarding filing cabinets which are locked and in the safeguarding offices, but also scanned into My Concern.

19. Training

19.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the Academy'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-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment.
 - Have a clear understanding of the needs of all pupils.

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 termly throughout the Safeguarding staff briefings through teams.

Volunteers will receive appropriate training, if applicable.

19.2 The DSL and [deputy/deputies]

The DSL and [deputy/deputies] will undertake child protection and safeguarding training at least annually.

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, NSPCC Harmful sexual behaviour training: NSPCC or CEOP Online Safety and be part of a Mental Health Trust network.

19.3 Governors

All governors 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 Academies to deliver a robust whole-school approach to safeguarding.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal they receive training in managing allegations for this purpose.

All Governors have an introduction to safeguarding training every 3 years; access to the Trust safeguarding briefings and have a termly Governors safeguarding update.

19.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the Academy 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.

20. Managing Complaints

As a Trust we encourage children and families to raise compliments, concerns or comments and have a robust internal investigation process.

The compliment, comment, or complaint policy states clearly the stages of complaints and where to escalate concerns following completion of process either through Ofsted or EFSA. Our complaints policy is on our Trust website for parents/carers to access.

Safeguarding concerns should be raised with Trust immediately. If a concern means a child is at immediate risk, the individual needs to contact Stoke on Trent Children's Advice and Duty (Chad) service on 01782 235100. All visitors are given safeguarding information. This is handed out in reception on arrival, which outlines how to share concerns and code of conduct expected by visitors/contractors.

20.1 Complaints and concerns about the Trust 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.

Whistle-blowing

If you have a separate whistle-blowing policy that covers concerns regarding the way the Academy safeguards pupils – including poor or unsafe practice, or potential failures – refer to it here.

Alternatively, explain your procedures for raising concerns about the Academy's safeguarding practice here. You should consider:

- . What areas of malpractice or wrongdoing are covered by the procedures.*
- . The options available for reporting a concern, including who to approach within the Academy and externally.*
- . How the Academy will respond to such concerns.*
- . What protection is available to staff who report another member of staff.*

Early years providers should also note the requirements set out in paragraph 3.76 of the statutory framework for the Early Years Foundation Stage; you may wish to cover these here if not already covered in a separate policy.

21. Site Security

The Academies within the Trust provide secure sites which are controlled by precise management directives, but the sites are only as secure as the people who use them. All people on the sites must adhere to the rules which govern them. Laxity can cause potential problems with safeguarding, therefore: -

- Gates are kept closed during the Academy day, except the main driveway gate; visitors gain access through the main entrance.
- Visitors, volunteers, must only enter through the main entrance and after signing in at the office will be issued with a lanyard or visitor's pass which is colour coded red or green

depending on checks. The Trust have a clear system of ensuring staff are accompanied / supervised by regulated staff member. Any visitors on sites who are not identifiable by a visitor's pass will be challenged by any staff member and this will be reported to a member of the Senior Leadership Team.

- Parents, carers, and grandparents attending functions have access only through the designated and supervised entrances, with tickets for visitors for appropriate Trust events.
- Children will only be allowed home with adults with parental responsibility or confirmed permission.
- Children should never be allowed to leave the primary Academies alone during Trust hours unless collected by an adult such as a parent who is doing so for a valid reason. They should report to the office to do this.
- Members of staff are always on duty at break times.
- A Health and Safety audit is completed annually with risk assessment/safety planning and will form part of Governors annual report. This will include a fire evacuation and evacuation Prevent risk assessment.
- The risk management of sites security is managed by senior leadership/governance, we have a clear system of risk assessments and review timescales of these.

Organisations or Individuals using Academy Premises

One of our Academies may receive an allegation relating to an incident that happened when an individual or organisation was using their Academy premises for the purposes of running activities for pupils (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, Academies should follow the safeguarding policies and procedures, including informing the LADO. Any incident needs to be reported to the DSL or a safeguarding officer. Out of hours, this would be reported to the Principal.

22. Early Years Foundation

Every child deserves the best possible start in life and the support that enables them to fulfil their potential. Children develop quickly in the early years and a child's experiences between birth and age five have a major impact on their future life chances. A secure, safe and happy childhood is important in its own right. Good parenting and high-quality early learning together provide the foundation children need to make the most of their abilities and talents as they grow up.

The Early Years Foundation Stage (EYFS) sets the standards that all early years' providers must meet to ensure that children learn and develop well and are kept healthy and safe. It promotes teaching and learning to ensure children's 'Trust readiness' and gives children the broad range of knowledge and skills that provide the right foundation for good future progress through Trust and life.

For our staff who work in childcare provision or who are directly concerned with the management of such provision, the Trust needs to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Child Care (Disqualification) Regulations 2018. Further

information on the staff to whom these regulations apply, the checks that should be carried out, and the recording of those checks can be found the following document (2nd bullet point).

Guidance documents:

- [Statutory framework for the early years foundation stage](#)
- [Early years foundation stage \(EYFS\) statutory framework](#)

The Trust ensures that at least one person who has a first aid certificate must always be on the premises and available when children are present and must accompany children on outings.

23. Key Legislation

This policy has been devised in accordance with the following legislation and guidance:

- [Working Together to Safeguard Children 2023 \(DfE\)](#)
- [Staffordshire Safeguarding Children Board Procedures](#)
- [Staffordshire Safeguarding Children Board-Learning Zone](#)
- [Keeping Children Safe in Education 2024](#)
- [Disqualification under the Child Care Act 2006](#)
- [Information Sharing Advice for practitioners providing safeguarding services](#)
- The Children Act 1989 and 2004
- Education Act 2002
- [What to do if you're worried a child is being abused](#)
- [Whistle Blowing policy](#)
- [Online Safety Toolkit](#)
- [Children Missing Education policy](#)
- [Early Years Statutory Framework](#)
- [Statutory policies for Trusts](#)
- [NSPCC/TES safeguarding in education tool](#)
- [Visa – Immigration/Asylum](#)
- [Children's commissioner](#)

24. Trust Policies

To underpin the values and ethos of our Trust and our intent to ensure that pupils at our Trust are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Anti-Bullying Policy
- Attendance and Punctuality Policy
- Student Behaviour Policy

- Educational Visits
- First Aid
- Health, Safety & Emergencies Policy
- Medical Treatment Procedure
- Children Missing Education Policy
- Online Safety – Acceptable Use Policy/Agreement
- Social Networking Protocol
- Recruitment and Selection Policy
- Personnel Code of Conduct
- Positive Handling Policy
- Whistle Blowing

APPROVAL

Monitoring the Effectiveness of the Policy

The effectiveness of this policy will be reviewed annually and the necessary recommendations for improvement will be made as required.

