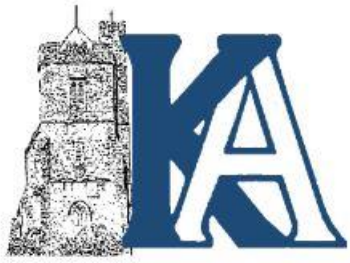
'They will soar on wings like eagles …'

Isaiah 40:31

collaborate | enrich | trust | innovate | aspire |nurture

AQUILA Diocese of Canterbury Academies Trust



Multi Academy Trust Policy

Common Trust Policy, Use as Published

Child Protection and Safeguarding Policy

Date adopted by Trust Board: 09/2024

Date of Review: 07/2025

Date of next Review: 09/2026

Version	Date	Author	Change Description
V2	7.2025	AW	Update in line with KCSiE 2025, including clarification about AP, addendum 2024 added as appendix 2

DSL Name
DDSL Names
Designated Teacher Name
Nominated adult for Operation Encompass
Safeguarding Governor

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1. Trust Approach to Safeguarding

At Aquila, The Diocese of Canterbury Academies Trust, our overarching responsibility is to protect each and every person within our member academies. Our commitment to ensuring a cross Trust approach to safeguarding practices means that the base principles of this policy will be the same in each of our Academies. However, the trust recognises the unique context of each of our members and, as such, the Academy will tailor this policy to its own context. Where there are references to the associated policies and where documents are kept, for example, will apply to the context of each Academy within the Trust. We regard safeguarding as a key priority and therefore, accountability sits at the highest level of leadership. Within this policy, we refer to Headteacher, but this should be taken to mean Executive Headteacher where one is in post.

The policy has been written for all our schools with our core values at its heart, but more specifically our values of **collaborate, nurture, trust** and **aspire** and aims to promote a culture of vigilance in each Academy. Additions to this policy outline our commitment to being places of learning nurtured by an understanding of our Academies as places of sanctuary and in the case of our schools with a Christian Foundation, places of distinctiveness with God's love and the teachings of Jesus at the heart of all they do.

"For I know the plans I have for you, declares the Lord, plans for welfare and not for evil, to give you a future and a hope." Jeremiah 29:11

Any reference to 'School' within this document means an Academy within the Trust

2. Ethos and Values

Every Aquila school is a community and all those directly connected (staff, governors, parents, families and pupils) have an essential role to play in making it safe and secure. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children with their best interests at the centre of our work.

Every Aquila school recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

Our core safeguarding principles are:

- That schools are an important part of the wider safeguarding system for children.
- It is a whole school responsibility to safeguard and promote the welfare of children as its paramount concern.
- All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All children have a right to be heard and to have their wishes and feelings taken into account
- All staff understand safe professional practice and adhere to our code of conduct (found in the Staff Handbook, including acceptable use of technology) and other associated policies.
- All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance.

- All staff should have an attitude of 'it could happen here' and will always act in the best interests of the child.

There are four main elements to our safeguarding policy

- **Prevention** (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);
- **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
- **Support** (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
- **Working with parents and other agencies** (to ensure appropriate communications and where appropriate actions are undertaken).

The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and governors and are consistent with those of Kent Safeguarding Children Multi-Agency Partnership (KSCMP).

3. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

4. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education and Working Together to Safeguard Children, and the academy trust governance guide We comply with this guidance and the procedures set out by our local safeguarding children board.

This policy is also based on the following legislation:

- Section 175 of the **Education Act 2002**, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- **The School Staffing (England) Regulations 2009**, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques:
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- **The Children Act 1989** (and **2004 amendment**), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the **Serious Crime Act 2015**, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out
- **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 school and trusts' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and

extremism

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

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage and the departmental advice
What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

As an Academy, this policy also complies with our funding agreement and articles of association.

NB. KCSiE 2025 (Published July 2025) The draft guidance signals forthcoming linkages to updated statutory guidance on Relationships, Sex and Health Education (RSHE) and Supporting pupils who are questioning their gender
These links are expected to appear in the final KCSIE edition published in September 2025.

KCSIE 2025 indicates that future substantive updates will reflect new provisions under:
The Children's Wellbeing and Schools Bill

Findings from the National Audit on group-based child sexual exploitation
The Violence Against Women and Girls Strategy
These are expected to influence later versions of KCSIE beyond the technical July release

5. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems arise
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- 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.

Sexual abuse is defined in detail in Appendix 1 and may include **Sexting or Youth Produced Sexual Imagery.** Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. Children includes everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

We acknowledge that this policy will incorporate a range of specific safeguarding issues including (but not limited to): (See also section 22 of this policy)

- Bullying (including cyberbullying)
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Contextual Safeguarding
- Criminal Exploitation of Children and Vulnerable Adults (County Lines)
- Domestic violence
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence
- Hate
- Honour based abuse
- Mental health
- Missing children and adults
- Online safety
- Prevent duty (radicalisation and extremism)
- Private fostering
- Relationship abuse
- Human trafficking and modern slavery
- Youth produced sexual imagery or "Sexting"

Every member of Aquila staff recognises that children experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting children from any other risks.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where it is known that children have suffered abuse, neglect and exploitation or other potentially traumatic adverse childhood experiences, this can impact on their mental health, behaviour and education. Our school will identify the additional needs of these children and provide extra monitoring and pastoral support to mitigate these additional barriers. Where necessary, referrals will be made to Aquila mental health professionals for further support.

6. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 11)

7. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the trust and is consistent with the procedures of Kent Safeguarding Children multi-agency partnership Board (KSCMP). The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on the KSCMP website www.kscmp.org.uk. Our policy and procedures also apply to extended school and off-site activities.

7.1 All staff

Staff who work directly with children 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.

