

Author	Judith Astwood	Target group	All employees, consultants and volunteers
Issued	September 2019		
Approved by	Board of Trustees	Next review	September 2020

## Introduction

**This is a statutory policy that all Anthem schools must make available on their website.**

Schools should ensure that the policy is compliant with the school's Local Authority/Local Safeguarding Children Board (LA/LSCB) child protection procedures. Additional Local Authority procedures, or policies, should either be embedded within the policy or added as appendices to the Anthem suite of Child Protection and Safeguarding Policies.

This policy will be reviewed annually.

**The Child Protection and Safeguarding Policy *must contain:***

- The name of the policy – Child Protection and Safeguarding.
- Recognition of statutory responsibility.
- An outline of the safeguarding principles to which the school adheres.
- The name and responsibilities of the Designated Safeguarding Lead & Deputy.
- Outline where written arrangements for covering the Designated Safeguarding Lead and Looked After Child designated teacher (DLAC) when they are unavailable or off site.
- The name and responsibilities of the Looked After Child designated teacher (DLAC).
- The name of the Education Director.
- The procedures for reporting and responding to a child protection/safeguarding concern.
- Reference to the Safer Recruitment Policy and other related policies such as: Anti-bullying, PSHE, Tackling Extremism and Anti-Radicalisation (PREVENT) and e-Safety Policies, and the Staff Code of Conduct.
- A confidentiality statement.
- An outline of practice with regard to staff (and visitors to school) working with pupils.
- Arrangements for monitoring and evaluation of the policy.
- Signatures, date and date of next review.

Some text in the following policy is adaptable at the discretion of the school to fit the local context.

This will be monitored at audit to ensure that all local details, local contextual issues and procedures are in place, according to KCSIE 2019.

## Child Protection and Safeguarding Policy

Anthem Schools Trust and Abbey Woods Academy fully recognises its statutory responsibilities for Child Protection and Safeguarding. It is committed to promoting the welfare of children and young people and expect all staff and volunteers to share this commitment and be appropriately trained.

### School Designated Safeguarding Lead (DSL)

The school has appointed a Designated Safeguarding Lead (DSL) from the senior leadership team in accordance with KCSIE 2019 guidance.

**The DSL is responsible for matters relating to child protection and welfare in this school:**

**Mrs Rowena Stott – Head of School – [deputy@abbeywoodsacademy.oxon.sch.uk](mailto:deputy@abbeywoodsacademy.oxon.sch.uk)**

**In their absence, these matters will be dealt with by the Deputy DSL:**

**Miss Julie Hobbs – Home School Link Worker –  
[jhobbs@abbeywoodsacademy.oxon.sch.uk](mailto:jhobbs@abbeywoodsacademy.oxon.sch.uk)**

The DSL is key to ensuring that proper child protection and safeguarding procedures and policies are in place and adhered to. They will also act as a dedicated resource available for other staff, volunteers and Local Governors to draw upon. Parents are welcome to approach the DSL if they have any concerns about the welfare of any child in the school, whether these concerns relate to their child or any other. The DSL will liaise with the Local Authority and work with other agencies in line with statutory guidance *Working Together to Safeguard Children*, 2018 and *Keeping Children Safe in Education*, Sept 2019.

There will always be cover for this role and arrangements for this are as follows:

Staff are made aware of all procedures during training at the start of the academic year and through regular training throughout the year. The daily calendar records absence of DSL

### LA Child Protection and Safeguarding

LA children's social care: 01865 323041

LA designated officer(s): 01865 323041

LA Channel Panel: 03450507666

### Looked-After Children

**The Designated Teacher for Looked-After Children (DLAC) is:**

**Rowena Stott – Head of School – [deputy@abbeywoodsacademy.oxon.sch.uk](mailto:deputy@abbeywoodsacademy.oxon.sch.uk)**

The DLAC has received appropriate training and will make an annual report to the Local Governing Body and the Trustees in accordance with the latest statutory guidance. The Local Governing Body will consider the information in the report under the scheme of delegation. The Trustees will take any appropriate action.

The DLAC will liaise with the Virtual Head for Looked-After Children to ensure that the funding assigned to the child/young person is put to best use. The role will also encompass the needs of post-

LAC students. The arrangements for covering this role should the DLAC be absent or unavailable are as follows:

Julie Hobbs – DSL – [jhobbs@abbeywoodsacademy.oxon.sch.uk](mailto:jhobbs@abbeywoodsacademy.oxon.sch.uk)

## Legislation and statutory guidance

This policy is based on the Department for Education’s statutory guidance, [Keeping Children Safe in Education 2019](#), [Working Together to Safeguard Children 2018](#), and the [Governance Handbook](#). 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:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children.
- Statutory [guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The [Childcare \(Disqualification\) Regulations 2009](#) and [Childcare Act 2006](#), which set out who is disqualified from working with children in their own right (but not by association, as of 31 August 2018).