Approved by the Chief Executive Officer

Signed: *Simon French*

(Chief Executive Officer)

Approved by the Alpha Academies Trust Board

Signed: *Kate Townshend*

(Chair)

Links to:

- Appendix 1 – Safer Recruitment and DBS Checks
- Appendix 2 – Safeguarding Induction Sheet
- Appendix 3 – Safeguarding Induction Checklist
- Appendix 4 - Definitions and Indicators of Abuse
- Appendix 5 – Dealing with a Disclosure of Abuse
- Appendix 6 – Allegations of Abuse made against Staff
- Appendix 7 – Role of the Stoke-on-Trent LADO
- Appendix 8 – Operation Encompass
- Appendix 9 – Further Advice on Safeguarding Contacts
- Appendix 10 – Low Level Concerns
- Appendix 11 – Safeguarding Induction Pack
- Appendix 12 – Searching, Screening and Confiscation
- Appendix 13 – New Staff, Governors and Volunteers

Appendix 1: Safer Recruitment and DBS Checks - policy and procedures

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:

- Our 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.
- That as a Trust we conduct online searches of any shortlisted candidates as part of their due diligence. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview.

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).

Shortlisting

Our shortlisting process will usually involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Explore all potential concerns.
- Consider any online searches as part of due diligence.

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.

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 headteacher/principal 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.
- Probe any results from online searches.

- 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 Academy'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 2 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.
 - Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

* Management positions are most likely to include, but are not limited to, Principals and Deputy/Assistant Principals.

For our Primaries: 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 or college 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 the Academy 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 Academy.

Academies with pupils aged under 8 add: 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 us, 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.

Academies with pupils aged under 8 add: 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.
- **Academies with pupils aged under 8 add:**
- 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 members

All Trustees, Local Governors and members 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).

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, Trustees, Local Governors and Members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity.
- Right to work in the UK.
- Other checks deemed necessary if they have lived or worked outside the UK.

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.

Pupils staying with host families

Where the Academy makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the Academy is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

For full details of the Trust's recruitment process, please refer to the Recruitment & Selection Policy (6.37)

Appendix 2: Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers.

We all have a statutory duty to safeguard and promote the welfare of children, and at our Trust we take this responsibility seriously.

If you have any concerns about a child or young person in our Trust, you must share this information immediately with our **Designated Safeguarding Lead** Insert name or **Safeguarding Manager**: Insert Name or **Deputy Designated Safeguarding Lead**: Insert Name

Do not think that your worry is insignificant if it is about hygiene, appearance, or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation. If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the Designated Safeguarding Leads and provide them with a written/electronic record of your concern. A copy of the form to complete is attached to this. Please ensure you complete all sections as described.

If you are unable to locate them ask a member of the Trust office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter. Any allegation concerning a member of staff, a child's foster carer or a volunteer should be reported immediately to the Principal. If an allegation is made about the Principal, you should pass this information to the Chair of the Governing Body. Alternatively, you can contact the Local Authority Designated Officer on 01782 235100.

The people you should talk to in the Academy are:

Designated Safeguarding Lead:

Location of office:

Contact Number:

Deputy Designated Safeguarding Lead:

Location of office:

Contact Number:

Chair of Governing Body:

Contact Number:

Appendix 3: Safeguarding Induction Checklist

Name:

Date:

	<u>Criteria</u>	<u>Comments</u>	<u>Signature</u>
WEEK 1	Meet with the Principal and DSL		
	Name of DSK, role described and contact details		
	Keeping Children Safe in Education, Part 1 issued and explained		
	Role & Responsibility: reporting structure (My Concern), Safeguarding Role in Trust		
	Staff Code of Conduct policy		
	General Data Protection Act		
	Health and Safety: Fire procedures and Fire Officers (review date)		
	Meet Safeguarding Team		
	Named Governors: Safeguarding -		

	Chair -		
	Where to find Safeguarding Policy		
	<p>Policies to read:</p> <ul style="list-style-type: none"> • Health and Safety • Complaints • Safeguarding • Code of Conduct • Whistle Blowing • KCSIE (part 1 or 2) • Online Safety • Site Security • Behaviour • Other: 		
WEEK 2	Training needs identified		
	Training needs scheduled		
	<p>Any other issues:</p> <ul style="list-style-type: none"> • • • <p>Review date:</p>		

Date Induction carried out on:

By:

Signed by Employee:

Date of Completion:

Areas to follow up:

Training needs Identified

Appendix 4: Definitions and Indicators of Abuse

1. 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 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 caregivers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor Trust attendance or often late for Trust.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from Trust; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect.
- Affluent neglect.

2. Physical Abuse

Physical abuse 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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.

3. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.

- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

4. Exploitation

Child Sexual Exploitation occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to Stoke on Trent Social Care- Children’s Advice and Duty service (ChAD). The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity).
- Entering and/or leaving vehicles driven by unknown adults.
- Possessing unexplained amounts of money, expensive clothes or other items.
- Frequenting areas known for risky activities.
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast-food outlets.
- Missing for periods of time (CSE and County Lines)

5. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes themselves in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

6. Responses from Parents/Carers

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to their age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child.
- Unrealistic expectations or constant complaints about the child.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

7. Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment.

- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

Appendix 5: Dealing with a Disclosure of Abuse

When a pupil tells me about abuse, they have suffered, what should I remember?

- Stay calm.
- Do not communicate shock, anger, or embarrassment.
- Reassure the child and tell them that you are pleased that they are speaking to you.
- Never agree or promise to keep it a secret. Assure them that you will try to help but let the child know that you will have to tell other people to do this and state who this will be and why.
- Tell them that you believe them. Children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.
- Tell the child that it is not their fault.
- Encourage the child to talk but do not ask "leading questions" or press for Information.
- Use the acronym **T.E.D**: **T**ell me. **E**xplain. **D**escribe.
- Listen and remember to check that you have understood correctly what the child is trying to tell you.
- Communicate that they have a right to be safe and protected.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what they have told you. It is essential to record in writing, on **My Concern**, all you have heard, though not necessarily at the time of the disclosure.
- At the end of the conversation, tell the child again who you are going to tell and why it is that person or people who need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions that you may have asked. Do not add any opinions or interpretations. (dates, times, names mentioned and to whom the information was passed need to be clearly recorded).
- Use the Trusts written/electronic recording forms.
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing in as much detail as possible.

The information should then be passed, in a timely way, to the DSL/DDSL and immediately if the child discloses any abuse they have suffered or may be at risk of suffering.

If DSL/DDSL not available, it is the staff member's responsibility to make a referral to Staffordshire Children's Advice and Support and inform the DSL at the earliest opportunity. (Stoke on Trent Children's Advice & Duty team) 01782 235100.

Appendix 6: Allegations of Abuse made against Staff

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 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 the Academy.

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 'case manager' will lead any investigation. This will be the Principal, or the Chair of Governors where the Principal 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.

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 Academy 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 Academy 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 Academy or other work for the Trust.

If in doubt, the case manager will seek views from the Academy'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 Academy 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 Academy 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 the Academy 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.
- 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.

For Early Years:

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the Academy 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 Academy 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 Trust'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 Academy, 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 governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the Academy, while the Academy carries out the investigation.
- We will involve the agency fully, but the Academy 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 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 Academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the Academy 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 Academy 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 Academy.