Staff who do not work directly with children will read and understand Annex A of Keeping Children Safe in Education. 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 the Aquila staff handbook, the role of the designated safeguarding lead (DSL), the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education. All staff have a responsibility to feed into improvements to processes within individual schools.
- 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 under the Children Act 1989, especially section 17 (children in need) and section 47 (child protection) 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 discusses something likely to indicate that they are being abused, exploited, 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, neglect and exploitation, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk of FGM, and extra-familial and/ or contextual risks which can occur outside of the family, e.g., sexual abuse, domestic abuse, criminal exploitation, serious youth violence, county lines and radicalisation. Staff will exercise professional curiosity in this area and understand that such issues are rarely standalone ones.
- The need for vigilance around mental health issues for children. These may be an indicator of harm or abuse, or where it is known that a child has suffered harm or abuse this may impact on their mental health, behaviour and education.
- That technology is a significant component in many safeguarding and wellbeing issues and the risks young people face, staff will undergo training on online safety and filtering and monitoring

- The importance of reassuring victims that they are being taken seriously and that they will be supported.
- How to report concerns about another member of staff (including supply staff, volunteers and contractors) harming or posing a risk of harm to children through the following process:
    - Headteacher
    - Concerns about the Headteacher to the Chair of Governors, Chair of the Management Committee or Proprietor of an Independent School, and
    - The ability to report directly to the LADO (local authority designated officer) if there are any conflicts of interest
    - Where staff are unsure, they should always speak to the DSL or deputy

Section 20 and appendix 4 of this policy outline in more detail how staff are supported to do this.

7.2 The designated safeguarding lead (DSL)

The DSL for each individual school is named on the front cover of this policy and on the school website. The DSL takes lead responsibility for child protection and wider safeguarding.

Our deputy DSLs are also named on the cover of the policy and on the school website.

During term time, the DSL or deputy will be available during school hours for staff to discuss any safeguarding concerns. In exceptional circumstances, the DSL may also be contacted by Skype, Zoom or Teams.

When the DSL is absent, the deputy DSL (DSLs) named on the front of this policy will act as cover.

If both the DSL and deputy / deputies are not available, speak to the most senior member of staff on the school site who will act as cover (for example, during out-of-hours/out-of-term activities). In emergencies, contact the central team and ask to speak to a DSL trained member of staff.

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 Head Teacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL are set out in their job description and are in Annex C of KCSIE which staff should refer to for more detail on this role

7.3 The Trust Board

The Trust Board will evaluate and approve this policy at each review, ensuring it complies with the law, and holds the headteacher to account for its implementation.

The Board will facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development

The Trust has its own DSL who will take an overview of safeguarding matters for the trust and or its central team. The DSL is currently Annie Wiles, Chief Executive Officer (CEO) for Aquila The Diocese of Canterbury Academies Trust. Angela Sutton, Head of HR is also a trained DSL.

The trust will also appoint a Trustee to act as safeguarding trustee to monitor the effectiveness of this policy across the trust. This will always be a different person to the DSL. Currently this is Elaine Rose.

The Chair of the Trust Board will act as 'case manager' in the event that an allegation of abuse is made against the CEO, where appropriate (see appendix 3).

All trustees will read all of Keeping Children Safe in Education in line with the expectation on page 4 of KCSiE which states:-

This statutory guidance should be read and followed by:

• proprietors of independent schools (including academies, free schools and alternative provision academies) and non-maintained special schools. In the case of academies, free schools and alternative provision academies, the proprietor will be the academy trust

7.4 The Local Governing Body (LGB)

The Local Governing Body will adopt this policy at each review, and hold the Head Teacher to account for its implementation.

The LGB will appoint a link governor to monitor the effectiveness of this policy in conjunction with the full local governing body. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the head teacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education to ensure best practice with the expectation on page 4 of KCSiE that :-

This statutory guidance should be read and followed by:

• governing bodies of maintained schools (including maintained nursery schools) and colleges which includes providers of post 16 Education as set out in the Apprenticeships, Skills, Children and Learning Act 2009 (as amended): 16-19 Academies, Special Post-16 institutions and Independent Training Providers

as we want our schools to be compliant with the highest standards of safeguarding.

7.5 The Head Teacher / Executive Headteacher

The senior leader in the school is responsible for the implementation of this policy, including ensuring all staff, including temporary staff and all volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction, and that they understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation

The senior leader is also responsible for:

- Communicating this policy to parents when their child joins the school and via the school 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 (at least every year).
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).
- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.
-

7.6 Children and Young People

Children and young people (pupils) should at a level appropriate to their age and ability:

- Contribute to the development of school safeguarding policies (via the school council for example).
- Adhere to the schools safeguarding policies and procedures.
- Be supported in knowing how to get help from a trusted adult if they need it, and support others that may be experiencing safeguarding concerns.

- Develop and take responsibility (at a level that is appropriate to their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online.

7.7 Parents and Carers

Parents/carers have a responsibility to:

- Read the relevant school/policies and procedures, encouraging their children to adhere to them, and adhering to them themselves where appropriate.
- Discuss safeguarding issues with their children, support the school in their safeguarding approaches, and reinforce appropriate safe behaviours at home.
- Identify changes in behaviour which could indicate that their child is at risk of harm online.
- Seek help and support from the school, or other appropriate agencies, if they or their child encounters any safeguarding concern.
- Understand the school's duty and role to make referrals about suspected abuse or neglect
- Contribute to the development of the schools safeguarding policies.

7.8 The role of the LA.

Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required
- any services are required by the child and family and what type of services
- the child is in need and should be assessed under section 17 of the Children Act 1989.
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm and the child assessed under section 47 of the Children Act 1989.
- further specialist assessments are required

The referrer should follow up if this information is not forthcoming.

8. Confidentiality and Information Sharing

All Aquila schools and the central office recognise that all matters relating to child protection are confidential. The Head Teacher or DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep any information about children, families and colleagues which have access to as a result of their role confidential, they also have a professional responsibility to share information with other agencies in order to safeguard children. DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

All staff must be aware that they cannot promise a child to keep secrets that might compromise the child's safety or wellbeing. Further advice on responding to disclosures can be found in appendix 3.

DfE Guidance on Information Sharing 2018 provides further detail.

If the school is made aware of any safeguarding concerns that they feel need to be shared with the wider community (including other local schools) then advice will be sought from the Education Safeguarding team

to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.