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#), and on the advice document [Sexual violence and sexual harassment between children](#) (May 2018).

## Scope and publication

**This policy applies to all staff, Trustees, Local Governing Body members, central team staff and volunteers working in each school and applies wherever staff or volunteers are working with pupils even where this is away from the school, for example at an activity centre or on an educational visit. This policy is published on the school’s website and can also be made available in large print or another accessible format if required.**

The Trustees and Local Governing Body Members take seriously their responsibility under Section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with

other agencies to ensure adequate arrangements within our schools to identify, assess, and support those children who are suffering harm.

The DfE defines safeguarding and promoting the welfare of children as:

- protecting children from maltreatment
- preventing impairment of children’s health or development
- ensuring children are growing 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 a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect **specific** children who are suffering, or are likely to suffer, significant harm.

Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

## Principles

The school has a statutory duty to promote and safeguard the welfare of children and have due regard to guidance issued by the Department for Education<sup>1</sup>. This school recognises its legal and moral duty to promote the wellbeing of children, protect them from maltreatment, and respond to child abuse, as well as its responsibility to follow the local inter-agency procedures of [\[Name of Local Authority\]](#) Safeguarding Multi-agency Partnership (MAP). The Multi-agency partnership consists of three member groups – the Police, the Clinical Commissioning Group and the Local Authority Social Care. These have been established from September 2019.

We believe that every child, regardless of age, has at all times and in all situations a right to feel safe and protected from any situation or practice which results in a child being physically or psychologically damaged. We believe that children must receive the right help at the right time to address risks and prevent issues escalating.

We believe that children have the right to have their views heard and considered by all professionals when making decisions to keep the child safe from harm. We will actively enable and encourage children to participate in an open dialogue with all school stakeholders about safeguarding matters and include them in decisions about safeguarding practices, developing an inclusive and open ethos to keeping them safe.

We agree that we have a primary responsibility for the care, welfare and safety of the pupils in our charge, and we will carry out this duty through our teaching and learning, extra-curricular activities, pastoral care and extended school activities. We will teach about safeguarding, including keeping safe online, as part of providing a broad and balanced curriculum covering relevant issues through personal, social health and economic education.

We always maintain an attitude of ‘it could happen here’. When we have concerns about the welfare of a child, staff will always act in the interest of the child and will raise these with the school’s Designated

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<sup>1</sup> Keeping Children Safe in Education, Sept 2019 & Working Together to Safeguard Children, 2018

Safeguarding Lead. In exceptional circumstances, such as in an emergency or a when a genuine concern has not been appropriately acted upon, staff members will speak directly to children's social care.

The school seeks to adopt an open and accepting attitude towards children as part of their responsibility for pastoral care. The school hopes that parents and children will feel free to talk about any concerns and will see school as a safe place if there are any difficulties at home.

We recognise that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal, to aggressive or withdrawn.

Every complaint or suspicion of abuse from within or outside the school will be taken seriously and in all proper circumstances will be referred to an external agency such as children's social care services, the LA designated officer(s), police or the NSPCC, without investigation by the school.

The LA children's social care services, LA designated officer(s) and NSPCC contact details will be displayed throughout the school for ease of reference for the school community and children.

The name of the school's Designated Safeguarding Lead and their deputy will be clearly advertised throughout the school, with a statement explaining the school's role in referral and monitoring.

The name of the Education Director will be clearly displayed in the school office for school staff.

## **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 or disabilities
- are young carers
- are looked-after or post-looked-after
- 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.

## **Roles and responsibilities**

### **School staff (including central team, volunteers, students, Trustees and Local Governing Body members)**

All staff will safeguard children's wellbeing and promote their welfare: protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow

up in circumstances consistent with the provision of safe and effective care; and by taking appropriate action to enable all children to have the best outcomes.

All staff will read Part 1 and Annex A of the Department for Education’s statutory safeguarding guidance, *Keeping Children Safe in Education 2019*, and review this guidance at least annually. It is a recommendation from the Trust that all staff also read Part 5.

Trustees, Education Directors, Regional Safeguarding Leads, members of the School Leadership Teams, Designated Safeguarding Leads and their deputies, and members of the Central Team should read the document in its entirety.

All staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education.
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation.
- All new staff and volunteers will receive basic safeguarding training as part of their induction and be expected to read and understand the Child Protection and Safeguarding Policy.

The section on training and the appendix of this policy outline in more detail how staff are supported to do this.

## Main responsibilities of the DSL

### Managing referrals

- Refer all cases of suspected child abuse to children’s social care services.
- Refer all safeguarding concerns involving adults (staff & volunteers) to the LA designated officer(s).
- Refer an individual to the Disclosure and Barring Service (when a staff member has harmed or poses a risk of harm, to a vulnerable adult or child, or has been dismissed for harming a vulnerable adult or child or would have been dismissed had they not left employment). **This is a legal duty and the school will work with the Regional Safeguarding Leads and Education Directors in completing and making the referral.**
- Refer to the Teaching Regulation Agency (TRA) (formerly NCTLs Teacher Services or Employer Access Online Service) when checking the Teacher’s Prohibition List for all teachers employed by the school and for making referrals for teacher misconduct<sup>2</sup>. Teaching Regulation Agency (TRA) checks will be completed on all staff involved in teaching.

