



Castle Hall Academy

# Safeguarding and Child Protection Policy

September 2021



***Safeguarding and promoting the welfare  
of children is everyone's responsibility.***

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## **IMPACT EDUCATION MULTI-ACADEMY TRUST**

### **Mission**

*Impact Education Multi Academy Trust is on a mission to improve the life chances of children and young people and improve social mobility for the disadvantaged.*

### **Vision**

*A Trust **where hearts and minds connect**; values-driven partners who work collaboratively to ensure education impacts positively on students, families, communities and staff.*

Impact is a values driven organisation with the belief that collaborative leadership and strong partnership development can lead to significant positive impact on the quality of education. We believe that this can happen without academies losing their own identity.

We are an organisation where Hearts and Minds Connect and have developed a culture and ethos that ensures children and young people achieve the very best outcomes whilst developing a life-long love of learning. We have high expectations academically but we also place a great emphasis on positive attitudes to learning and building effective relationships with others. Our children and young people are encouraged to develop themselves as fully rounded, emotionally intelligent individuals. Our people are highly valued and encouraged to take advantage of the wealth of developmental opportunities across the Trust.

**The following policy must be read in conjunction with the *Staff Policy Handbook*  
May 2021  
of the IMPACT Education Multi-Academy Trust.**

**This policy applies to all adults, including volunteers, working in or on behalf of the academy.**

**The following policies can be found in the *Staff Policy Handbook for the IMPACT Education Multi-Academy Trust*:**

**Recruitment Policy. P.6-19.**

**Staff code of conduct. P.36-41.**

**Disciplinary Procedure. Pages 42-51.**

**Anti-Harassment and Bullying Policy. P.69-71.**

**Social Media Policy. P.84-86.**

**Whistleblowing. P.87-92.**

**GDPR. P.192-208.**

**CCTV and Monitoring. P.209-217.**

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# Safeguarding- Child Protection Policy and Procedure.

[September 2021]

Castle Hall Academy



<b>Date of Issue:</b>	<b>September 2021</b>	
<b>Status:</b>	<b>Statutory</b>	
<b>Approved by LGB:</b>	Phil Shire	<b>Date: September 2021</b>
<b>Last reviewed on:</b>	September 2021	
<b>Next review due by:</b>	September 2022	

***Safeguarding and promoting the welfare of children is everyone's responsibility.***

At Castle Hall Academy we believe that as the current *Keeping Children Safe in Education* (KCSIE) states (P.5):

1. "Academies and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children.
  
2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.
  
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
  
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
  - protecting children from maltreatment;
  - preventing impairment of children's mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - taking action to enable all children to have the best outcomes.
  
5. Children includes everyone under the age of 18."

We believe that therefore:

- Academies play a key role in the prevention of abuse.
- All children have the right to be protected from harm.
- Children need support which matches their individual needs, including those who may have experienced abuse.



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<b>Academy Contacts</b>	
Designated Safeguarding Lead (DSL)	Sinead Jefferson
Deputy Designated Safeguarding Lead (Deputy DSL) Any other staff trained to DSL level	Rachel Haigh DDSL Christian Jackson Billie Adams Clare Ennis Lisa Bonham Rebecca Ward
Designated Looked after Children Lead	Sinead Jefferson
Well-being Lead	Rebecca Ward
Prevent Lead	Sinead Jefferson
Headteacher/Principal	Paul Brook
<b>Governor/Trustee Contacts</b>	
CEO	Mick Kay
Chair of Governors	Phil Shire
Governor responsible for Safeguarding	Alok Krishnan
Trustee responsible for Safeguarding	Ashley Lord
<b>Local Authority Contacts/ Safeguarding Partners</b> <b>Our academy follows the safeguarding protocols and procedures of our Safeguarding Partners</b> <b>NB. Check where all pupils reside as you may need details of more than one authority, board</b>	
Local safeguarding children board	<a href="https://www.kirkleessafeguardingchildren.co.uk/">https://www.kirkleessafeguardingchildren.co.uk/</a>
Local authority children's social care referral team	<a href="https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/safeguarding-processes-and-systems/duty-and-advice/">https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/safeguarding-processes-and-systems/duty-and-advice/</a>  01484 414960
The Designated Officer for child protection (sometimes referred to as the LADO)	Sandra Shaw <a href="mailto:lado.cases@kirklees.gov.uk">lado.cases@kirklees.gov.uk</a> 01484221126



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Local authority Prevent Lead	Alison Clarkson Tel: 07976 497 849
Local authority's out of hours social care contact numbers	01484 456848 Contact relevant services or 01484 414933
<b>Police</b>	
Local Police Emergency	999
Local Police non-emergency	101
<b>Location of local authority safeguarding and child protection documents in academy</b>	
Local authority documents, e.g. thresholds, referral forms and related guidance can be found:	<a href="https://www.kirkleessafeguardingchildren.co.uk/">https://www.kirkleessafeguardingchildren.co.uk/</a>
<b>National Contacts</b>	
NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
NSPCC Text line	88858

**Legislation and statutory guidance.**

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:  
 Section 175 of the Education Act 2002, which places a duty on academies and local authorities to safeguard and promote the welfare of pupils  
 The Academy Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques  
 Part 3 of the schedule to the Education (Independent Academy Standards) Regulations 2014, which places a duty on academies and independent academies to safeguard and promote the welfare of pupils at the academy  
 The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children





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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 academies' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

This policy also complies with our Trust funding agreement and articles of association.