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 Academy 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 Academy will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The Academy 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 Academy will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the 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 Academy'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 Academy 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 Academy.
- 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 Academy 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 Trust's safeguarding system.

Responding to low-level concerns

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously.
- To the individual involved and any witnesses.

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's staff code of conduct. The Principal 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.

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 Academy.

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.

Appendix 7: Role of the Stoke on Trent LADO

The Stoke on Trent City Council LADO (Local Authority Designated Officer) promotes a safer children's workforce by providing effective guidance, advice, and investigation oversight to cases. They may be able to offer advice and assist with communication in situations which sit outside the statutory criteria, albeit at the discretion of the LADO Duty Officer and where the broader goals of a safer children's workforce are relevant.

The service will give advice on how concerns or allegations should be investigated, including if a referral needs to be raised with the Police and/or Children's Social Care. Stoke on Trent LADO is not directly responsible for investigatory activities but will actively support any investigation and give advice around a range of parameters including suspension, possible media interest, when to tell the adult, and ensure all interested parties are appropriately linked together. They will retain oversight of individual cases to ensure concerns or allegations are investigated thoroughly in a fair and timely manner, and will advise in relation to any subsequent duties to communicate with regulatory bodies and/or the DBS.

The Stoke on Trent Safeguarding Children Partnership inter-agency procedures for:

[Managing Allegations of Abuse against a person who works with children](#)

is based on the framework for dealing with allegations made against an adult who works with children, this is detailed in [Working Together 2018](#) and should be followed by all organisations providing services for children and young people. Compliance with these procedures will help to ensure that allegations are dealt with consistently and in a timely manner; that a thorough, proportionate, and fair process is followed and that processes are open to challenge.

Arrangements for managing concerns or allegations of this nature should be robust and effective in keeping children safe. All allegations should be taken seriously, approached with an open mind, and not be driven by preconceived opinions about whether a child has or has not been harmed.

[Guide for Safer Working Practice for Adults who work with Children](#) is available which will help individuals form judgements on what may constitute behaviour that is unsafe or abusive.

Who to refer concerns to:

All reports of concern or allegation to the Stoke on Trent LADO (Local Authority Designated Officer) that an adult working or volunteering with children:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.

- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Step 1: Follow KCSIE 2024 Guidance. Principal/ Chair of Governors/ Proprietor will contact the LADO on 01782 235100.

Step 2: Stoke on Trent's Children's Advice & Duty service (ChAD) will ensure that the matter is passed promptly to the Staffordshire LADO Duty Officer and assist in initiating any additional safeguarding activities.

If your concern or allegation is urgent and outside of office hours telephone: 01782 234234 (Emergency Duty Team).

This single referral point will provide a responsive and inclusive service for all children's workforce sectors, focus the advice and support where it is needed most and enable the team to continue to work effectively with partners.

Appendix 8: Operation Encompass



Staffordshire -Supporting children experiencing domestic abuse throughout Stoke and Staffordshire

Operation Encompass is an information sharing partnership between Staffordshire Police and Staffordshire and Stoke on Trent educational settings (from Reception through to Higher Education) which allows Trusts to offer immediate support for children and young people experiencing domestic abuse.

How does Operation Encompass work?

Information obtained by the police at the attendance of a domestic abuse incident is shared with a Trust prior to the start of the next Trust day which enables appropriate support to be given dependent on the needs of the child.

How do the Trusts receive notification by the police that a domestic incident has occurred?

When an officer attends the incident and completes the risk assessment on their handheld device, the name(s) of the children who form part of the household (whether present or not) are included. Alongside the details of the child, the officer will select the Trust that the child attends from the dropdown list. By completing this section of the risk assessment, the officer generates an automatic referral to the Trust via an email in real time.

Limited information will be shared about the incident; the name and DOB of the child (if known), the fact they have been identified as being in a household where a domestic abuse incident took place, date and time of the incident and a police reference number.

How does the notification help to support the child?

Children experiencing domestic abuse are negatively impacted by this exposure and this can lead to emotional, physical and psychological harm. By providing the Trust with the knowledge that a domestic incident has taken place in the homes of their students the previous day, it allows the Trust to consider appropriate support for the child.

Children's Social Care

Once a notification is received from Staffordshire Police there is **NO** requirement for the Trust to then make a referral to Children's Social Care. Please be reassured that it is purely a notification to enable the Trust to support that child. If there is a requirement for a referral to be made, the Police would have already done this if necessary. The training provided to Trusts outlines this message clearly. Of course, if the child is already an 'open case' then the Trust would inform the dedicated key/social worker of the notification.

Next Steps:

Staffordshire Police, and Staffordshire and Stoke Education Authorities have provided a virtual bespoke training package which will enable Trusts to understand the impact domestic abuse can have on a child and how best to support them in Trust. This will be available in due course.

Appendix 9: Further advice on Safeguarding Contacts

Further advice on Safeguarding matters can also be obtained from:

Local Contacts

- Stoke-on-Trent Children's Services: Chat and Advice Service (CHAD) 01782 235100, between the hours of 8am & 6pm, Monday- Friday.
Select Option 1 if known to have a Social Worker
Select Option 2 for any new queries for children not already open to social care
- Stoke on Trent Emergency Duty Team: 01782 234234 (outside office hours, weekends, and bank holidays) Minicom: 01782 236037
- Staffordshire County Council's Education Safeguarding Advice Service
01785 895836 e-mail: esas@staffordshire.gov.uk ****(for children living within the Staffordshire local authority area)****
- LADO Stoke on Trent 01782 235100/01782?
- Staffordshire Children's Social Care Services: Staffordshire Children's Advice and Support team within the Multi Agency Safeguarding Hub (M.A.S.H.) 0800 1313 126 or using the online referral [Report a concern online](#)
- Staffordshire Emergency Duty Services (out of hours safeguarding concerns) 0345 604 2886 or email eds.team.manager@staffordshire.gov.uk
- Stoke on Trent & Staffordshire Police M.A.S.H. can be contacted on 101. In the event of an emergency please dial 999
- Staffordshire Police coordinator: Mark Hardern Tel: 07539 3636299 Email: mark.hardern@staffordshire.pnn.police.uk
- [Stoke on Trent PREVENT Education officer – Sarah Dyer – 01782 233239/07900135606](#)
- Staffordshire Police Prevent Team 01785 232054, 01785 233109 or email prevent@staffordshire.pnn.police.uk

NSPCC

- Harmful Sexual Behaviour project: **0844 892 0273**
- [Keeping children safe online-online safety/sexting/sending nudes](#)

Local

- Stoke on Trent Safeguarding Children Partnership
- Staffordshire Safeguarding Children Board [StaffsSCB](#)

- Fostering Service (Stoke-on-Trent) 01782 234555
Email: fostering@stoke.gov.uk

National Contacts

- Police (Non-emergency 101)
- CEOP (Child Exploitation and Online Protection) [CEOP Safety Centre](#)
- Professionals Online Safety Helpline – 0844 381 4772 [Safer Internet Helpline](#)
- Internet Watch Foundation (IWF) – [Internet Watch Foundation](#)
- Safer Internet Centre – helpline@saferinternet.org.uk
- Childline – 0800 1111 [Childline](#)
- Ofsted – General enquiries: 0300 123 1231
About Trusts: 0300 123 4234