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<sup>2</sup> <https://www.gov.uk/government/collections/teacher-misconduct>

- Inform the Police (cases where a crime may have been committed).
- Liaise with the Headteacher to inform him/her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

## Training

Receive appropriate training every two years (or more regularly) and ensure that updates are accessed on an annual basis through the Local Authority or OSCB.

They should:

- Understand and participate in the assessment process for providing early help and intervention through the MAP.
- Understand and participate in child protection conferences and reviews, including providing reports.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding policy and procedures, especially new, agency/supply and part-time staff.
- Be alert to and support the specific needs of children in need, those with educational needs, looked after children and young carers.
- Attend relevant and refresher training courses, including online safety.
- Organise child protection induction, and update training annually for all school staff.
- Encourage a culture among all staff of listening to children and taking account of their wishes and feelings, and any measures the school may put in place to protect them.
- Ensure that at least one interview panel member of each interview has undertaken Safer Recruitment training.

## Raising awareness

- Ensure the school's policies are known and used appropriately.
- Ensure the school's Child Protection and Safeguarding policy is reviewed annually and the child protection procedures are in line with the LA, MAP, working with the Local Governing Bodies and Trust to achieve this.
- Ensure the Child Protection and Safeguarding Policy and procedures are available publicly, and parents are aware that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the local MAP to make sure staff are aware of training opportunities and the best local policies on Child Protection and Safeguarding.
- Keep written records of concerns about a child even if there is no need to make an immediate referral.
- Maintain detailed, accurate, secure written records of concerns and referrals and ensure actions are recorded and acted upon.
- Ensure that all child protection records are kept confidentially and separately from pupil records, until the child's 25<sup>th</sup> birthday, and are passed on to the child's next school in a confidential and secure manner, ensuring a confirmation receipt is obtained on delivery.
- Ensure that the existence of the child protection file is marked on the pupil records.

- Ensure that any pupil with a child protection plan who is absent from the educational setting without explanation is referred to children's social care<sup>3</sup> immediately.
- Ensure the school follows up any unexplained absences immediately and refer this to the appropriate agency (educational welfare service, social care or the police) if the child cannot be located. Ensure that the school follows local Child Missing in Education procedures.
- Encourage a culture of listening to children and taking account of their wishes and feelings, in any measures the school may put in place to protect them.
- Provide, with the Head teacher, a termly report for the Local Governing Body.
- Provide the Trust with termly safeguarding reports.

The DSL and their deputy must undertake child protection training and training in inter-agency working every two years (or more regularly) and will attend annual refreshers provided by the LA/MAP to remain updated on policy, procedures and developing concerns nationally and regionally.

Their full responsibilities are outlined in the job descriptions of both the DSL and the Deputy DSL.

## The Headteacher

- The Headteacher is responsible for the implementation of this policy, including:
- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction.
- 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.
- 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.
- Ensuring the school has at least two emergency contact details for each pupil/student.

## Reporting and recording

It is the responsibility of all adults in school to ensure that any safeguarding concerns they may have, are reported to the Designated Safeguarding lead in school.

This school requires all staff to record non-urgent concerns on CPOMS as soon as possible, within the same day.

Any urgent concerns, where a child might be at risk of significant or immediate harm must be reported immediately to the DSL (or in their absence the DDSL) and then reported in writing onto CPOMS as soon as possible within the same day or as directed by the DSL on that occasion.

All reports will include complete details of the child, any others involved and of the incident. All names will be written in full and all people mentioned will be given their designation (i.e. "Fred, father of

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<sup>3</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/307867/Statutory\\_Guidance\\_-\\_Missing\\_from\\_care\\_\\_3\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care__3_.pdf)

John”). As much as possible the language used by the child/student in any disclosure, will be reported and not substituted by the adult reporting.

The report will be considered a formal document and so all details must be clear so that, if referenced at a later stage, the person reading it has a clear understanding of who is involved and what occurred. Reports may be submitted as part of legal proceedings.

Where a child/student has such a file, this will be indicated on their general pupil file.

Next steps for the concern will be followed up by the DSL and DDSL. (See referral procedures.)

## Confidentiality and information sharing

The school will ensure that all child protection records are kept confidential and only allow disclosure to those who need the information in order to safeguard and promote the welfare of children. The school will cooperate with police and children’s social services to ensure that all relevant information is shared for the purposes of child protection investigations.

Regardless of any duty of confidentiality, if any member of staff has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the designated safeguarding lead in accordance with this policy. All staff may raise concerns directly with children’s social care services.