This policy also complies with our funding agreement and articles of association.

**All academies note:** your safeguarding policy should refer to locally agreed multi-agency procedures that have been put in place by the 3 safeguarding partners. 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) Mel Meggs, Director of Kirklees Children Services
- Penny Woodhead, Chief Quality & Nursing Officer Clinical Commissioning Group
- The chief officer of police for a police area in the LA area, Julie Sykes

Kirklees

<https://www.kirkleessafeguardingchildren.co.uk>

**2. Definitions:**

**Safeguarding and promoting the welfare of children means:**

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;

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- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

**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 1 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 1 defines neglect in more detail.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

**Children** includes everyone under the age of 18.

### **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 (<https://www.castlehall.com/academy-information/>)

SENCo Mr. Patrick Kennedy

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

### **5. Roles and responsibilities**

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the academy and is consistent with the procedures of the 3 safeguarding partners <https://www.kirkleessafeguardingchildren.co.uk/wp-content/uploads/2019/07/MASA-v8-Final.pdf>.

Our policy and procedures also apply to extended academy and off-site activities.

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**5.1 All staff** 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. All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance. All staff will be aware of: Our systems which support safeguarding, including this child protection and safeguarding policy, the staff policy handbook and code of conduct, the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies], the behaviour policy, online safety policy and the safeguarding response to children who go missing from education

- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside academy and/or can occur between children outside of this environment
- All staff should consider whether children are at risk of abuse or exploitation in situations outside their families (e.g. sexual exploitation, criminal exploitation, serious youth violence)

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 deputy(ies) (DDSL), the CHA culture/behaviour policy, and the safeguarding response to children who go missing from education. Available on the shared staff drive, display boards, staff room and safeguarding office

The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization.



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Staff are expected to report any concerns to a safeguarding lead within in the academy and record their concern on CPOMS in a timely manner. Staff receive training both face to face and online throughout the year to keep them up to date and informed on signs to look out for and how to report a concern and to whom.

Staff are supported through Induction, Annual Safeguarding Training, designated safeguarding weeks in academy and regular updates. All staff (including temporary staff and volunteers) are provided with the academy's safeguarding policy and child protection procedures and are informed of academy's child protection arrangements on induction. All staff sign a register to say that they have received, read and understood the policy.

## **5.2 The designated safeguarding lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is Sinead Jefferson Assistant Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding.

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

[sjefferson@castlehall.com](mailto:sjefferson@castlehall.com)

01924 523204

When the DSL is absent, the DDSL will act as cover.

Miss R Haigh - Deputy DSL

Head of year DDSL - Ms B Adams, Mrs L Bonham, Mr C Jackson, Mrs C Ennis, Miss R Ward

If the DSL and DDSL(s) are not available, Paul Brook, Headteacher will act as cover (for example, during out-of-hours/out-of-term activities).

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

The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

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

- “DSLs should help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including those with a social worker) are experiencing, or have experienced, with teachers and other staff.
  
- This could be done by, for example:
  - Making sure that staff know who these children are, understand their academic progress and attainment, and maintain a culture of high aspirations for them
  - Supporting teaching staff to identify the challenges that children in this group might face, and the additional academic support and adjustments that they could make to best support them

### **5.3 The local governing board**

The governing board will:

Facilitate a whole-academy approach to safeguarding, ensuring that safeguarding and child protection are at the forefront 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 headteacher to account for its implementation

Appoint a senior board level (or equivalent) lead [or, 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

Alok Krishnan is the Governor responsible for safeguarding.

Pat McDermott is the nominated Trustee for safeguarding.

The chair of governors will act as the ‘case manager’ in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3) PShire@castlehall.com.

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.

All Governors will complete the whole academy safeguarding training. Receive updates on safeguarding at all Governor’s meetings. The safeguarding Governor will meet half termly with the DSL.

### **5.4 The headteacher**

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

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- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents 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 update this regularly and record it on the academy's training log. HR will be responsible for updating the safeguarding training log and informing staff when training requires updating.