Concerns: 0300 123 4666

e-mail: enquiries@ofsted.gov.uk
- HM Government (advice on protecting children from radicalisation for parents, teachers and leaders) www.educateagainsthate.com
- **NSPCC** Harmful Sexual Behaviour project: **0844 892 0273**

Useful Websites

- SOT Safeguarding Children Partnership
- Staffordshire Safeguarding Children Board [StaffsSCB](#)
- Child Exploitation and Online Protection Centre (CEOP) – [Ceop-Police](#) & [knowaboutcse](#)
- NSPCC – 24-hour Child Protection Helpline 0808 800 5000
[NSPCC](#)
- WOMENS AID - 24 Hour Helpline: **0870 2700 123**
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999. [Unicef](#)

Appendix 10: Low Level Concerns

Low Level Concerns

1. Introduction

At Alpha Academies Trust, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the Trust, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to children but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Principal about their concern using a Low-Level Record of Concern Form. If the Principal cannot be contacted, the Chair of Governors should be contacted instead.

3. Keeping Children Safe in Education September 2024

The following is taken from Keeping Children Safe in Education September 2024

423. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

424. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should: • encourage an open and transparent culture • enable Academies and colleges to identify inappropriate, problematic or concerning behaviour early • minimise the risk of abuse, and • ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

425. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the Academies or college 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to Trust policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

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

427. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

428. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of Academies and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children has:

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

Low Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ - that an adult may have acted in a manner which:

- Is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children

Appropriate Conduct

- Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law

5. Storing and use of Low-Level Concerns and follow-up information

LLC forms and follow-up information will be stored securely within the Academies safeguarding systems, with access only by the Leadership Team. This will be stored in accordance with the Trust's GDPR and data protection policies.

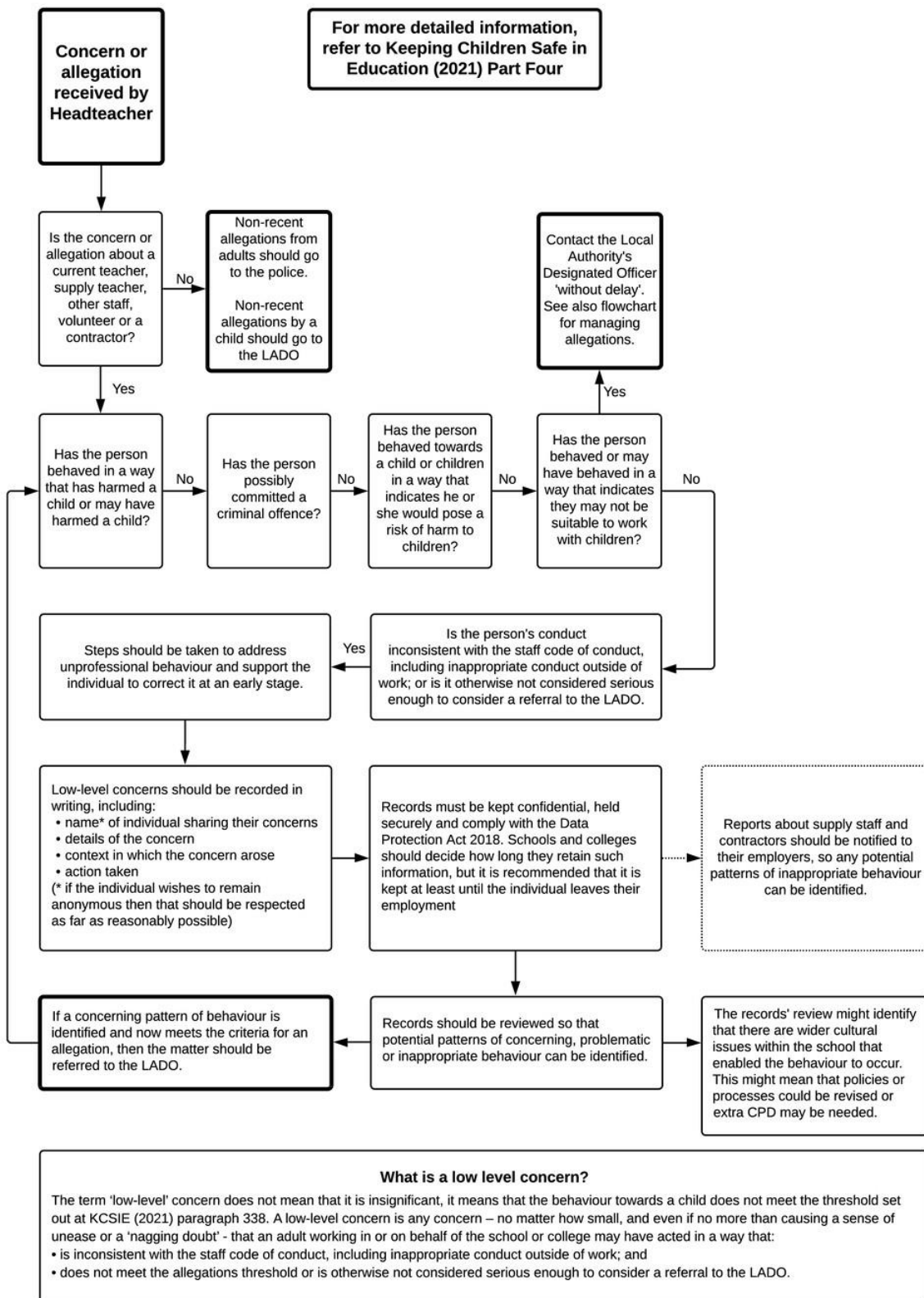
The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Principal or those aware in the Senior Leadership Team.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave the Trust, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

- (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

6. Process to follow when a Low-Level Concern is raised



Low Level Concerns Form

A low-level concern is something you have observed/been told about that you feel needs recording

Name of child/young person /adult	•		
Date and time of this report	•		
DETAILS OF CONCERN /INCIDENT (please tick type as relevant)			
Report written by <i>(Name, signature and role on event)</i>		Witness to the incident (if relevant) <i>(name and signature)</i>	
FINAL UPDATE ON FURTHER ACTIONS (To be completed by the Principal)			
Added by:	Role:	Date:	
Reviewed by Principal (name & signature)			Date:



Appendix 11

Searching, Screening and Confiscation

- Under Article 8 of the *Human Rights Act 1998*, pupils have a right to respect for their private life, which means they can expect a reasonable level of privacy at the Academy. This right is not absolute, but any interference with it by the Academy (or other public body) must be justified and proportionate.