## Recognising abuse and taking action

Staff, volunteers and Local Governing Body Members must follow the procedures set out below in the event of a safeguarding issue.

We choose to refer via the DSL in the majority of cases because they may have wider knowledge about the family/circumstances that is unknown to the rest of staff. This also ensures that the person responsible for Safeguarding and Child Protection has a comprehensive picture of what is happening in school.

Nevertheless, where a staff member has a concern and the DSL or DDSL cannot be located or where the staff member feels the response from the DSL/DDSL is inadequate, the staff member **MUST** refer the case into Social Care using the processes and procedures below.

### If a child is in immediate danger

Early identification of abuse and neglect is vital. Staff will always speak to the designated safeguarding lead to escalate their concerns. **In exceptional circumstances, such as in an emergency or if they believe that a genuine concern that they have has not be appropriately addressed, they will speak *directly* to children’s social care.**

Should the DSL or their deputy not be contactable **immediately**, 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 as soon as possible if you make a referral directly.

Record your concern on CPOMS immediately and inform the DSL, Deputy DSL or Miss Hobbs or go to the following website: <http://www.oscb.org.uk/reporting-concerns/>

## 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. Staff should not take a decision as to whether or not the abuse has taken place.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record and any evidence must be kept securely and handed to the DSL as soon as possible.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so.

1. Complete a paper Expression of Concern Form and hand directly to a DSL. This is then uploaded to CPOMS.

2. If no DSL is available contact <http://www.oscb.org.uk/reporting-concerns/>.

## **Do not investigate suspicions regarding child protection issues.**

## **Action by the Designated Safeguarding Lead – concerns about children**

The action to be taken by the DSL will take into account:

- The local inter-agency procedures of the Oxfordshire County Council Safeguarding Children Board.
- The nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to children's social care or the Police. In case of serious harm, the Police will be informed from the outset.
- The wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes.
- The wishes of the complainant's parents provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the designated safeguarding lead is concerned that disclosing information to parents would put a child at risk; s/he will take further advice from the relevant professionals before making a decision to disclose; and
- Duties of confidentiality, so far as applicable.

## Referral

If there is room for doubt as to whether a referral should be made, the DSL will consult with children's social care services on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, the DSL will make a referral without delay. If the initial referral is made by telephone, the DSL will confirm the referral in writing to children's social care services within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact children's social care services again. Should the school require further support in escalating the case then they will contact the Regional Safeguarding Leads.

## 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 2019* explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs'.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 4.

**Any teacher** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the Police, personally. This is a **statutory duty**, and teachers may face disciplinary sanctions for failing to meet it. (KCSIE September 2019 and Serious Crime Act 2015). Thereafter, they may discuss their concerns with the DSL.

The duty 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 other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

**Any member of staff** who suspects a pupil is *at risk* of FGM or discovers that a pupil age 18 or over appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures.

Report suspected cases directly to the police and then make a referral through

<http://www.oscb.org.uk/reporting-concerns/>

NSPCC advice line: 08000283550

## 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 concerns about a child's welfare and the child is not in immediate danger.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

## Early help

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

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.

## Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

The local authority will make a decision within one 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 contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