9. Recognising abuse and taking action

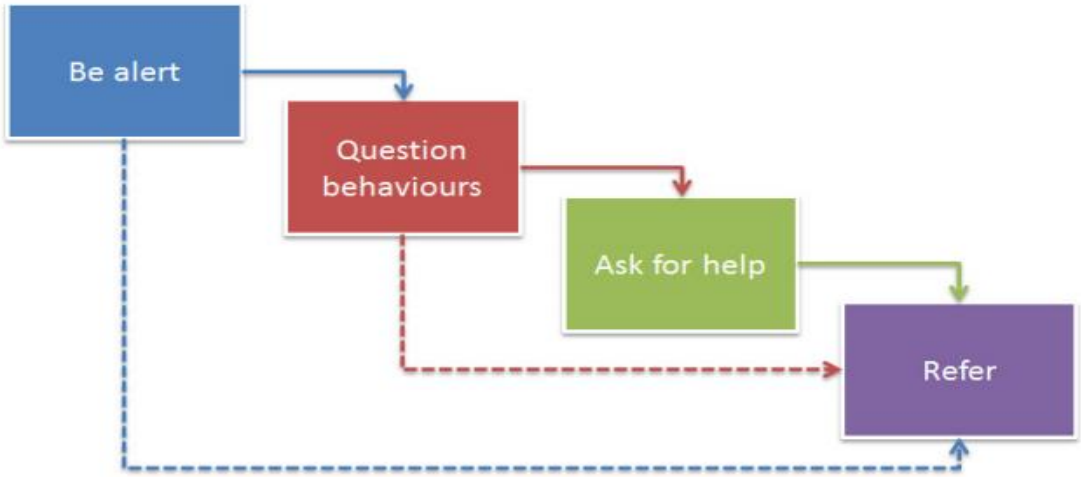
Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

'What to do if you are worried about a child being abused' (DfE 2015 p.12) identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

The summary diagram from this guidance is included below.

All members of staff are expected to be aware of and follow this approach:



9.1 If a child is in immediate danger

Do not delay. Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

9.2 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 in Bromcom as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

- Note the reference number that you are given when you get confirmation in your diary as proof of recording. The concern then goes to the DSL and you can follow up if you wish by quoting the reference.
- If there is an urgent concern, indicate this in the system so the DSL gets an urgent concern notification by e mail with a big red exclamation mark and bold letters to show the urgency.
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

9.3 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 either:

- Is informed that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also record the case in Bromcom and 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, confirm the police will be contacted 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.

9.4 If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 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. Share details of any actions you take with the DSL as soon as practically possible.

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

Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the change of a problem getting worse. 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 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 school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

All staff should know the local early help process and their role in relation to it. They should also know the circumstances students may be in who might benefit from early help. These may include *those with SEND, mental health need, young carers, students showing signs of ASB, frequently going missing from education, home or care, risk of exploitation, risk of radicalisation, parent or carer in custody, affected by parental offending, substance misuse/ adult mental health issues/ domestic abuse within the home, substance misuses themselves, care leaver, risk of honour-based abuse (e.g.FGM or forced marriage), privately fostered, persistently absent from education,has experienced multiple suspensions, is at risk of permanent exclusion and is in alternative provision, is disabled, has health conditions and specific additional needs.*

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.

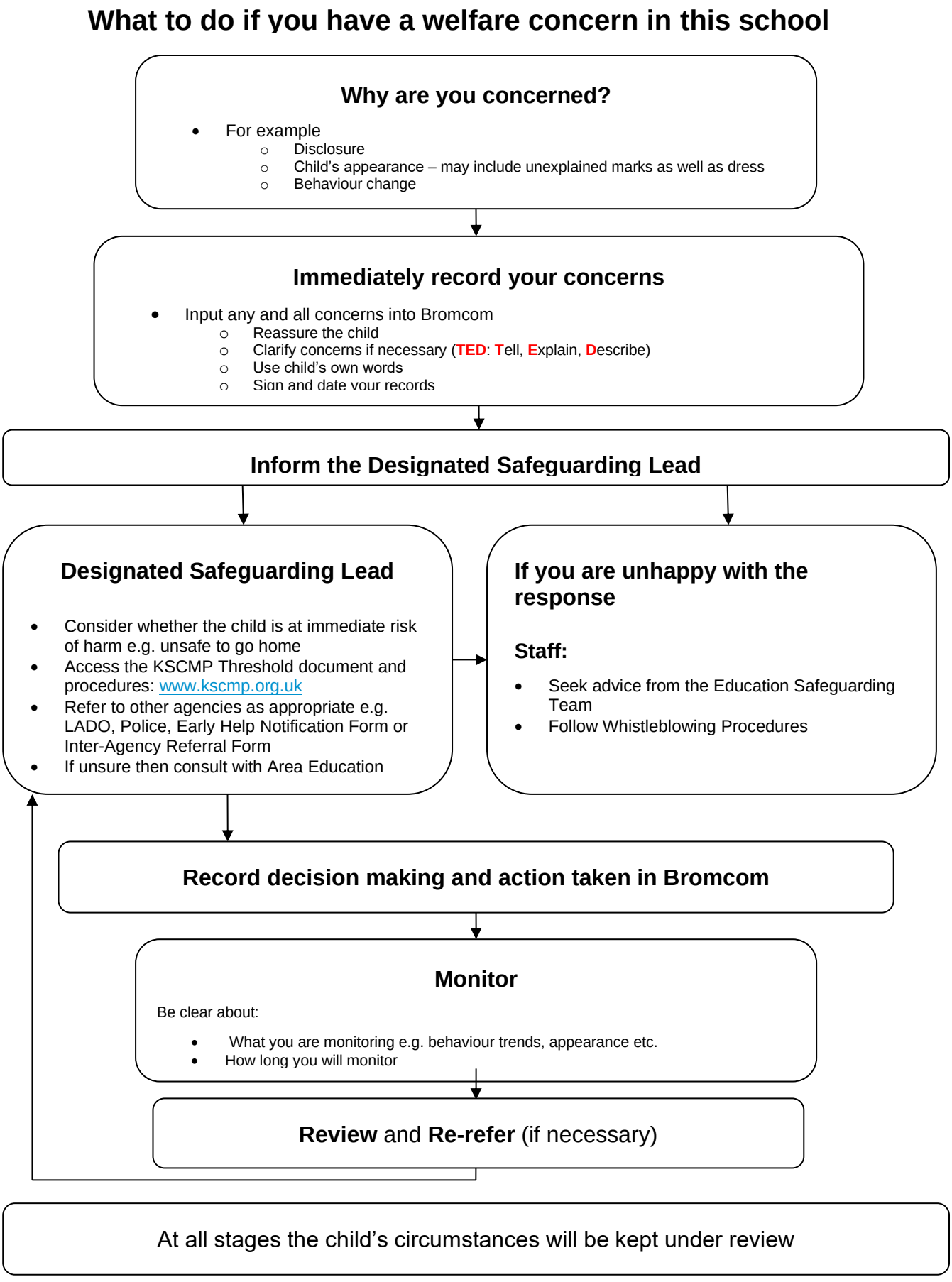
The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and 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.