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer. (**Appendix 3**)

- The case manager will gather as much information about the alleged incident as necessary in order to establish whether there is substance to the allegation. The case manager must use the local authority designated officer (LADO) notification form

<https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/safeguarding-processes-and-systems/lado-local-authority-designated-officer/>

in order to assess the level of concern. As part of this initial consideration, the case manager should consult with their academy's Human Resources Advisor/provider/contact. The completed LADO notification form must be sent to [lado.cases@kirklees.gov.uk](mailto:lado.cases@kirklees.gov.uk) **within one working day of the allegation being made**. This will assist the case manager and HR in consultation with the LADO to decide on the most appropriate course of action

- The case manager **will not** carry out an investigation or **directly interview** an individual about whom there is a concern until the above process has been duly completed and relevant partners have been consulted
- A multi-agency allegations management meeting may be arranged to look at the complaint in its widest context. The case manager will attend this meeting, which will be arranged by the LADO. All issues must be recorded, and the outcome reached must be noted before the case is closed
- In many cases it may be appropriate to provide further training and support to staff/volunteers and ensure that they are clear about the expectations for their conduct
- In more serious cases, allegations may be investigated under the formal disciplinary procedures and where allegations are upheld, formal warnings issued as well as specific training and support. In cases where pupils may be

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at further risk gross misconduct, suspension of the member of staff may be appropriate and should be considered in line with the academy's Disciplinary Policy

- Any staff or volunteers who are dismissed by the academy for gross misconduct or cumulative misconduct relating to safeguarding of pupils will be referred to the Disclosure and Barring Service for consideration of barring. Similarly, where the academy has a reasonable belief that the member of staff/volunteer would have been dismissed by the academy had they been employed at the time of the conclusion of investigations, they will be referred to the DBS. The academy will keep written records of all the above

**The LADO can also be contacted in emergencies on 01484 221 126**

**6. Confidentiality**

The *Staff Policy Handbook for the IMPACT Education Multi-Academy Trust* e.g., Staff code of conduct. P.36-41.

Disciplinary Procedure. Pages 42-51.

See Staff Policy Handbook for IMPACT Education MAT. Part 5. Data Protection and personal data. Pages 192-208

Confidentiality is an issue that needs to be understood by all those working with pupils particularly in the context of safeguarding

Castle Hall Academy recognises that the only purpose of confidentiality in this respect is to benefit the pupil. Staff, volunteers and visitors to academy should never promise a pupil that they will not tell anyone about an allegation or disclosure and must pass any cause for concerns immediately to a designated safeguarding lead, this also includes disclosures of pregnancy.

**Information sharing and GDPR**

- Timely information sharing is essential for effective safeguarding. This academy will share safeguarding information as appropriate in keeping with the principles outlined in the government guidance document, [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(DfE 2018\)](#). This guidance has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being. This includes sharing information with our safeguarding partners.

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- The storing and processing of personal data is governed by the General Data Protection Regulations 2017 (GDPR) and Data Protection Act 2018. This academy will give clear advice to staff about their responsibilities under this legislation so that, when considering sharing confidential information, those principles should apply.
- 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 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.
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3.

Staff may have access to special category personal data about pupils and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them.

**Working with parents and other agencies to protect children**

Parents/carers should be aware that our academy will take any reasonable action to safeguard the welfare of its pupils. In cases where the academy has reason to be concerned that a child may be suffering significant harm, ill treatment or neglect or other forms of harm, staff have no alternative but to follow the Kirklees Safeguarding Children's Partnership procedures and contact the duty and advice team to discuss their concerns.

In keeping with Keeping Children Safe in Education (KCSiE) we will endeavour wherever possible to obtain at least two emergency contacts for every child in the academy in case of emergencies, and in case there are welfare concerns at the home.



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In general, we will discuss concerns with parents/carers before approaching other agencies and will seek to inform parents/carers and receive their consent when making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the designated safeguarding lead. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents/carers of a referral to another agency may increase the risk of significant harm to the pupil

Parents/carers are informed about our safeguarding policy through academy prospectus, website, newsletters etc. A safeguarding and child protection statement is prominent in the academy foyer/reception area

## **7. 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)”.

### **7.1 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 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. Please follow the directions on the following website

<https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/safeguarding-processes-and-systems/duty-and-advice/>

<https://www.gov.uk/report-child-abuse-to-local-council>

### **7.2 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. 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

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**7.3 If you discover that FGM has taken place or a pupil is at risk of FGM**

The Department for Education's 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.

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, 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 must speak to the DSL and follow our local safeguarding procedures. Details can be found on the following website.

<https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/different-types-of-abuse/female-genital-mutilation/>

**7.4 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)**

Figure 1 on page 13 illustrates the procedure to follow if you have any concerns about a child's welfare.

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.

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**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be



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required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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.

<https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/safeguarding-processes-and-systems/early-support/>

**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 (see section 7.1), 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.

<https://www.kirkleessafeguardingchildren.co.uk/escalation-process/>

**7.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

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](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group