Searching

1. Searching can play a critical role in ensuring that academies are safe environments for all pupils and staff. It is a vital measure to safeguard and promote staff and pupil welfare, and to maintain high standards of behaviour through which pupils can learn and thrive.
2. Principals and staff they authorise have a statutory power to search a pupil or their possessions where they have reasonable grounds to suspect that the pupil may have a prohibited item listed in paragraph 31 or any other item that the rules identify as an item which may be searched for.
3. The list of prohibited items is:
 - knives and weapons
 - alcohol
 - illegal drugs
 - stolen items
 - any article that the member of staff reasonably suspects has been, or is likely to be used:
 - to commit an offence, or
 - to cause personal injury to, or damage to property of; any person (including the pupil).
 - tobacco and cigarette papers
 - vaping devices
 - fireworks; and
 - pornographic images.

4. Under common law, Academy staff have the power to search a pupil for any item if the pupil agrees. The member of staff should ensure the pupil understands the reason for the search and how it will be conducted so that their agreement is informed.

The role of the Principal, the designated safeguarding lead and authorised members of staff

10. Only the Principal, or a member of staff authorised by the Principal, can carry out a search. The Principal can authorise individual members of staff to search for specific items, or all items set out in the Trust's behaviour policy. For example, a member of staff may be authorised to search for stolen property and alcohol but not for weapons or drugs.
11. The Principal can require a member of the security staff to undertake a search. If a security guard, who is not a member of the Academy staff, searches a pupil, this guidance should be followed and the person witnessing the search should be a permanent member of the Academy staff. The Principal may not require any other member of staff to undertake a search if they refuse.
12. The Principal should oversee the Academy's practice of searching to ensure that a culture of safe, proportionate and appropriate searching is maintained, which safeguards the welfare of all pupils and staff with support from the designated safeguarding lead (or deputy).
13. The Principal should ensure that a sufficient number of staff are appropriately trained in how to lawfully and safely search a pupil who is not co-operating, so that these trained staff can support and advise other members of staff if this situation arises. However, it is vital that all staff understand their rights and the rights of the pupil who is being searched.
14. The designated safeguarding lead (or deputy) should be informed of any searching incidents where the member of staff had reasonable grounds to suspect a pupil was in possession of a prohibited item as listed in paragraph 3. The staff member should also involve the designated safeguarding lead (or deputy) without delay if they believe that a search has revealed a safeguarding risk.
15. If the designated safeguarding lead (or deputy) finds evidence that any child is at risk of harm, they should make a referral to children's social care services immediately (as set out in part 1 of Keeping children safe in education). The designated safeguarding lead (or deputy) should then consider the circumstances of the pupil who has been searched to assess the incident against potential wider safeguarding concerns. See paragraphs 44-46 on recording searches.

Before searching

16. A search can be considered if the member of staff has reasonable grounds for suspecting that the pupil is in possession of a prohibited item or any item identified in the Trust rules for

which a search can be made, or if the pupil has agreed. See paragraphs 2-4 on powers to search.

17. The authorised member of staff should make an assessment of how urgent the need for a search is and should consider the risk to other pupils and staff.
18. Before any search takes place, the member of staff conducting the search should explain to the pupil why they are being searched, how and where the search is going to take place and give them the opportunity to ask any questions.
19. The authorised member of staff should always seek the co-operation of the pupil before conducting a search. If the pupil is not willing to co-operate with the search, the member of staff should consider why this is. Reasons might include that they:
 - are in possession of a prohibited item.
 - do not understand the instruction.
 - are unaware of what a search may involve; or
 - have had a previous distressing experience of being searched.
20. If a pupil continues to refuse to co-operate, the member of staff may sanction the pupil in line with the Trust's behaviour policy, ensuring that they are responding to misbehaviour consistently and fairly. See Behaviour in Schools for more information on lawful sanctions.
21. If the member of staff still considers a search to be necessary, but is not required urgently, they should seek the advice of the Principal, designated safeguarding lead (or deputy) or pastoral member of staff who may have more information about the pupil. During this time the pupil should be supervised and kept away from other pupils.
22. If the pupil still refuses to co-operate, the member of staff should assess whether it is appropriate to use reasonable force to conduct the search (please see Positive Handling Policy). A member of staff can use such force as is reasonable to search for any prohibited items identified in paragraph 3, but not to search for items which are identified only in the Trust rules. See guidance on the Use of reasonable force in schools. The decision to use reasonable force should be made on a case-by-case basis. The member of staff should consider whether conducting the search will prevent the pupil harming themselves or others, damaging property or from causing disorder.
23. It should be noted that the use of reasonable force will differ depending on whether the member of staff is searching possessions or the pupil themselves.

During a search

Where

24. An appropriate location for the search should be found. Where possible, this should be away from other pupils. The search must only take place on the Academy premises or where the member of staff has lawful control or charge of the pupil, for example on an Academy trip.

Who

25. The law states the member of staff conducting the search must be of the same sex as the pupil being searched. There must be another member of staff present as a witness to the search.

26. There is a limited exception to this rule. This is that a member of staff can search a pupil of the opposite sex and/or without a witness present only:

- If the member of staff carrying out the search reasonably believes there is risk that serious harm will be caused to a person if the search is not carried out as a matter of urgency; and
- In the time available, it is not reasonably practicable for the search to be carried out by a member of staff who is same sex as the pupil or it is not reasonably practicable for the search to be carried out in the presence of another member of staff.

27. When a member of staff conducts a search without a witness they should immediately report this to another member of staff, and ensure a record of the search is kept. See paragraphs 44-46 on recording searches.

The extent of the search

28. A member of staff may search a pupil's outer clothing, pockets, possessions, desks or lockers.

29. The person conducting the search must not require the pupil to remove any clothing other than outer clothing. 'Outer clothing' means any item of clothing that is not worn wholly next to the skin or immediately over a garment that is being worn as underwear, as well as hats, shoes, boots or scarves.

30. 'Possessions' means any goods over which the pupil has or appears to have control - this includes desks, lockers and bags.

31. A member of staff is able to search lockers and desks or other personal spaces at the Academy for any item provided the pupil agrees. Academies can make it a condition of having the locker or space that the pupil agrees to have these searched. If the pupil withdraws their agreement to search, a search may be conducted both for the prohibited items listed in paragraph 3 and any items identified in the Trust rules for which a search can be made.

32. A pupil's possessions can only be searched in the presence of the pupil and another member of staff, except where there is a risk that serious harm will be caused to a person if the search is not conducted immediately and where it is not reasonably practicable to summon another member of staff. See paragraphs 25-27 on who can conduct a search.

33. The member of staff may use a metal detector to assist with the search.
34. The member of staff's power to search outlined above does not enable them to conduct a strip search.

Strip searching

35. A strip search is a search involving the removal of more than outer clothing (see paragraph 29). Strip searches on Academy premises can only be carried out by police officers under the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with the Police and Criminal Evidence Act 1984 (PACE) Code C. While the decision to undertake the strip search itself and its conduct are police matters, Academy staff retain a duty of care to the pupil(s) involved and should advocate for pupil wellbeing at all times.
36. Before calling police to the Academy, staff should assess and balance the risk of a potential strip search on the pupil's mental and physical wellbeing and the risk of not recovering the suspected item. Staff should consider whether introducing the potential for a strip search through police involvement is absolutely necessary, and should always ensure that other appropriate, less invasive approaches have been exhausted. Once the police are on Academy premises, the decision on whether to conduct a strip search lies solely with them, and the role of the Academy is to advocate for the safety and wellbeing of the pupil(s) involved.
37. Unless there is an immediate risk of harm and where reasonably possible, staff should inform a parent of the pupil suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult. Parents should always be informed by a staff member once a strip search has taken place. Academies should keep records of strip searches that have been conducted on premises and monitor them for any trends that emerge.