9.5 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). Inform the DSL or deputy as soon as practically possible after the referral.
- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
- The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- **See or hear something that may be terrorist-related**

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)



9.6 Concerns about a staff member 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 head teacher/chair of governors/DSL 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).

For schools with an early years setting, where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

9.7 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 child on child abuse and that girls are more likely to be victims and boys more likely to be perpetrators. However, all child on child abuse is unacceptable and will be taken seriously.

- Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, which covers the measures taken to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying. 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 school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child on child abuse.

Procedures for dealing with allegations of child on child abuse

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

- You must record the allegation on Bromcom and alert the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment for allegations of sexual violence and where required for sexual harassment and a 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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Not tolerate/ have a zero tolerance approach to abuse, we will never pass it off as 'banter', 'just having a laugh', 'part of growing up', or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. 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. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 9.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child on child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child on child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
- Certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child on child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

We recognise that child on child abuse may also occur within a family.

- 9.8 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)
  - Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
  - Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.
- Initial review meeting
- Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
  - Whether there is an immediate risk to pupil(s)
  - If a referral needs to be made to the police and/or children's social care
  - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
  - What further information is required to decide on the best response
  - Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
  - Whether immediate action should be taken to delete or remove images or videos from devices or online services
  - Any relevant facts about the pupils involved which would influence risk assessment
  - If there is a need to contact another school, college, setting or individual
  - Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
  - The incident involves an adult
  - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
  - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
  - The imagery involves sexual acts and any pupil in the images or videos is under 13
  - The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- If none of the above apply then the DSL, in consultation with the 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 to establish the facts and assess the risks.
- They will hold interviews with the pupils involved (if appropriate).

- If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.
- Informing parents/carers
- The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.
- Referring to the police
- If it is necessary to refer an incident to the po**lice, this will be done through one of these routes:-** a safer schools officer, a police community support officer, local neighbourhood police, dialling 101].
- Recording incidents
- All incidents of sharing of 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 these incidents.
- Curriculum coverage
- Pupils are taught about the issues surrounding the sharing of nude**s and semi-nudes as part of our** relationships 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 and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.
-
- 9.9 Domestic Abuse
- We recognise the impact that domestic abuse will have on pupils. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Concerns about domestic abuse must be recorded.

The school is also part of Operation Encompass, www.operationencompass.org a national initiative that ensures the police share information with the DSL about any domestic abuse incidents where a child has been present. This allows the DSL to provide timely support to the child by the start of the next school day.

- 9.10 Reporting systems for our pupils

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 share their views and give feedback

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 school aims to:

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

In the context of safeguarding and online safety, and as recognised in Keeping Children Safe in Education (2025):

- Misinformation refers to false or inaccurate information that is shared without intent to deceive. It may arise from misunderstandings, incomplete facts, or mistaken beliefs. For example, a pupil sharing an incorrect health claim they believe to be true.
- Disinformation refers to false information that is deliberately created or spread to mislead, manipulate, or cause harm. It is often used to influence opinions, sow division, or exploit individuals for ideological, political, or personal gain.

Both forms of information can be encountered online through social media, messaging apps, video platforms, and AI-generated content. Exposure to misinformation and disinformation can:

- Undermine trust in legitimate sources (e.g., school staff, health professionals)
- Lead to harmful behaviours or radicalisation
- Increase vulnerability to grooming, scams, or extremist narratives
- Distort young people's understanding of current events or their own identity

Filtering and Monitoring System.

Details of the filtering and monitoring system are included in the Online Safety policy.

Scope of Online Risks

The school recognises that online safety is a critical component of safeguarding and promoting the welfare of children. In accordance with Keeping Children Safe in Education (2025), we adopt a comprehensive approach to online safety, acknowledging the full range of potential risks posed by digital platforms and online content.

The 4 key categories of risk

Online risks fall broadly into four categories, with specific attention given to emerging and evolving threats:

Content Risks

Children may be exposed to harmful or inappropriate material online, including:

- pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Violent or sexually explicit material

- Misinformation and disinformation, including false or misleading information designed to confuse or manipulate
- Conspiracy theories that may radicalise or isolate young people from trusted sources
- Material promoting self-harm, eating disorders, or other harmful behaviours
- AI-generated content that imitates authority figures or disseminates deepfakes or synthetic media

Contact Risks

Children may be subjected to harmful online interaction with other users, such as child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes, including:

- Grooming
- Coercion into sharing indecent images
- Cyberstalking or harassment
- Deceptive contact using AI-generated personas or avatars

Conduct Risks

Children may themselves engage in unsafe or harmful behaviour online, such as:-

- making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography),
- Bullying or harassment of others
- Sharing inappropriate or explicit material
- Engaging with echo chambers or extremist networks online
- Misusing generative AI tools to produce or share harmful content

Commerce Risks

Children may be exposed to commercial exploitation, including:

- Online scams and phishing
- In-app purchases and gambling-like mechanisms
- Manipulative advertising using personal data
- Generative AI-driven recommendations that push risky financial or health-related products

School's Approach

- 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.
- For home learning or remote lessons, we will ensure parents/carers understand what systems schools use to filter and monitor online use. We will ensure parents/ carers are aware of what their children are being asked to do online, including the sites they will asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

- 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 school 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. See staff code of conduct and section 16 of this policy for more details
- 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 school, use of the school'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 school's IT systems.
- 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 school community.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school'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.

Governing bodies and Trustees will be doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, governing bodies will ensure their school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

11.Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. The school will require parents to provide at least two emergency contacts for purposes such as this.

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 or carers of all the children involved.

12. Pupils with special educational needs and disabilities

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:

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

- Cognitive understanding and being able to understand the difference between fact and fiction in online content and then repeating the content/ behaviours in schools or colleges or the consequences of doing so

We offer extra pastoral support for these pupils. Full details of this support can be found on our website. We adapt support to meet the needs of our pupils, so please discuss provision with our school staff.

13. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or unexplainable and/ or persistent absences from education where there are known safeguarding risks
- The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, named on the front of this policy and on the school website, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

Kinship Care and the Role of the Virtual School Head

In line with Keeping Children Safe in Education (2025), Aquila schools recognise the growing importance of understanding and supporting children living in kinship care arrangements, including informal and formal placements with extended family or close family friends.