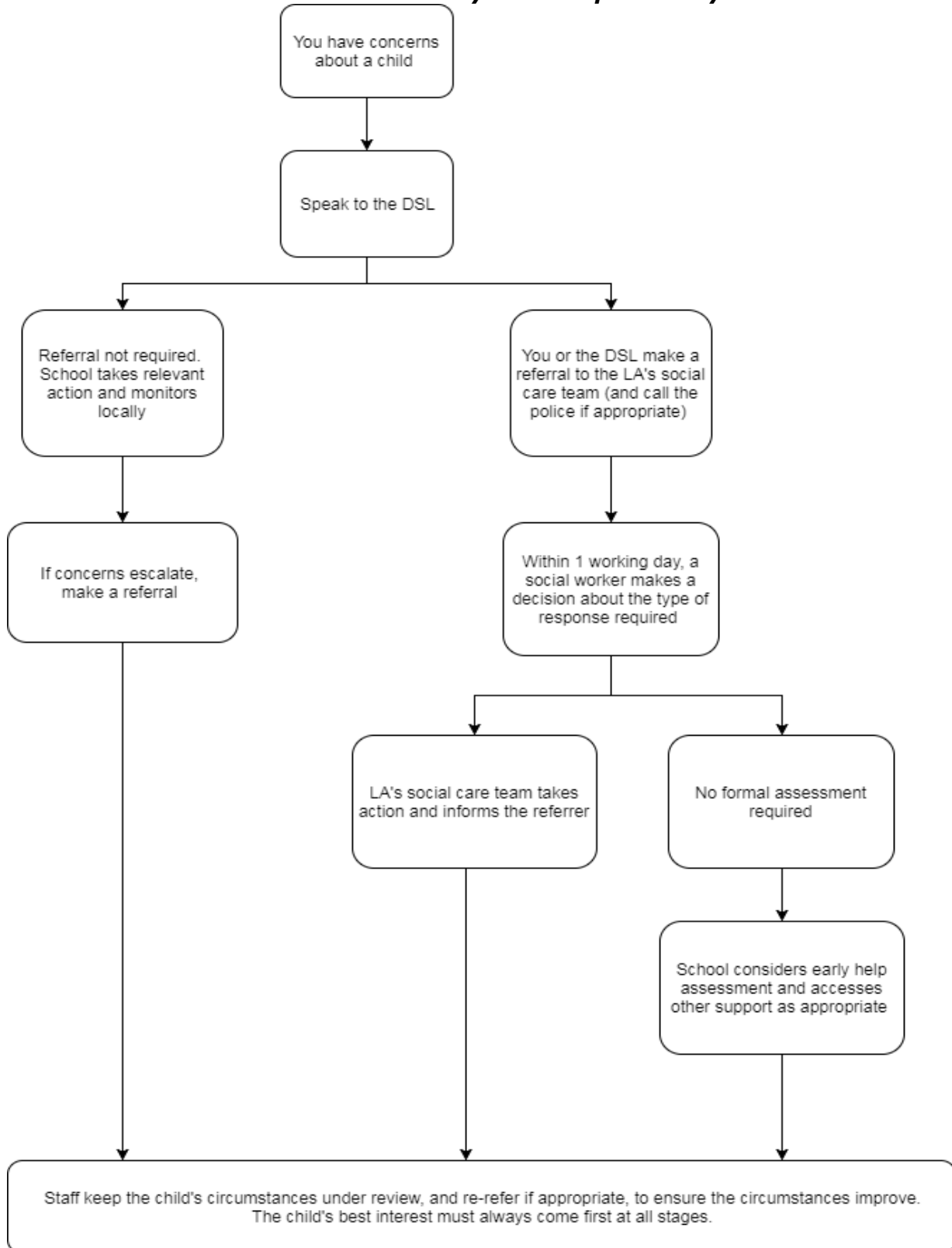
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➤ See or hear something that may be terrorist-related

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note –if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.

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## **7.6 Concerns about a staff member, supply teacher, contractor or volunteer**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors. The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO)

## **7.7 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 peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our academy'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 (See KCSIE 2020 p.94) or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about peer-on-peer abuse.

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

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- 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
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Castle Hall Academy will make a referral through Thrive Kirklees

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being 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
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by reporting any concerns to a member of the academy safeguarding team. This is shared weekly in lesson one and on posters around the academy. Students understand what behaviours are acceptable towards them and others and this is explicitly taught in personal development lessons.
- Ensuring staff are trained to understand 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

## **7. Sharing of nudes and semi-nudes (Sexting)**

### **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)

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- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

**Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate 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 aim to determine:

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery 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 imagery is under 13



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- 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 headteacher 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.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

**Informing parents**

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

**Referring to the police**

If it is necessary to refer an incident to the police, this will be done through reporting the incident to a police community support officer, local neighbourhood police or dialling 101]

<https://www.safe4me.co.uk/portfolio/when-to-call-the-police/>

**Recording incidents**

All incidents of sharing nudes and semi-nudes, and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sharing nudes and semi nudes. These will be recorded on CPOMS.

**Curriculum coverage**

Pupils are taught about the issues surrounding sharing of nudes and semi nudes as part of our Personal education and computing programmes. 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
- Issues of legality
- The risk of damage to people's feelings and reputation

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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 sharing 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.

## **8. Notifying parents**

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents 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 of all the children involved.

### **8.1. 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

Pupils can report concerns any member of staff in the academy and they are aware that this may need to be passed on to a member of the safeguarding team. This can be done in person or via the academy email. All pupils have a safeguarding information lesson during personal development at the start of each academic year.

## **9. Pupils with special educational needs and disabilities**

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. 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 disability without further exploration

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- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities. This includes: Personal development lessons in FOCUS. All students have an allocated keyworker. Pupil profiles are updated each cycle for staff to use when teaching students with SEND. Referrals to outside agencies, Inclusion and pastoral team of staff. A range of interventions for all 4 broad areas of SEND.