## If you have concerns about extremism

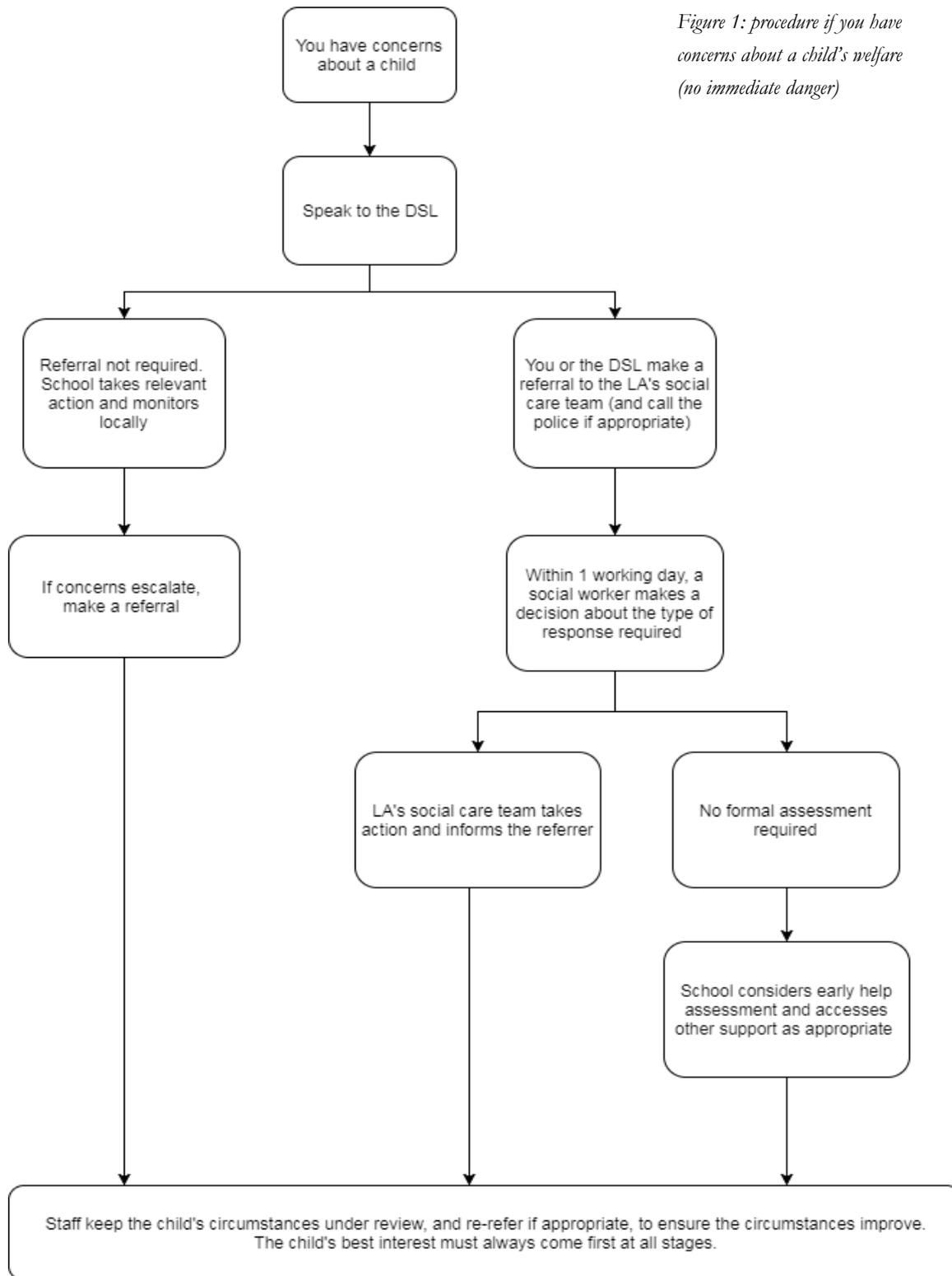
If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and Local Governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

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



## 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’ or ‘part of growing up’. Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

Further guidance is given in:

- KCSIE 2019: Part 5 and Sexual Violence
- Sexual Harassment Between Children in Schools and Colleges Paragraph 43 and Annex A

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

This is most likely to include, but may not be limited to:

- bullying and cyberbullying
- physical abuse which includes hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm
- sexual violence such as rape, assault by penetration and sexual assault
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be stand alone or part of a broader pattern of abuse
- upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause their victim humiliation, distress or alarm. This is a criminal offence thus there is a duty to report to the police.
- sexting
- initiation/hazing type violence and rituals.

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

- You must tell the DSL and record the allegation, but do not investigate it.
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

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

- challenging any form of derogatory or sexualised language or behaviour
- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- ensuring pupils know they can talk to staff confidentially by regular talks in PSHE and assembly.
- ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

Further support can be found in [\*UKCCIS Guidance: Sexting in schools & colleges\) responding to incidents and safeguarding young people.\*](#)

## Informing parents

**Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the LA designated officer(s), the Police and/or the Headteacher before discussing details with parents.**

## External agencies

Whether or not the school decides to refer a particular complaint to children's social care services or the police, the parents and pupil will be informed of their right to make their own complaint or referral to the children's social care services or the child protection unit of the Police and will be provided with contact names, addresses and telephone numbers, as appropriate.

## Specific safeguarding concerns

We will take into account the specific needs of children/young people in difficult circumstances and will ensure that their additional needs are taken into account and dealt with according to the local authority arrangements and KCSIE 2019.

- Such circumstances include:
- children and the court system
- children with family members in prison
- child criminal exploitation: county lines
- domestic abuse
- homelessness
- so-called 'honour-based' violence - encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- child sexual exploitation
- preventing radicalisation
- peer-on-peer abuse
- sexual violence and sexual harassment between children in schools.

## Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To this end, we will ensure there is extra pastoral support for children with SEN and disabilities.

## 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 and young people.

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 young person needs to be restrained to prevent violence or injury.

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

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, we will, in considering the risks, carefully recognise the additional vulnerability of these groups (under the Equality Act 2010) in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

Further detail is found in the **School Behaviour Policy**.

If we need to refer a pupil, we will contact the Mash team through:

<http://www.oscb.org.uk/reportingconcerns/>

## Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school.

All staff, but especially the Designated Safeguarding Lead (or deputy) will consider the context within which such incidents and/or behaviours occur. Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Details of the school's key contextual issues are shared with the Trust via the Strategic Safeguarding Group.

(Children's social care assessments should consider such factors, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.)

Further information can be found in **KCSIE 2019 Annex A** and [www.contextualsafeguarding.org.uk](http://www.contextualsafeguarding.org.uk)

## Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, speak to the Headteacher.