Kinship Care Placements

- Kinship care refers to situations where a child is being raised by relatives or friends who are not their birth parents, due to circumstances where the parents are unable to provide care.
- These children may or may not be formally looked after by the local authority.

- Pupils in kinship care may face similar vulnerabilities to those in care (e.g. trauma, instability, attachment difficulties), and are entitled to appropriate pastoral, emotional, and academic support within school.

School responsibilities include:

- Identifying children living in kinship care through admissions, safeguarding, or pastoral teams.
- Ensuring staff are aware that these pupils may require additional support even if they are not formally classed as 'Looked After'.
- Engaging with carers sensitively, ensuring they are included in school communication and planning.
- Where concerns arise, making referrals through safeguarding pathways as appropriate.

Virtual School Head (VSH) – Advisory Role

- Virtual School Heads, who are statutory officers within local authorities, have responsibility for promoting the educational outcomes of:
    - Looked After Children (LAC)
    - Previously Looked After Children (PLAC)
    - Pupils with a social worker
    - Pupils in kinship care arrangements (non-statutory role)

Schools must:

- Collaborate with the relevant VSH to access advice and guidance on improving outcomes for these groups.
- Consider the VSH's input when planning support, intervention, or additional provision, particularly for pupils who may fall outside statutory care definitions but experience similar challenges.
- Share appropriate information with the VSH to inform their strategic role and advocacy for vulnerable learners.

15.LGBTQ

We will ensure that staff have the skills, knowledge and understanding to keep LGBTQ and gender questioning pupils safe. In particular we recognize that LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.*See appendix 6.

Keeping Children Safe in Education (KCSIE) 2025 indicates that updated statutory guidance on RSHE and support for gender-questioning pupils will be published and formally linked in the final September 2025 release.

Aquila recognises that this forthcoming guidance may impact areas of curriculum delivery, safeguarding practice, and staff responsibilities.
Once the final guidance is published:

- This policy and related documents (e.g., RSHE Policy, Safeguarding Policy, SEND Policy, Equality and Diversity Policy) will be reviewed and updated accordingly.
- Staff will receive appropriate training to ensure compliance with the updated expectations.
- Parents and carers will be informed of any significant changes to how the school delivers RSHE or supports pupils exploring their gender identity.

In the interim, the school continues to follow DfE RSHE guidance (2020), existing KCSIE safeguarding principles, and best practice in supporting all pupils with respect, care, and professional judgement.

16.Mobile phones and cameras

Staff must not use personal mobile phones or cameras to take pictures of pupils.

Staff should have their phones on silent or switched off and out of sight (e.g. in a drawer or cupboard) during class time. Smart watches can be worn during school day but the camera, messaging and call services must be disabled.

Mobile phones should not be used in a space where children are present (eg. classroom, playground).

Use of phones (including receiving/sending texts and emails on smart watches and mobile phones) should be limited to noncontact time when no children are present e.g. in office areas, staff room, empty classrooms.

It is also advised that staff security protect access to functions of their phone/smart watch.

Should there be exceptional circumstances (e.g. acutely sick relative), then staff should make the Head teacher aware of this and arrangements will be made with the school office so that the emergency call can be received.

The only exception will be staff using a mobile device to manage a known medical condition, where tracking requires access to a specific app. In this case, due to the potential safeguarding risks to pupils, the school and staff member must have explored and rejected all alternatives and the school leadership must be satisfied that cameras, other apps and access to messaging are restricted in line with the paragraphs above. We will follow the General Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

We recognise that many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school could sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. We therefore insist that phones are handed to the school for safe keeping when the child arrives on site and is collected when they leave.

The only exception will be pupils using a mobile device to manage a known medical condition, where tracking requires access to a specific app. In this case, due to the potential safeguarding risks to pupils, the school and staff member must have explored and rejected all alternatives and the school leadership must be satisfied that cameras, other apps and access to messaging are restricted in line with the mobile risk assessment

17. The Use of School Premises by Other Organisations

- Where services or activities are provided separately by another body using the school premises, the Head Teacher and LGB will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.
- If this assurance is not achieved, then an application to use premises will be refused.

18.Security

- All members of staff must sign in and out of the school premises. All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may become known. We operate within a whole-school community ethos and welcome comments from pupils/students, parents and others about areas that may need improvement as well as what we are doing well.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site. In severe situations, or where violent or unacceptable behaviour is repeated, the police will be contacted.

19.Complaints and concerns about school safeguarding practices

19.1 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).

19.2 Other complaints

Other complaints will follow either our complaints policy or whistleblowing policy. Both are available on the website.

19.3 Whistle-blowing

All members of staff are made aware of the trust's Whistle-blowing procedure and that it is a disciplinary offence **not** to report concerns about the conduct of a colleague that could place a child at risk. See the whistleblowing policy in the Staff Handbook. Members of Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk

20.Record-keeping (Bromcom)

Staff will record any and all welfare concerns about a child on the trusts Bromcom online safeguarding system immediately. In all instances, the recording of instances within this system must be in the child's words.

Incidents will be recorded securely and as follows:

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

All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in the Bromcom online safeguarding recording system. If members of staff are in any doubt about recording requirements, they should discuss their concerns with DSL.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely. Safeguarding records are shared with staff on a 'need to know' basis only.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.

Detailed guidance on Record Keeping is found in a separate document "Guidelines for Safeguarding Record Keeping in Schools".

All Staff WILL familiarise themselves with the responsibilities as outlined in this document.

www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-policies-and-guidance

The Head Teacher will be kept informed of all significant issues and concerns raised by the DSL.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

21.Training

21.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, which amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk and prevent people from becoming terrorists or supporting terrorism and to challenge extremist ideas.

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

Volunteers will receive appropriate training, if applicable.

21.2 The DSL and [deputy/deputies]

The DSL and deputy DSLs 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.

21.3 Governors and Trustees

All governors and Trustees must receive or undertake training about safeguarding annually, and as part of induction, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding.

Governors and Trustees must also read the most up to date DFE guidelines, including Keeping Children Safe in Education and sign to say they have done so.

21.4 Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

Aquila is committed to safeguarding children and promoting the welfare of children and expects all governors, staff and volunteers to share this commitment. All successful candidates will be subject to an Enhanced Criminal Record Disclosure from the Disclosure and Barring Service along with other relevant employment checks, including overseas criminal background checks where applicable. All new governors,

including Trustees, employees and volunteers will be required to undertake safeguarding training on induction that will be regularly updated in line with statutory guidance.