## **10. Online safety and the use of mobile technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our academy aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole academy community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole academy community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as 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

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- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to academy for their own use, but will limit such use.
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in academy, use of the academy's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the academy's IT systems

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- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our academy community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our academy's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

<https://www.castlehall.com/e-safety/>

**Mobile phones and cameras**

Staff are allowed to bring their personal phones to academy for their own use but will limit such use to non-contact time when pupils are not present.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the academy. Also see the Trust's Staff Policy Handbook.

As part of our academy activities, we may take photographs and record images of individuals within our academy. These will always be on a trusted device owned by the academy. We will obtain written consent from parents/carers, or pupils aged 18 and over, for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil. Uses may include:

- Within academy on notice boards and in academy magazines, brochures, newsletters, etc.
- Outside of academy by external agencies such as the academy photographer, newspapers, campaigns
- Online on our academy website or social media pages
- Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further. When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

Students are not permitted to use their mobile phone anywhere on the academy site. (see CHA culture/behaviour policy).

10.1 Looked-after and previously looked-after children

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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 academy 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 academy 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

## **11. Complaints and concerns about academy safeguarding policies**

### **11.1 Complaints against staff**

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

### **11.2 Other complaints**

Please see complaints policy

<https://www.castlehall.com/academy-information/>

### **11.3 Whistleblowing.**



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Refer to the Trust's Staff Policy Handbook on Whistleblowing on Pages 87-92.

## **12. 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

Non-confidential records will be easily 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.

If a child for whom the academy has, or has had, safeguarding concerns moves to another academy, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. 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 academy and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Child protection and safeguarding records will be held securely, with access being restricted to the designated safeguarding lead and their deputies, head teacher and in cases of Early Support, the nominated lead professional, if this is not a designated safeguarding lead/officer. For further information please see [Early Support Assessments \(http://www.kirkleessafeguardingchildren.co.uk/early-support-assessment.html\)](http://www.kirkleessafeguardingchildren.co.uk/early-support-assessment.html) The following information must be kept securely with restricted access, whether paper or electronic:

- Chronology (summary of significant events and the actions and involvement of the academy/college)
- All completed child protection cause for concern records (Appendix 3)
- Any child protection information received from the child's previous educational establishment
- Records of discussions, telephone calls and meetings with colleagues and other agencies or services
- Professional consultations
- Letters and emails sent and received relating to child protection matters

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- Referral forms sent to Duty and Advice, other external agencies or education-based services
- Minutes or notes of meetings, e.g. child protection conferences, core group meetings, etc., copied to the file of each child in the family, as appropriate
- Formal plans for, or linked to, the child e.g. Child Protection Plans, Early Support risk assessments etc
- A copy of any support plan for the pupil concerned will be uploaded and recorded on CPOMS
- When a pupil leaves this academy we will ensure that the child protection file is transferred securely and separately from the main pupil file to the receiving academy/educational establishment (where this is known) as soon as possible and within 15 academy days. This is a legal requirement set out under regulation 9 (3) of 'The Education (Pupil Information – England) Regulations 2005. A copy of the chronology will be retained for audit purposes
- When there is an existing risk management plan/assessment in place for behaviours that are deemed potentially harmful to the pupil or others (i.e. self-harming or harmful sexualised behaviour), this information will be shared with the destination provision prior to the pupil starting so that appropriate care and control measures can be put in place to mitigate the potential of any risk of further harm occurring. The designated safeguarding lead will consider if it would be appropriate to share any information with the new academy or college in advance of a child leaving, for example prior to a transfer programme. **When a child leaves academy before statutory academy leaving age, the child protection file will be transferred to the new academy or college.** There is no need for this academy to keep written or electronic copies of the child protection records, therefore these will be deleted from electronic systems once the successful transfer has been confirmed. The exception to this rule will be in any of the following instances:
  - When a vulnerable young person is moving to a further education establishment, consideration will be given to the pupil's wishes and feelings about their child protection information being passed on, in order that the FE establishment can provide appropriate support. In cases when it is deemed appropriate, relevant child protection information will be shared via the FE Safeguarding Information Sharing Form (Appendix 9). The original records will be retained and archived by this academy/college. Due consideration will be given to the sharing of any additional information requested by the receiving establishment
  - When the destination academy is not known (*the original records should be retained by the academy*)
  - When the child has not attended the nominated academy (*the original records should be retained by the academy*)
  - There is any on-going legal action (*the original file should be retained by the academy and a copy sent*)