Where there are concerns about the Headteacher, this should be referred to the Education Director who **MUST** inform the Chief Executive Officer of the Trust immediately.

You can also discuss any concerns about any staff member or volunteer with the DSL.

The Headteacher/Education Director/DSL will then follow the procedures set out in the Trust Managing Allegations Against Staff Policy, as appropriate.

If a staff member feels unable to raise their concerns/issues with their Headteacher or feels that their genuine concerns are not being addressed, they must refer to the Whistleblowing Policy and/or contact the trust or the NSPCC Whistleblowing advice line directly.

## For Early Years

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Trust Managing Allegations Against Staff Policy for more detail).

## Managing allegations about staff

The school has policies and procedures (see above list) for dealing with allegations against staff (and volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. These procedures follow the DfE guidance *Keeping Children Safe in Education 2019*, and should be used where a member of staff or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child, OR
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

**All allegations will be reported by the Headteacher immediately or to the Chair of the Local Governing Body and the Education Director in the initial stages where the Headteacher is the subject of the allegation.**

**In the cases of all allegations against staff or volunteers the Headteacher will then inform the relevant Education Director who will escalate this to the CEO, the COO and the Head of HR at the Trust as a serious reportable issue.**

**Allegations must not be shared with other staff, parents or pupils.**

When a person reports an allegation of abuse against a member of staff or volunteer at the school which appears to meet the above criteria, the Headteacher will immediately contact the LA designated officer(s) before further action is taken. Where there is any doubt as to whether the criteria have been met the LADO must be informed.

The accused person will be informed of the allegation as soon as possible after the designated officer has been consulted. Appropriate support and a representative will be provided to keep the accused person informed of the progress of the case as appropriate.

Suspension will **not** be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure:

- the safety and welfare of the pupils or pupil concerned; and
- the need for a full and fair investigation.

Detailed guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm, or of allegations of harm toward a pupil. This guidance is contained in the Staff Code of Conduct, and the Staff Handbook/Induction Handbook if the school has one.

## Ceasing to use staff

If the school ceases to use the services of an accused member of staff (or a Local Governor/ member or volunteer) because they are unsuitable to work with children, a compromise agreement will **not** be used. A referral to the Disclosure and Barring Service (DBS) will be made. If the staff member is a teacher, a referral will be made to both the Disclosure and Barring Service and the Teaching Regulations Agency (TRA) **by the school with the support of the Regional Leads if required**. Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the Local Governors and the Trust without delay.

## Resignation

If a member of staff (or Local Governor or volunteer) tenders his/her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the school. Resignation will not prevent an investigation or the conclusion of an investigation and may prompt detailed referrals being made to the DBS and/or the TRA.

## Criminal proceedings

The school will consult with the LA designated officer(s) following the conclusion of a criminal investigation as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed.

## Record keeping and retention of documentation

Details of **substantiated** (sufficient evidence to prove the allegation) and **unsubstantiated** (insufficient evidence to prove or disprove the allegation) allegations will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of ten years from the date of the allegation, if this is longer.

**Substantiated** allegations will be referred to in references.

**Unsubstantiated** allegations will not normally be referred to in references requests, but if the Headteacher is explicitly requested, s/he will seek the advice of the LA designated officer(s) before responding to the request.

Allegations that are found to have been **malicious** (sufficient evidence to prove the allegation and there has been a deliberate act to deceive), **false** (sufficient evidence to disprove the allegation) or **unfounded** (where there is no evidence or proper basis which supports the allegation being made) will be removed from the employee's records.

## Malicious and unsubstantiated allegations made by students/pupils

Where an allegation by a student/pupil is shown to have been deliberately invented or malicious, the Headteacher will consider whether to take disciplinary action in accordance with the school's behaviour policy. The LA designated officer(s) will refer the matter to children's social care to determine whether the child is need of services, or to consider if the child might have been abused by someone else. Schools may choose to note this malicious allegation on the student's/pupil's record for information only, where a pattern of malicious referrals might be made. (See Annexe B KCSIE 2019 for further guidance)

## Whistleblowing

All staff are required to report to the Headteacher, or the Education Director in his/her absence, any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

Concerns regarding the Headteacher should be made to the Education Director whose contact details are readily available to staff. Advice should be sought from the LADO, the Trust or the NSPCC Whistleblowing advice line who provide independent advice. Concerns regarding proprietors or Trustees should be referred to the LADO and the Education Director.

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

More information about whistleblowing can be found within the Whistleblowing Policy or at <https://www.gov.uk/whistleblowing>

## Safer recruitment

To ensure that children are protected whilst at this school, we will ensure that our staff and volunteers are carefully selected, screened, supervised and trained.

We accept that it is our responsibility to follow government guidance regarding safer recruitment.

We will ensure that the checks will be made in conjunction with the relevant agencies including the Teaching Regulation Agency (TRA), the Disclosure and Barring Service (DBS) and the Home Office.