See appendix 2 of this policy for more information about our safer recruitment procedures and the Safer Recruitment policy in the staff handbook.

21.5 Safe Touch

Physical touch is an essential part of human relationships and within the school there may be times when it is appropriate to have physical contact with the children that you are caring for. However, it is crucial that in all circumstances, staff only touch children in ways that are appropriate to their professional or agreed role and responsibilities. Touch can be used to facilitate relaxation, for comforting or enable the child or young person to enjoy a positive emotional experience when in the sensory setting.

Consideration should be given to their age (both chronological and stage of development), gender and diversity, such as ethnicity, race, culture, religion, disability, sexual orientation and background.

Other factors that have influence include the power of relationships between adults and children, along with role status, therefore particular attention should be paid to any issues of sexual, physical or emotional abusive past experiences/history as the background of the child will influence any decision about who represents a "safe" adult in their eyes:

- Children who have been subject to physical or sexual abuse may be suspicious or fearful of touch. This is not to say that children who have experienced abuse should not be touched, it may be beneficial for the child to know different, safer and more reliable adults who will not use touch as a form of abuse;
- Staff should have regard for these issues throughout the child's education and be aware of any reactions to touch and modify their behaviour accordingly;
- Children from ethnic minority backgrounds may be used to different types of touch as part of their culture.

In schools, hugs should be offered only in sideways manner, sitting alongside a child to offer emotional support is more appropriate than allowing a child to sit on the lap of a member of staff. A fleeting or clumsy touch may confuse a child/young person or may feel uncomfortable or even cause distress. A child may initiate a hug; staff should gently move the child to the side and control the length of time of the hug to ensure it is the shortest time appropriate to the situation. For further information, please see Appendix 5.

22.Monitoring arrangements

This policy will be reviewed **annually** by the Trust. At every review, it will be approved by the Trust Board and each local governing board.

23.Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff Handbook for Code of Conduct and Whistleblowing policy
- Low level concerns policy in the staff handbook
- Complaints
- Health and safety
- Attendance
- Online safety
- Sex and relationship education

- SEN and Inclusion Policy
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Lettings Policy

24.Local Support

- All members of staff in Aquila schools are made aware of local support available
    - **Contact details for Area Safeguarding Adviser (Education Safeguarding Team)**
        - www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts

It is recommended that schools include up-to-date and specific contact details for the Area Safeguarding Adviser and admin staff.

    - **Contact details for Online Safety in the Education Safeguarding Team**
        - 03000 415797
        - esafetyofficer@kent.gov.uk (non-urgent issues only)

    - **Contact details for the LADO**
        - Telephone: 03000 410888
        - Email: kentchildrenslado@kent.gov.uk

    - **Children's Specialist Services**
        - Central Duty Team: 03000 411111
        - Out of Hours Number: 03000 419191

    - **Early Help and Preventative Services**

      Front Door - 03000 41 11 11, Out of hours 03000 41 91 91
      Ashford - 03000 41 03 05 - AshfordEarlyHelp@kent.gov.uk
      Canterbury - 03000 41 62 22 - CanterburyEarlyHelp@kent.gov.uk
      Dover - 03000 42 29 98 - DoverEarlyHelp@kent.gov.uk
      Folkestone and Hythe - 03000 41 10 08 - ShepwayEarlyHelp@kent.gov.uk
      Maidstone - 03000 42 23 40 - MaidstoneEarlyHelp@kent.gov.uk
      Swale - 03000 42 11 62 - EarlyHelpSwale@kent.gov.uk

    - **Kent Police**
        - 101 (or 999 if there is an immediate risk of harm)

    - **Kent Safeguarding Children Board (KSCB)**
        - kscmp@kent.gov.uk
        - 03000 421126

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.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. If you have a concern you must contact Chris Clarke to arrange a diagnosis or advise parents to seek a diagnosis through an appropriately trained medical practitioner.

- School staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can affect their mental health, behaviour, and education. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the designated safeguarding lead or a deputy.

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 sometimes referred to as Psychological abuse is the persistent emotional maltreatment of a child such as causing severe and adverse effects on the child's emotional development and mental health. Some level 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 are 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.

Sexual abuse can take place online and technology can be used to facilitate off line abuse.

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

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

25. Appendix 2 – Safeguarding & Child Protection Recording

Introduction

The Independent Inquiry into Child Sexual Abuse (IICSA) found that proper creation, maintenance and long-term retention of records is an important part of supporting victims of Child Sexual Abuse (CSA) and bringing perpetrators to justice. This is because victims and survivors may take decades to come to terms with what has happened to them and potentially to decide to take action to report a crime.

The IICSA Inquiry recommended that records relating to CSA should be retained for 75 years. It also recommended that the UK government directs the Information Commissioner's Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. The Inquiry report stated that such a code should set out that institutions should have:

- retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;
- clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
- policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

A Code of Practice has not yet been published, but every Aquila school is committed to ensuring practices at the school are reflective of IICSA recommendations.

Statement of Intent

Aquila is aware that creation, maintenance and retention of child protection, safeguarding and CSA records must be carried out with the understanding that access to records may be required many decades after records are created.

This document should be read in conjunction with the school's / Trust's Record Retention Policy.

How to record safeguarding/child protection concerns.

Given these very long retention periods, Aquila Schools will ensure that safeguarding, child protection and CSA records are written in such a way as to be intelligible in the future and without any additional knowledge of the school, its staff, pupils or systems. Staff will be trained in good practice.

Our records will:

- Be written by the school's Designated Safeguarding Lead (DSL), Deputy (DDSL) or other suitably trained staff
- Identify the author by name and role
- Make clear it where the person who is recording the information is not the person who has seen or heard the issue, and identify all relevant parties by name and role
- Use full names of staff, other adults and parents/family members (full name in this context means first and surname)
- Ensure staff roles / job titles are included
- Ensure family relationships are clear
- Use full name of child whose record this is
- Use full name of any other child involved and ensure a mirror record is on their file, if appropriate
- Not use initials when recording names
- Where individuals have the same or similar names, ensure there is a distinguishing factor, eg middle name, job title, DoB etc
- Ensure all spelling, punctuation and grammar is correct.
- Use appropriate language to describe events, not slang, shorthand, local terminology or asterixis.
- Ensure quotes are properly identified as such and attributed to their owner
- Be objective and avoid opinion. If opinion is necessary, ensure it is identified as such and attributed to its owner.