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- Pupil records will be transferred in a secure manner, for example, through secure electronic file transfer or by hand. When hand-delivering pupil records, a list of the names of those pupils whose records are being transferred and the name of the academy/college they are being transferred to will be made and a signature obtained from the receiving academy/college as proof of receipt. When sending records through secure electronic file transfer, a delivery and read receipt of the transfer will be retained for audit purposes
  - If a pupil moves from our academy, child protection records will be forwarded onto the named designated safeguarding lead at the new academy, with due regard to their confidential nature. Good practice suggests that this should always be done with a face to face handover between designated staff or a verbal conversation is had over the telephone if a face to face handover is not possible. A signed receipt of file transfer or an electronic delivery and read receipt must be obtained for audit purposes by the delivering academy
  - When sending by post, pupil's records will be sent "Special Delivery". A **note** of the special delivery number should also be made to enable the records to be tracked and traced via Royal Mail
- 
- For audit purposes a note of all pupil records transferred or received will be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent, and the date sent and/or received. A copy of the child protection chronology will also be retained for audit purposes and kept securely
  - If a pupil is permanently excluded and moves to an alternative or specialist provision, child protection records will be forwarded onto the relevant organisation in accordance with the 'The Education (Pupil Information – England) Regulations 2005, following the above procedure for delivery of the records
  - When a designated safeguarding lead member of staff resigns their post or no longer has child protection responsibility, there will be a full face to face handover/exchange of information with the new post holder
  - In exceptional circumstances when a face to face handover is unfeasible, it is the responsibility of the Headteacher to ensure that the new post holder is fully conversant with all procedures and case files
  - All designated safeguarding leads receiving current (live) files or closed files will keep all contents enclosed and not remove any material
  - All receipts confirming file transfer will be kept in accordance with the recommended academy retention periods. For further information refer to the archiving section

**Archiving**

The academy that the pupil attended until statutory academy leaving age (or the academy where the pupil completed sixth form studies) is responsible for retaining

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any child protection records they may hold. The recommended retention periods is 35 years from closure when there has been a referral to Duty and Advice. If no referral has been made to Duty and Advice the child protection record should be retained until the child's 25th birthday, after which point the file will be destroyed confidentially/deleted from our academy electronic system. The decision of how and where to store child protection files must be made by our academy via our governing body. Due to sensitivity of the information, the records should continue to be held in a secure area with limited access e.g. designated officer or head teacher. The DSL is responsible for ensuring that all child protection files are archived in accordance with the timescales referenced above. The designated safeguarding lead is responsible for ensuring that the appropriate timeframes for archiving and destroying child protection records referenced above are set on electronic systems accordingly for each pupil.

**Child and parent access to child protection files**

Under Data Protection legislation (General Data Protection Regulation & Data Protection Act 2018) a pupil or their nominated representative have several legal rights in respect of information relating to them. These rights include the right to access and the right to rectification of inaccurate data. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner

Any pupil who has a child protection file has a right to request access to it. However, neither the pupil nor the parent has an automatic right to see all the information held in child protection records. Information can be withheld if disclosure:

- Could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person
- Could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child
- Is likely to prejudice an on-going criminal investigation
- Information about the child also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority
- It is best practice to make reports available to the child or their parents unless the exceptions described above apply. If an application is made to see the whole record, advice can be sought from the Local Authority
- The establishment's report to the child protection conference should be shared with the child, if old enough, and parent at least two days before the conference



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## **Safe destruction of the pupil record**

Where records have been identified for destruction, they will be disposed of securely at the end of the academic year (or as soon as practical before that time). Records which have been identified for destruction should be confidentially destroyed. This is because they will either contain personal or sensitive information, which is subject to the requirements of Data Protection legislation or they will contain information which is confidential to our academy or the Local Authority. Information should be shredded (or deleted as appropriate) prior to disposal or confidential disposal can be arranged through private contractors. For audit purposes the academy will maintain a list of records which have been destroyed and who authorised their destruction. This can be kept securely in either paper or an electronic format.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## **13. Training**

### **3.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, 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 in line with advice from the 3 safeguarding partners.

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.

- 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.

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- 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.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins, 'hot-topics' and staff meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### **13.2 The DSL and deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### **13.3 Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

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 headteacher, they receive training in managing allegations for this purpose.

### **13.4 Recruitment – interview panels**

At least one person conducting any interview for a post at the academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, the current Keeping Children Safe in Education guidance, and will be in line with local safeguarding procedures. See Part One, section 1.2. Page 6 of our staff Policy Handbook for more information about our safer recruitment procedures

### **13.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

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#### **14. Monitoring arrangements**

This policy will be reviewed **annually** by Paul Brook Headteacher. At every review, it will be approved by the full governing board.

#### **15. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour
- Culture and Ethos policy
- Staff Code of Conduct.
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- First aid
- Curriculum
- Privacy notices
- IT acceptable use policy
- Designated teacher for looked after and previously looked after children
- Privacy notices
- Anti-bullying policy

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

#### **Appendix 1: types of abuse**

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**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** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level

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

Emotional abuse may involve:

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

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- 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** 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.



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## **Appendix 2: safer recruitment and DBS checks – policy and procedures**

See our Recruitment Policy in the Trust's Staff Policy Handbook. Part 1 section 1.2 on Pages 6-19 for procedures to be followed.

'Where an allegation is made against a supply teacher, the Headteacher Paul Brook will immediately contact both the agency concerned and the LADO. The academy will continue to support any investigation that is required or take the lead with the agreement of the relevant agency.'

### **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 academies abroad to ensure that similar assurances are undertaken prior to the visit.