The checks include:

- Identity, including name and current address
- Right to work in the UK
- Qualifications
- Police checks through the DBS
- Children’s barred list
- Overseas checks
- References (in accordance with the Safer Recruitment Policy)
- Medical Fitness
- Prohibition from teaching
- Prohibition from Management (where applicable to the role)
- Childcare (Disqualification) Regulations 2009 (for staff member but not “disqualification by association)

These checks will be made in accordance with the Safer Recruitment Policy. They will be made in accordance with the role applied for.

All checks made will be recorded on the school’s Single Central Record (also known as the Register).

**Full details of our safer recruitment procedures are set out in the school’s Safer Recruitment Policy.**

## E-Safety

We recognise that technology is a significant component of many safeguarding issues and can provide the platform for harm. We endeavour to do everything possible to identify, intervene and escalate any incident appropriately.

The areas of risk are categorised into three areas:

- Content: being exposed to illegal, inappropriate or harmful material
- Contact: being subjected to harmful online interaction with other users, and
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm

With a view to this, we will ensure that appropriate filters and monitoring systems are in place at school in order to reduce the risk.

(Further advice for appropriateness of filters, including for Prevent duty, can be found in KCSIE 2019 and *UKSIC: appropriate filtering and monitoring*).

We will also ensure that pupils/students will be taught about safeguarding, including online safety.

Full details are set out in the Trust **E-Safety Policy** and in the government guidance document [Teaching online safety in school, June 2019](#).

## Mobile phones and cameras

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 members' personal phones will remain in their bags or cupboards during contact time with pupils.

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

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

## Record-keeping

We will hold records in line with our records retention schedule and Retention Policy.

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

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Our records are paper based and held on CPOMS. Paper based records are locked in a cabinet in the SENCO Office in the staffroom. Records are retained until the pupil reaches the age of 26 years. Records remain confidential at all times unless authorised by local authority officials to release information through them.

## Training

### All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, 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 in line with advice from our local safeguarding children board and the national guidance/initiatives.

The DSL will plan the training cycle so that it covers all aspects of child protection and safeguarding according to the school's contextual needs and in line with the Trust training content overview.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Volunteers and agency/supply staff working in school will receive appropriate training.

All staff of the Trust, including Trustees, members of the central team, Regional Safeguarding Leads and Education Directors will undertake training relevant to their roles and responsibilities.

### The DSL and deputies

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

### Local Governing Body Members

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

### Staff who have contact with pupils and families

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

## Prevention

We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

**The school will therefore:**

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with children, e.g. through safety questionnaires, participation in anti-bullying initiatives, participation in the UNICEF Rights Respecting Schools Award or other effective ways of teaching children about their rights (United Nations Convention on the Rights of the Child).
- Encourage self-esteem and self-assertiveness, through the curriculum as well as relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Supporting families through Early Help initiatives.
- Provide explicit teaching on safeguarding, Equalities and British Values, which is mapped throughout the curriculum.
- Provide specific teaching on Relationships Education, Relationships and Sex Education and Health Education as outlined by the government requirements.

**As well as ensuring that we address child protection concerns, we will also ensure that children who attend the school are kept safe from harm whilst they are in our charge.**

To this end, this policy must be seen in light of the following school's policies and procedures.

- Anti-bullying Policy: the school will also ensure that bullying is identified and dealt with promptly. Sexualised behaviour, or bullying that is homophobic, trans gendered or gender prejudiced in nature, or where there appear to be links to domestic abuse in the family home will be addressed via local child protection procedures. Concerns about forced marriage and honour-based violence will be addressed via local child protection procedures.
- Staff Safer Recruitment Policy.
- Staff Code of Conduct.
- Racist & Discriminatory Incidents.
- Confidentiality and Data Protection.
- Behaviour Policy and the school rules.
- Health and Safety Policy.
- Physical intervention/Restraints
- Allegations made against members of staff.
- Tackling Extremism and Anti-Radicalisation (PREVENT) Policy.
- Young Carers.
- Missing Pupils Policy.
- Looked-After Children Policy
- Attendance and Punctuality Policy.
- Registration of Pupils Policy.
- E-Safety Policy.
- Curriculum Policy.

**That any harm caused by other pupils can be minimised, we will pay particular attention to:**

- **Personal, Social and Health Education and Sex and Relationships Education:** child protection issues will be addressed through the curriculum as appropriate. Further details can be found in **Sex Education and Relationships Policy**.

## Alternative Provision

Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil.

Schools should obtain written confirmation from the alternative provider that appropriate safer recruitment checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own and agency staff.

## Adults who supervise children on work experience

Schools organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm.

Consideration must be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations would include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- unsupervised themselves; and
- providing the teaching/training/instruction frequently (more than three days in a 30-day period, or overnight).

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. If so, the school will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person and receive confirmation in writing.

Schools are not able to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience.