How records are stored

Aquila Schools use Bromcom Safeguarding to record and store child protection and safeguarding records.

This method was risk assessed in conjunction with our Data Protection Officer using a Data Protection Impact Assessment to determine the nature, scope and context of the data processing. This is subject to regular review.

We inform our pupils, families and staff that we process their personal data for this purpose via our Privacy Notices which are published on the school website.

Any related physical first hand notes / recordings will be also be securely retained.

The transfer of pupil safeguarding records

Keeping Children Safe in Education 2023 states that "where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file."

When a child leaves an Aquila school, all pupil records, including safeguarding, child protection and CSA records will be transferred in a secure manner, to the child's new school. The legal basis and time scale for this can be found in The Education (Pupil Information) (England) Regulations 2005, parental consent is not required.

All copies of data held by the school that the child has departed will then be deleted or retained in line with the retention policy, including all paper records and data stored electronically. A record will be kept for tracking and auditing purposes only.

Schools may retain some minimal 'skeleton' data about pupils' admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the school's historical archive. Where we intend to create and maintain these records, this will be noted on the retention policy. In some instances, we may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If we do retain pupil records, we will justify this retention and document the reasons for doing so, and will carry out a Data Protection Impact Assessment where required.

Responsibility for maintaining the pupil record, including retaining records relating to Child Protection, Safeguarding and CSA passes to the 'last known school'.

The school is the final or last known school if:

- secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;
- at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

Tertiary colleges are not included in this definition, therefore the school will retain the record. However, the college must receive a copy of the child protection file, as per the requirements of KCSiE above.

Retention of Records relating to Staff

Aquila schools retain staff records in line with the school Record Retention Policy. Where staff records pertain to CSA they will be retained for up to 75 years, subject to review, as set out in the Policy.

As stated above regarding the long-term retention of minimal pupil records, we may wish to retain very basic 'skeleton' records about staff that have worked in the school/trust beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates and evidence of Single Central Record checks. This may be useful when we need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of our historical archive. If we intend to create and maintain these records, this will be noted on the retention policy.

Appendix 3: safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity).

Shortlisting

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

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

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history.
    - Whether they are included on the barred list.
    - Whether they are prohibited from teaching.
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales.
    - Any relevant overseas information.
    - Sign the application form confirming the information they have provided is true.

Online search.

We will run an online search in line with our Safer Recruitment policy

Seeking references and checking employment history

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

When seeking references we will:

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

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made.
- Ask candidates to sign a copy of their application form as a true and accurate record of their history.

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and the recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

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

Regulated activity means a person who will be:

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

Existing staff

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

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

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

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

Agency and third-party staff

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

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors if they are engaged in regulated activity or their work provides them with an opportunity for regular contact with children

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

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

Trainee/student teachers

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

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

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

Volunteers

We will:

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

Governance.

All trustees, local governors and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the Trust Board will have their DBS check countersigned by the Secretary of State.

All trustees, local governors and members will also have the following checks:

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

All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

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

Where pupils are placed in alternative provision settings, either full- or part-time, the school retains safeguarding responsibility for those pupils.

Before any placement begins, the school must obtain written confirmation from the provider that they have carried out all required safer recruitment checks on their staff in accordance with KCSIE (2025). This includes:

- Enhanced DBS checks on all staff who may have contact with children
- Barred list checks where relevant
- Prohibition and disqualification checks (where applicable)
- Confirmation that volunteers are appropriately supervised if not in regulated activity

The designated safeguarding lead (DSL) will:

- Evaluate the safeguarding arrangements of the AP setting prior to placement
- Establish and maintain a clear line of communication with the AP's DSL or equivalent
- Monitor the ongoing welfare, attendance, and engagement of pupils in AP
- Conduct a risk assessment where there are any safeguarding concerns

Any failure to obtain written assurances or observe proper safeguarding practices will result in the placement being delayed or terminated.

Appendix 4: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

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 school

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 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. We will take advice from LADO and Worknest with LADO advice taking precedence. LADO advice should be confirmed in writing via email.

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust.
- If in doubt, the case manager will seek views from the WORKNEST and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

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

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff can seek advice and support from a trade union representative or appropriate colleague. Counselling is available through Staff Care Services.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, 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 LGB will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will take WORKNEST and LADO advice on whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

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

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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 that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

When an adult makes an allegation to the school 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

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or another adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns promptly to safeguard the welfare of children.

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 9.6 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's code of conduct and taking advice from Worknest.

Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concerns policy: A guide for organisations which work with children

Record keeping

All low-level concerns will be recorded in a spreadsheet stored securely by the Headteacher. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

If the concern reaches a threshold to require LADO advice, staff recording in Bromcom will note the reference number that you are given when you get confirmation as proof of recording. The concern then goes to the DSL and you can follow up if you wish by quoting the reference.

If there is an urgent concern, the DSL gets an urgent concern notification by e mail with a big red exclamation mark and bold letters to show the urgency.

Records will be:

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

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

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance. Take advice from WORKNEST if you are not sure whether to include a concern in a reference.

Appendix 5: specific safeguarding issues

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 school
- 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, neglect and exploitation, 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 school without a new school being named, and 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. It may involve 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
- Have been the perpetrator or alleged perpetrator of serious violence (e.g .knife crime)
- Been the victim of serious violence or knife crime
- 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 getting home late
- Regularly missing from home or school and found outside their immediate locality
- 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.

Children being criminally exploited may be at higher risk of 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. It may involve 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.

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.

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.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. Children can be victims of domestic abuse by seeing or hearing it or experiencing the effects within their own intimate relationships.

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 school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

Homelessness

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

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

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' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) 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 HBA 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 HBA 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 9.3 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 school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - 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 school
    - 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.

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 fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for or use of terrorist violence.
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent people from becoming terrorists or supporting terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school becoming terrorists or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 9.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including behaviour policy, online/e-safety policy.

Child on Child abuse

Child on child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online. Even if there are no reported cases in school, staff must remain vigilant and never dismiss concerns as "just banter" or "part of growing up".

Child on child 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 children

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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.

When staff have any concerns about child on child abuse, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, section 9.8 and 9.9 set out more detail about our school's approach to this type of abuse.