The process the police must follow during a strip search

38. Except in cases of urgency where there is risk of serious harm to the pupil or others, whenever a strip search involves exposure of intimate body parts there must be at least two people present other than the pupil, one of which must be the appropriate adult.
- 13 If the pupil's parent would like to be the appropriate adult, the Academy should facilitate this where possible. Police officers carrying out the search must be of the same sex as the pupil being searched. An appropriate adult not of the same sex as the pupil being searched may be present if specifically requested by the pupil. Otherwise, no-one of a different sex to the pupil being searched is permitted to be present, and the search must not be carried out in a location where the pupil could be seen by anyone else.
39. Except in urgent cases as above, a search of a pupil may take place without an appropriate adult only if the pupil explicitly states in the presence of an appropriate adult that they do not want an appropriate adult to be present during the search and the appropriate adult agrees.

A record should be made of the pupil's decision and signed by the appropriate adult. The presence of more than two people, other than an appropriate adult, shall be permitted only in the most exceptional circumstances.

40. Strip searching can be highly distressing for the pupil involved, as well as for staff and other pupils affected, especially if undertaken on premises. PACE Code C states that a strip search may take place only if it is considered necessary to remove an item related to a criminal offence, and the officer reasonably considers the pupil might have concealed such an item. Strip searches should not be routinely carried out if there is no reason to consider that such items are concealed.

After-care following a strip search

41. Pupils should be given appropriate support, irrespective of whether the suspected item is found. If an item is found, this may be a police matter, but should always be accompanied by a safeguarding process handled by the Academy which gives attention to the pupil's wellbeing and involves relevant staff, such as the designated safeguarding lead (or deputy).

Safeguarding should also be at the centre of support following a strip search in which the item is not found, both in the sense of supporting the pupil to deal with the experience of being searched, and regarding wider issues that may have informed the decision to conduct a strip search in the first place. In both cases, pupils should feel that they have an opportunity to express their views regarding the strip search and the events surrounding it. Academy staff should give particular consideration to any pupils who have been strip searched more than once and/or groups of pupils who are more likely to be subjected to strip searching with unusual frequency and consider preventative approaches.

After a search

42. Whether or not any items have been found as a result of any search, Academies should consider whether the reasons for the search, the search itself, or the outcome of the search give cause to suspect that the pupil is suffering, or is likely to suffer harm, and/or whether any specific support is needed. Where this may be the case, staff should follow the Trust's child protection policy and speak to the designated safeguarding lead (or deputy) as set out in Part 1 of Keeping children safe in education. They will consider if pastoral support, an early help intervention or a referral to children's social care is appropriate. If any prohibited items are found during the search, the member of staff should follow the guidance set out below in paragraphs 57-81 on confiscation.
43. If a pupil is found to be in possession of a prohibited item listed in paragraph 3, then the staff member should alert the designated safeguarding lead (or deputy) and the pupil should be sanctioned in line with the Trust's behaviour policy to ensure consistency of approach.

Recording searches

44. Any search by a member of staff for a prohibited item listed in paragraph 3 and all searches conducted by police officers should be recorded in the Trust's safeguarding reporting system, including whether or not an item is found. This will allow the designated safeguarding lead (or deputy) to identify possible risks and initiate a safeguarding response if required. Principals may also decide that all searches for items banned by the Trust's rules should be recorded. Staff members should follow the Trust policy in these cases.
45. Academies are encouraged to include in the record of each search:
- the date, time and location of the search
 - which pupil was searched
 - who conducted the search and any other adults or pupils present
 - what was being searched for
 - the reason for searching
 - what items, if any, were found; and
 - what follow-up action was taken as a consequence of the search.
46. Academies who conduct a high number of searches should consider whether the searches fall disproportionately on any particular groups of pupils by analysing the recorded data. In such cases where searching is falling disproportionately on any group or groups, they should consider whether any actions should be taken to prevent this. See also paragraphs 108-110 of Behaviour in Schools.

Informing parents

47. Academies should reinforce the whole-school approach by building and maintaining positive relationships with parents. Parents should always be informed of any search for a prohibited item listed in paragraph 3 that has taken place, and the outcome of the search as soon as is practicable. A member of staff should inform the parents of what, if anything, has been confiscated and the resulting action the Academy has taken, including any sanctions applied.
48. Academies should consider that in some circumstances it might also be necessary to inform parents of a search for an item banned by the Trust policy.
49. Any complaints about searching, screening or confiscation should be dealt with through the normal Trust complaints procedure.

Screening

50. Screening can help provide reassurance to pupils, staff and parents that the Academy is taking measures to create a calm, safe and supportive environment.
51. Academy's statutory power to make rules on pupil behaviour¹⁵ and their duties as employers in relation to the safety of staff, pupils and visitors enables them to impose a requirement that pupils undergo screening.
52. Screening is the use of a walk-through or hand-held metal detector (arch or wand) to scan all pupils for weapons before they enter the premises.
53. Before considering the installation and use of any technology for screening, the Principal is encouraged to consult with the local police who may be able to provide advice about whether installation of these devices is appropriate.
54. If a Principal decides to introduce a screening arrangement, they should inform pupils and parents in advance to explain what the screening will involve and why it will be introduced.
55. Where a pupil has a disability, academies should make any reasonable adjustments to the screening process that may be required.
56. If a pupil refuses to be screened, the member of staff should consider why the pupil is not co-operating and make an assessment of whether it is necessary to carry out a search. See paragraphs 18-23 for more information on when a pupil refuses a search, including sanctioning.

Confiscation

Items found as a result of a search

57. An authorised staff member carrying out a search can confiscate any item that they have reasonable grounds for suspecting:
- poses a risk to staff or pupils.
 - is prohibited, or identified in the rules for which a search can be made. (see paragraphs 2-3); or
 - is evidence in relation to an offence.

Prohibited or illegal items

58. Controlled drugs must be delivered to the police as soon as possible unless there is a good reason not to do so. In these cases, the member of staff must safely dispose of the drugs. In determining whether there is a good reason to dispose of controlled drugs, the member of staff must have regard to the following guidance in paragraph 59 below issued by the Secretary of State.