## **Appendix 3: allegations of abuse made against staff**

We follow the Disciplinary Procedure on Pages 42-51 of the Trust's Staff Policy Handbook.

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

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 he or she 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 academy

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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 headteacher, or the chair of governors where the headteacher 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 academy 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



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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,

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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 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

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

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academy'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

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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

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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

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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.

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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

Reporting Low-Level Safeguarding Concerns Policy

1. Statement of intent

1.1. Impact Education Trust ("the Trust") understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. While a concern may be low-level, that concern can escalate over time to become much more serious.

1.2. The aim of this policy is to contribute to embedding a safeguarding culture in which the clear values and expected behaviours (which are set out in our Code of Conduct) are lived, perceived, and constantly monitored by all staff.

1.3. Specifically, this means to:

- Creating a safe environment for pupils;
- Maintain a culture of openness, trust and transparency;
- Ensure that staff are confident and clear about expected behaviours of themselves and their colleagues, and reporting lines;
- Ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be understood as falling short of the standards set out in our Code of Conduct;
- Enable responsive, sensitive and proportionate handling of such concerns when they are raised;
- Maintain on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

2. What is a low-level concern, including those that are self-reports?

2.1. For the purposes of this policy, a "low-level concern" is defined as any concern had about an individual's behaviour towards a child that does not meet the threshold for being considered an allegation (see below), or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns often refer to behaviour on the part of an individual that is considered inappropriate in line with statutory safeguarding advice and the Trust's Code of Conduct. A low-level concern could be a concern, no matter how small and even if no more than a

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'nagging doubt' including a sense of unease as to the individual's behaviour particularly towards or around children.

2.2. Low-level concerns are differentiated from allegations. "Allegations" are defined in this policy as accusations that an adult has:

2.2.1. behaved in a way that has harmed a child or may have harmed a child; and / or

2.2.2. possibly committed a criminal offence against, or related to, a child; and / or

2.2.3. behaved towards a child in a way that indicates they may pose a potential risk of harm to children; and / or

2.2.4. behaved or may have behaved in a way that indicates they may not be suitable to work with children (Keeping Children Safe in Education 2021, page 81 paragraph 338); and / or

2.2.5. there is a pattern of low-level concerns which collectively amount to an allegation; and / or

2.2.6. there is other information which, when considered, leads to an allegation.

2.3. While low-level concerns are, by their nature, less serious than allegations, the Trust understands that many serious safeguarding concerns (for example child sexual abuse), often begin with low-level concerns, such as subtle grooming by the offender. The Trust will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

### 3. Self-reporting Low level concerns about an adult

3.1. From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Where a staff member wishes to work outside of their contract with the academy, they should first seek agreement with their Headteacher, and a written confirmation placed in their employee file.

3.2. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.



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3.3. As such, the academy sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

4. Low-level concerns about others

4.1. The Trust understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors.

4.2. From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

4.3. The Trust will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the academy / academy community, e.g. pupils are not treated as friends and an appropriate professional distance and approach is maintained by staff.

4.4. The Trust will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted, as necessary. The Trust will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

5. What should I do if I have one?

5.1. The Trust will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns to the Headteacher regardless of whether they relate to a fellow member of staff.

5.2. Where a low-level concern (including self-reports) exists:-

5.2.1. it should be reported to the Headteacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).

5.2.2. If there are concerns about the Headteacher then these should be reported to the CEO.

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5.3. Staff members should report their concerns by submitting a Low-level Concern Reporting Form.

5.4. Staff members may request anonymity when reporting a concern, and the Trust will endeavour to respect this as far as possible. However, the Trust would encourage staff to feel comfortable about voicing any concerns openly. Completely anonymous disclosures are difficult to investigate. If a staff member wants to raise their concern confidentially, then the Trust will make every effort to keep their identity secret and only reveal it where necessary to those involved in investigating the concern. Staff will be protected from potential repercussions caused by reporting a genuine concern. However, if we conclude that a false allegation has been maliciously made, then the individual concerned may be subject to disciplinary action.

6. How will a low-level concern be handled (including self-report)?

6.1. The Headteacher will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure.

6.2. Where the Headteacher is in any doubt whatsoever, advice will be sought from the DSL. If necessary this may be on a no-names basis.

7. Acting on concerns

7.1. Where it is determined that a concern is low-level, the Trust will respond in a sensitive and proportionate manner. The following procedure will be followed:

7.2. The DSL and or Headteacher will hold a meeting with the individual about whom the concern was reported, during which they will:

7.3. Talk to the individual in a non-accusatory and sympathetic manner.

7.3.1. Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).

7.3.2. Clearly state what about their behaviour was inappropriate and problematic.

7.3.3. Discuss the reasons for the behaviour with the individual.

7.3.4. Inform the individual clearly what about their behaviour needs to change.

7.3.5. Discuss any support that the individual may require in order to achieve the proper standards of behaviour.

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7.3.6. Allow the individual the opportunity to respond to the concern in their own words.

7.4. The headteacher will consider whether the individual should receive guidance, supervision or any further training.

7.5. Where considered appropriate in the circumstances, the Headteacher may ask the DSL to develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.