We recognise that it is more likely that girls will be victims and boys' perpetrators, but that all child on child abuse is unacceptable and will be taken seriously.

Sexual violence and sexual harassment between children in schools

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 school.

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) and gender questioning children are at greater risk.

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school'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 school
- 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 school
- 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 on Bromcom and alert the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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 school who are visiting for a professional purpose, such Ofsted Inspectors will be asked to show photo ID. Trust employees such as educational psychologists and school improvement partners have been checked before deployment and will be wearing the Aquila lanyard.

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

Contact parents, carers and emergency contacts using details stored in Bromcom.

The child / children will remain with the senior leader on site or in the school wrap around care provision

If we get no reply from any contacts or the child is still not collected by the end of the wrap around care provision, we will contact social services.

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:

Contact parents, carers and emergency contacts using the details stored in Bromcom until we are able to speak to someone. If we are not able to inform these contacts quickly and we are sure the pupil has left the school site we will inform the police.

Appendix 6: Keeping yourself safe when responding to disclosures (the 6 R's – what to do if…)

1. Receive

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously
- Note down what has been said

2. Respond

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. "It will be alright now"
- **Do not promise confidentiality;** you have a duty to refer
- Reassure and alleviate guilt, if the pupil refers to it e.g. "you're not to blame"
- Reassure the child that information will only be shared with those who need to know

3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; "Did he/she….?" Such questions can invalidate evidence.
- **Do** ask open "TED" questions; Tell, explain, describe
- Do not criticise the perpetrator; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions

5. Remember

- Contact the Designated Safeguarding Lead (DSL)
- The DSL may be required to make appropriate records available to other agencies
- Kent Safeguarding Children Multi-agency Partnership KSCMP: https://www.kscmp.org.uk/

6. Relax

- Get some support for yourself, dealing with disclosures can be traumatic for professionals

Appendix 7: National Support Organisations

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Safeguarding Network: https://safeguarding.network/keeping-children-safe-education/#summary

Support for Pupils

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Respect Men's Advice Line: www.mensadviceline.org.uk

Honour based Violence

- Forced Marriage Unit: https://www.gov.uk/guidance/forced-marriage

Sexual Abuse and CSE

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk

- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org
- Keeping Children Safe in Education p132 https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Appendix 8: Safe Touch Key Principles and Guidance for Good Practice

It is important to remember that children may have suffered from inappropriate/unwanted and detrimental abuse and/or neglect which may lead them to attempt to relate to others in inappropriate ways. Any unwanted physical contact by an adult, however well intended, may trigger unexpected reactions which can be misconstrued in certain children. All staff should be aware that physical contact may lead to a response which is difficult to understand and manage.
Where a child or young person initiates inappropriate contact, it is the responsibility of the staff member to ensure that contact is not exploited in any way and to sensitively deter the child without them feeling rejected, and help them to understand the importance of personal boundaries. The incident should be reported to the DSL via Bromcom in order for careful consideration, advice and support to be given to the situation.

For each child/young person what constitutes an intimate part of the body will vary, but generally speaking it is acceptable to touch children's hands, arms and shoulders:

- Other parts of the body are less acceptable to be touched by degrees and some parts of the body are "no go areas";
- Therefore, it may be appropriate to touch a child's knee or to stroke their hair - if the child indicates such touch is appropriate. To go beyond this would be unacceptable, even if the child appeared to accept it;
- In any case, no part of the body should be touched if it were likely to generate sexualised feeling on the part of the adult or child;
- It is never acceptable to touch a child under their clothing except to provide first aid or for personal hygiene if a parent is not available. In these circumstances another adult must be present at all times.
- Also no part of the body should be touched in a way that appears patronising or intrusive;
- Therefore, the context in which touch takes place is usually the decisive factor in determining the emotional and physical safety for both parties;
- Physical contact should never be secretive or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that their action could be misinterpreted, or if any action is observed by another as being inappropriate or possibly abusive, the incident and circumstances must be reported immediately via Bromcom or a senior manager as outlined in the procedures for handling allegations and an appropriate record made. Parents/carers and Ofsted should be informed;
- What message is being sent out to the child? If the intention is to positively and safely communicate affection, warmth, acceptance and reassurance it is likely to be acceptable.

Staff should touch with confidence and should verbalise their affection, reassurance and acceptance by touching and making positive comments, for example touching a child's arm and saying "well done". Where children/young people indicate that touch is unwelcome staff should back off and apologise if necessary. Staff should talk to colleagues and record their interactions with children. If particular strategies work, or not, colleagues should be informed so they can build on or avoid making the same mistake.

The key is for staff to help children and young people experience and benefit from touch, positively and safely, as a way of communicating affection, warmth, acceptance and reassurance.
Staff should:

- Be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described;
- Always be prepared to report and explain actions and accept that all physical contact be open to scrutiny;
- Be aware of cultural or religious views about touching and always be sensitive to issues of gender;
- Understand that physical contact in some circumstances can be easily misinterpreted;
- Ensure that their touch is non-abusive, with no intention to cause pain or injury, that it is in the best interest of the child and others;

Staff must not:

- Touch a child in a way that may be considered indecent, for example, do not touch within the clothing or on/in any erogenous zones, e.g. on the neck/lips, middle of the back;

- Indulge in play fighting or horse play.

Appendix 9: The use of Reasonable Force Touch

The use of 'reasonable force' in schools and colleges. There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The DFE believes that the adoption of a 'no contact' policy at a school or college can leave staff unable to fully support and protect their pupils and students. It encourages headteachers, principals, governing bodies, and proprietors to adopt sensible policies, which allow and support their staff to make appropriate physical contact. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances. When using Team Teach principles, staff must have up to date training.

When using reasonable force in response to risks presented by incidents involving children with special educational needs or disabilities (SEND), mental health or with medical conditions, schools and colleges should in considering the risks carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, schools and colleges can reduce the occurrence of challenging behaviour and the need to use reasonable force.

Appendix 10: Human Rights and Equalities Duties.

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations, including schools, to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention. The specific convention rights applying to schools are:

• Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)

• Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity

• Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination

• Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

Equality Act 2010. Schools and colleges have obligations under the Equality Act 2010. According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and trustees must carefully consider how they are supporting their pupils with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK (www.gov.uk). For further information Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com).

Public Sector Equality Duty. The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges. The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is why good record-keeping and monitoring of all forms of abuse and harassment is essential.