59. The member of staff should take into account all relevant circumstances and use their professional judgement to determine whether they can safely dispose of the controlled drug. When staff are unsure as to the legal status of a substance and have reason to believe it may be a controlled drug, they should treat it as such. If the member of staff is in doubt about the safe disposal of controlled drugs, they should deliver them to the police.
60. Other substances which are not believed to be controlled should also be delivered to the police, or disposed of as above, if the member of staff believes they could be harmful.
61. Where a person conducting a search finds alcohol, tobacco, cigarette papers or fireworks, they may retain or dispose of them as they think appropriate but should not return them to the pupil.
62. If a member of staff finds a pornographic image, they may dispose of the image unless they have reasonable grounds to suspect that its possession constitutes a specified offence (i.e. it is extreme or an indecent image of a child) in which case it must be delivered to the police as soon as reasonably practicable. Members of staff should never intentionally view any indecent image of a child (also sometimes known as nude or semi-nude images). Staff must never copy, print, share, store or save such images. See paragraphs 72-79 for further advice on searching electronic devices.
63. Where a member of staff finds stolen items, these must be delivered to the police as soon as reasonably practicable. However, if there is good reason to do so, the member of staff may also return the item to the owner or retain or dispose of it if returning them to their owner is not practicable. In determining whether there is a good reason to return the stolen item to its owner or retain or dispose of the item, the member of staff must have regard to the following guidance issued by the Secretary of State in paragraph below.
64. The member of staff should take into account all relevant circumstances and use their professional judgement to determine whether they can safely dispose of the seized article. In taking into account the relevant circumstances, the member of staff should consider the following:
- a) the value of the item - it would not be reasonable or desirable to involve the police in dealing with low value items such as pencil cases, though Academy staff may judge it appropriate to contact the police if the items are valuable.
 - b) whether the item is banned by the Academy.
 - c) whether retaining or returning the item to the owner may place any person at risk of harm; and
 - d) whether the item can be disposed of safely.
65. Any weapons or items which are evidence of a suspected offence must be passed to the police as soon as possible.
66. Items that have been (or are likely to be) used to commit an offence or to cause personal injury or damage to property should be delivered to the police as soon as reasonably practicable,

returned to the owner, retained or disposed of. In deciding what to do with such an item, the member of staff must have regard to the guidance issued by the Secretary of State in paragraphs 67-68.

67. The member of staff should take into account all relevant circumstances and use their professional judgement to determine whether the item should be delivered to the police, retained, returned to the owner or disposed of. In taking into account all relevant circumstances the member of staff should consider:
- whether it is safe to dispose of the item; and
 - whether and when it is safe to return the item.
68. If a member staff suspects a confiscated item has been used to commit an offence or is evidence in relation to an offence, the item should be delivered to the police.
69. Members of staff should use their judgement to decide to return, retain or dispose of any other items banned under the Trust rules. In deciding what to do with such an item, the member of staff must have regard to the guidance issued by the Secretary of State in paragraph 70.
70. The member of staff should take into account all relevant circumstances and use their professional judgement to determine whether they can safely dispose of the seized item. In taking into account all relevant circumstances, the member of staff should consider:
- the value of the item
 - whether it is appropriate to return the item to the pupil or parent; and
 - whether the item is likely to continue to disrupt learning or the calm, safe and supportive environment of the Academy.
71. Members of staff should follow any additional guidance and procedures on the retention and disposal of items put in place by the Academy.

Electronic devices

72. Electronic devices, including mobile phones, can contain files or data which relate to an offence, or which may cause harm to another person. This includes, but is not limited to, indecent images of children, pornography, abusive messages, images or videos, or evidence relating to suspected criminal behaviour.
73. As with all prohibited items, staff should first consider the appropriate safeguarding response if they find images, data or files on an electronic device that they reasonably suspect are likely to put a person at risk.
74. Staff may examine any data or files on an electronic device they have confiscated as a result of a search, as defined in paragraph 57, if there is good reason to do so.

75. If the member of staff conducting the search suspects they may find an indecent image of a child (sometimes known as nude or semi-nude images), the member of staff should never intentionally view the image, and must never copy, print, share, store or save such images. When an incident might involve an indecent image of a child and/or video, the member of staff should confiscate the device, avoid looking at the device and refer the incident to the designated safeguarding lead (or deputy) as the most appropriate person to advise on the Academy's response. Handling such reports or concerns can be especially complicated and Academies should follow the principles as set out in Keeping children safe in education. The UK Council for Internet Safety also provides the following guidance to support staff and designated safeguarding leads: Sharing nudes and semi-nudes: advice for education settings working with children and young people.
76. If a member of staff finds any image, data or file that they suspect might constitute a specified offence, then they must be delivered to the police as soon as is reasonably practicable.
77. In exceptional circumstances members of staff may dispose of the image or data if there is a good reason to do so. In determining a 'good reason' to examine or erase the data or files, the member of staff must have regard to the following guidance issued by the Secretary of State in paragraphs 78 and 79 below.
78. In determining whether there is a 'good reason' to examine the data or files, the member of staff should reasonably suspect that the data or file on the device has been, or could be used, to cause harm, undermine the safe environment of the Academy and disrupt teaching, or be used to commit an offence.
79. In determining whether there is a 'good reason' to erase any data or files from the device, the member of staff should consider whether the material found may constitute evidence relating to a suspected offence. In those instances, the data or files should not be deleted, and the device must be handed to the police as soon as it is reasonably practicable. If the data or files are not suspected to be evidence in relation to an offence, a member of staff may delete the data or files if the continued existence of the data or file is likely to continue to cause harm to any person and the pupil and/or the parent refuses to delete the data or files themselves.

Confiscation as a disciplinary penalty

80. Academy's general power to discipline enables a member of staff to confiscate, retain or dispose of a pupil's property as a disciplinary penalty, where reasonable to do so.
81. The law protects members of staff from liability in any proceedings brought against them for any loss of, or damage to, any item they have confiscated, provided they acted lawfully.

Other relevant departmental advice and statutory guidance

- Behaviour in Schools guidance
- Schools and College security guidance

- Equality Act 2010 and schools guidance
- Keeping children safe in education guidance
- Use of reasonable force in schools guidance
- Working together to safeguard children guidance.
- DfE and ACPO drug advice for schools.
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Police and Criminal Evidence Act 1984 (PACE) codes of practice.



Appendix 12

New Staff, Governors and Volunteers

As a new member of staff or volunteer (including Governors) you may be in regular contact with children and get to know them well.

You may develop trusting relationships, observe changes in behaviour, and sometimes may be chosen to share a young person's confidences or concerns.

Safeguarding is everyone's responsibility – we rely on all those working with children to take any suspicions, allegations or concerns about a child seriously.

It is our collective responsibility to protect all children from physical, sexual and emotional harm and neglect.

Anyone working in our organisation – whether paid or voluntary – is required to disclose **all** convictions and checks will be made on anyone who has not already been vetted.

The Governing Body will have a policy on DBS checks for governors as it is not a statutory requirement (unless the governor is in regular contact with children) but it is good practice.

How can you contribute?

- Ensure that your behaviour is appropriate at all times.
- Take **immediate** steps if abuse is alleged or suspected (see below).
- Remember to put the welfare of the child or young person **first**.

If a child or young person tells you something that concerns you:

Whilst this is an alarming situation it is important that you know what to do in such an eventuality and for you to stay calm.

- Take what you are being told seriously.
- Listen carefully do not interrupt.