7.6. Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly and information will only be disclosed to individuals on a need-to-know basis.

7.7. Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

7.8. The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated.

7.9. Where the Headteacher decides upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation.

8. What records will be kept?

8.1. Where a low-level concern has been communicated, or a self-report raised by an individual about themselves, a confidential record will be kept in a central file which logs all low-level concerns and will be retained until the staff member reaches normal pension age or 10 years after if longer. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

8.1.1. the concern (or group of concerns) has been reclassified as an allegation as above; or

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8.1.2. the concern (or group of concerns) is sufficiently serious to result in formal action under the academy's grievance, capability or disciplinary procedure.

9. Monitoring and review

9.1. This policy will be reviewed annually by the Trust, and in response to any new safeguarding guidance or legislation.

**Appendix 4: specific safeguarding issues**

This academy follows the Kirklees Safeguarding Children Partnership (<https://www.kirkleessafeguardingchildren.co.uk/>) online multi-agency procedures and will, where necessary, have due regard to the government guidance for children in specific circumstances as outlined in Part 1 and Annex A of Keeping Children Safe in Education (KCSiE)

**Children missing from education**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a academy
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the academy without a new academy being named and

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adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

#### Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing academy or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

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### Child sexual exploitation

Child sexual exploitation Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

**So-called 'honour-based' violence (including FGM and forced marriage)**

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

**FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from academy, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

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- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from academy
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

## **Domestic Abuse**

Domestic abuse 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.



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Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. 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.

Older children may also experience domestic abuse and/or violence in their own personal relationships. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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 academy (usually the designated safeguarding lead) before the child or children arrive at 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 circumstance

Castle Hall Academy is aware of and follow the [Kirklees Joint Agency protocol for domestic violence and abuse – \(Operation Encompass Academy notification\)](#) contact numbers for this must be kept updated by emailing [Education.safeguardingteam@kirklees.gov.uk](mailto:Education.safeguardingteam@kirklees.gov.uk)

**Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one 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](mailto:fm@fco.gov.uk)

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- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or academy counsellor, as appropriate

Preventing radicalisation

Preventing radicalisation

- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- Terrorism is an action that:
  - Endangers or causes serious violence to a person/people; ·
  - Causes serious damage to property; or ·
  - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Academies have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our academy being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at academy and at home. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

Further information on the academy's measures to prevent radicalisation are set out in other academy policies and procedures,

Further information on the academy's measures to prevent radicalisation are set out in other academy policies and procedures, including curriculum policy, behaviour policy, online/e-safety policy. The academy has also completed a PREVENT risk assessment which is contextual to our local area.

**Child Criminal Exploitation: (CCE)**

Young people who are victims of CCE include those who are:

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- Trafficked within the UK with the intention of being used to commit criminal acts that benefit the trade of drugs and criminal gangs
- Coerced into the supply, transporting and dealing of class A drugs. They may be doing this within their local area, however they are often crossing one or more police force or local authority boundaries
- Coerced into carrying drugs, weapons and money to assist in the trade and movement of drugs

CCE often occurs without the child's immediate recognition, and with the child believing they are in control of the situation. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength. Violence, coercion and intimidation are common, involvement of exploitive relationships being characterised in the main by the child/young person's availability of choice resulting from their social/economic and/or emotional vulnerability

### **Peer-on-peer abuse**

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of academy and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)

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- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about peer-on-peer abuse, 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 academy's approach to this type of abuse.

Sexual violence and sexual harassment between children in 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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:

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- 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 academy'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 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 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.

#### **Responses from parents**

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

- An unexpected delay in seeking treatment that is obviously needed
- An 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 her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home
- Violence between adults in the household

**Private fostering** - LA notification when identified

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of academy staff through the normal course of their interaction, and promotion of learning activities, with children.

The academy will then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

See DfE statutory guidance Children Act 1989 Private fostering for comprehensive guidance on private fostering

**Children with Special Educational Needs and Disabilities**

When working with children with disabilities academy staff will to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation

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- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child's finances
- Invasive procedures

**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/number, 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 enhanced DBS check with barred list information has been carried out

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.

**Non-collection of children**

If a child is not collected at the end of the session/day, we will:

- Staff will supervise the child in academy until contact can be made and the child is collected
- Phone and text the parent
- Phone and text all three contacts on file
- Contact any other agencies involved with the family
- A member of staff will visit the home to establish contact
- Contact Duty and Advice
- Contact the police





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- › The incident will be recorded on CPOMS

**Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- › Search the building and surrounding area
- › Contact parents
- › Report to 101
- › Liaise with all agencies
- › Record the incident on CPOMS

**KCSIE 2020:**

**Annex A: Further safeguarding information Pages 82-96**

**Annex B: Role of the designated safeguarding lead Pages 97-101**

**Annex C: Online safety Pages 102-106**

**Annex E: Host families - homestay during exchange visits Pages 108-110**

**Annex F: Statutory guidance - Regulated activity (children) - Supervision of activity with children which is regulated activity when unsupervised Pages 111-113**

**Annex G: Disclosure and Barring Service checks Pages 114-118.**