- Always accept that the child says no matter how fanciful it may appear to you – let them know you believe them.
- Only ask open-ended questions – avoid using leading questions.
- Do not pressure the child/young person into telling you more than they want to.
- Allow the child/young person to talk at their own pace and use their own language.
- Reassure – tell them they have done the right thing to report their concerns and that they will be taken seriously and kept safe.
- After the child has told you the concern, complete a Safeguarding Concern form recording the exact words used by the child.

Do not discuss with anyone who is not a member of the Safeguarding Team.

In all cases you must share your concerns with:

- The DSL or their Deputy **immediately**

Always record what you have been told (using the actual words said to you by someone else) and give the record to the DSL or their Deputy – **do not keep a copy for yourself.**

If you see staff being unprofessional (being over friendly with children; having favourites; taking photographs of children on personal mobile phones, using inappropriate or offensive language, you must report this straight away to the Principal.

The Principal will then make enquiries and gather information about whether this is to be handled as a 'low level' concern or refer to the Local Authority.

If you receive an allegation of abuse involving a member of staff (from any organisation) a carer or a volunteer, including yourself:

- Inform the Principal or DSL immediately.
- If it is about the Principal or DSL, inform the Chief Executive Officer.
- Do not discuss the matter with anyone else.
- Record what you have been told and give the record to the Principal, DSL, Chief Executive Officer or Chair of Governors as appropriate.

All new staff and volunteers should receive safeguarding induction from the DSL or Deputy DSL at their setting within a few weeks of starting work or volunteering, make sure you get yours.

Top Tips:

- Look out for signs that concern you.
- Listen to what the child/young person says.

- Always record and pass to the DSL.
- Act immediately.

Behaviour Guidelines For Staff & Volunteers

DO NOT:

Use your position to gain access to information for your own advantage or another's detriment

- Intimidate, threaten, coerce or undermine anyone, staff or students
- Engage in any sexual activity (even consensual) with a student under 18 years who is attending your educational establishment
- Play games or have physical contact that is inappropriate
- Use disproportionate force when addressing student behaviour
- Jump to conclusions about people's behaviour without checking facts
- Investigate any allegations yourself
- Make suggestive remarks or gestures, tell jokes of a sexual nature or engage in inappropriate verbal banter
- Create a personal relationship with a student where one does not already exist
- Give **any** personal details about yourself or others to a student unless you have agreed this with a senior member of staff
- Allow any student to access any of your personal accounts on social networking sites, or accept friend requests from students or ex-students
- Rely on your good name to protect you - it may not be enough
- Believe that an allegation could not be made against you, it could.

(See staff code of conduct for further guidance)

DO:

- Encourage discussion about safeguarding amongst staff & volunteers
- Report all health & safety issues without delay
- Keep students safe and protect them from physical, sexual and emotional harm
- Look after yourself
- Treat everyone with respect
- Provide a positive example you wish others to follow
- Work with another appropriate adult in all planned activities whenever possible
- Risk assess all situations when you are working alone with a student and make sure you are seen and/or heard by others
- Respect people's right to personal privacy
- Create an environment in which people feel comfortable in pointing out attitudes and behaviours they don't like
- Report and challenge all inappropriate and/or abusive activities, such as ridicule, bullying and discrimination
- Familiarise yourself with the Alpha Academies Trust's code of conduct
- Report any gifts you receive & ensure they are not of significant value or intention
- Give gifts to students only as part of an agreed reward system
- Follow procedures for reporting all allegations against Teachers and other staff.

Definitions of Abuse

General Definition:

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing 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 a stranger, for example, via the internet. They may be abused by an adult or adults, or another child or children.

Physical Abuse:

Physical abuse 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:

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyber-bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse:

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may 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 (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse as can other children.

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).
 - Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

We also need to recognise that, young people can be exposed to extremist influences or prejudiced views, particular those via the internet and other social media. "Academies/Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol. Academies/Schools work on Prevent needs to be seen in this context.

The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values. Awareness of Prevent and the risks it is intended to address are both vital. Staff can help to identify, and to refer to the relevant agencies, children whose behaviour suggests that they are being drawn into terrorism or extremism" (*Prevent Strategy*)

Academies, working with other local partners, families and communities, can help support students who may be vulnerable as part of their safeguarding responsibilities.

So, the tasks facing academies/schools and colleges are to:

- raise awareness.
- provide information.
- enable learners to make a positive contribution; and
- safeguard young people.

Procedure if child abuse is discovered or suspected

Basic Principles:

- Do not interrogate the child, but check out in a non-leading way that you are clear about what the child or young person is saying
- **Do not discuss your concerns with the parents/carers** until you have talked to the Lead or Deputy Safeguarding Lead (DSL)
- If possible, ensure that a familiar, trusted adult remains with the child

- Do not promise the child that you will not tell anyone or to keep 'secrets' about what they may say to you – it is vital that the child receives appropriate support and protection from other agencies
- Allow the child space and time to talk to you
- Do not keep information to yourself (you need to share it immediately with the Lead or Deputy DSL), but do not discuss it with others unless the DSL agrees to this. Record this on a safeguarding/child protection concern sheet (staff room copies) or My Concern if you have access.

Relevant Information:

Try to give the DSL as much detail as possible about what you have seen or heard.

Complete a 'Child Protection/Safeguarding' concern sheet with this information on if you are a visitor. If you are a member of staff, use My Concern.

Recording:

You will be asked to record any incidents and concerns you have when you have talked to the DSL. This will need to be done straight away; if someone has told you something you must record the actual words that they said to you. The DSL will give you guidance about what this recording requires.

Confidentiality:

Do not discuss any confidential information about a child with general staff without the agreement of the DSL or Principal.

No information about a child should be left lying around. Safeguarding and Child Protection records should not be seen by anyone else, without permission from the DSL, including anyone with parental responsibility.

Safeguarding Children in Education Training Pathway

**Principal,
relevant
Governor and
Senior
Leadership**

- Safer Recruitment Training
- Introduction to Safeguarding (Level 1)
And:
- *Child Protection Level 2 Training (Principal)*
- Governors Safeguarding Training
- *Prevent Training*
- Regular Bulletins from Trust Lead

**All staff who
have regular
contact with
children:**

- **Safeguarding Induction** (from DSL)
And
- **Annual refresher on safeguarding** (from DSL)
And
- **Basic Safeguarding Children in Education Training (Level 1)**
- **Prevent Training**
- **Regular bulletins from Trust Lead**

**All Heads of Year/
Pastoral Staff**

**Training for all staff
who have regular
contact with
children**

**+ NSPCC Harmful
Sexual behaviours
training**

**Lead & Deputy Child Protection Liaison Teacher or Officer
& any other staff with a significant child protection role:**

Training for all staff who have regular contact, plus:

Training for all pastoral & support staff, plus:

Required training for role:

- Level 2 Safeguarding and Child Protection Training**
- Level 3 Safeguarding Training various modules**
- Level 4 Allegations against members of staff training**
- Level 4 DSL training**
- NSPCC Harmful Sexual Behaviours Training**
- + Access to Teams group for sharing best practice**