If the activity undertaken by the child on work experience takes place in a 'specified place', such as a school or college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity. In these cases, and where the child is 16 years of age or over, the work experience provider should consider whether a DBS enhanced check should be requested for the child/young person in question. (DBS checks cannot be requested for children/young people under the age of 16.

## Children staying with host families (homestay)

Schools quite often make arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related i.e., as part of a foreign exchange visit or sports tour, often described as 'homestay' arrangements (see Annex E of KCSIE 2019 for further details).

School should:

- Consider the suitability of the adults in the host families.

- Obtain a DBS enhanced certificate with barred list information for any adults in the host home. (Where these are volunteer hosts, the check can be obtained free of charge by the school).

NB Where there are 16-18-year-olds also living in the house, school can obtain an enhanced DBS check for these but cannot request a Barred list check.

Where schools arrange overseas homestays for their own students, they should liaise with their partner schools abroad to establish a shared understanding of the arrangements in place before and during the visit. They should be satisfied that the arrangements are appropriate and sufficient to safeguard their pupils. The school retains the safeguarding responsibility for their students.

Where 'homestays' extend to 28 days or more for a child aged under 16 (under 18 if the child has disabilities) this may amount to 'private fostering' (Children's Act 1989) and must be treated accordingly.

### **Private fostering - LA notification when identified**

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

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

(A comprehensive guidance on the circumstances in which private fostering may arise can be found at Annex A KCSIE 2019.)

### **NSPCC**

- The school will clearly advertise the NSPCC contact and Child Line details with a statement about their statutory powers to take action to safeguard children.
- The school will clearly advertise the NSPCC dedicated helpline for reporting concerns/ suspicions regarding Female Genital Mutilation (FGM) and Gangs.
- The school will clearly advertise the NSPCC Whistleblowing advice line which provides free advice for professionals who wish to raise concerns about how child or young adult protection issues are being handled in their own or other organisations.

### **School premises**

The school will take all practicable steps to ensure that school premises are as secure as circumstances permit, conducting regular risk assessments and maintaining a log of risk assessments, and other health and safety checks. All reportable incidents will be reported to the Trust promptly and health and safety processes followed.

Visitors and parents are not allowed into school buildings without a visitor's badge and will be accompanied by a member of staff whilst inside the building/s. Visitors wishing to enter a school building must sign in on arrival and sign out again on departure. Un-badged and unaccompanied visitors inside buildings will be challenged by a member of staff and escorted to the office to complete the signing-in procedures. Those visiting the school site to collect or drop off children or to watch matches

or concerts are restricted to appropriate areas and will be directed as to which locations are available to them.

Schools will check the identity of all new agency staff on arrival (by requesting photo id) and ensure the person presenting themselves for work is the same person that the agency has provided vetting checks for.

### **Before and after school activities**

Where permission has been given for the use of school premises to bodies (such as sports clubs) to provide out-of-school-hours activities, Anthem Schools Trust expects that it will ensure that these bodies have appropriate Child Protection and Safeguarding policies and procedures (including appropriate police checks) and that there are arrangements in place to link with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with these bodies.

### **Contracted services**

Where the school contracts its services to outside providers, Anthem Schools Trust expects that it will ensure that these providers have appropriate Child Protection and Safeguarding policies and procedures, and that there are arrangements in place to link with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the provider. (See also the Trust **Safer Recruitment Policy**).

### **Lettings**

As part of the school's letting procedures, all reasonable checks will be made to ensure hirers will not be using the school premises to promote any extremist views. The school will follow guidance set out in Tackling Extremism and Anti-Radicalisation (Prevent) and Lettings policies.

### **Monitoring and evaluation of safeguarding procedures**

Any serious child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Education Director and the Trust. In addition, the DSL will monitor the operation of this policy and its procedures and will make a termly report to the Local Governing Body and termly reports to the Trust.

The Trust will undertake an annual review of this policy and how their duties under it have been discharged. They will ensure that any deficiencies or weaknesses with regard to child protection arrangements at any time are remedied or reported without delay.

Prior to any review of the policy, feedback will be sought from Education Directors, Regional Safeguarding Leads, student school council, pupils, staff and parents on the effectiveness of the policy.

The Safeguarding Strategic Group, formed of the Regional Safeguarding Leads, the Secondary DSLs and the CEO meet three times a year to review the progress of child protection and safeguarding against the action plan.

The Trust will undertake an annual safeguarding review to monitor policy into practice. The findings will be shared with the Trustees, the Education Directors, the Safeguarding Strategic Group and the schools.

The Trust will ensure, through the Regional Safeguarding Leads, that all actions arising from the review are addressed appropriately and in a timely manner.

Staff should receive training on how to identify vulnerable learners and understand that there may be additional safeguarding vulnerabilities for pupils with SEN and disabilities (SEND) and how those barriers can be overcome. 'Safeguarding disabled children, practice guidance 2009'

## Additional safeguarding information

There are three appendices attached to this policy which supplement the information in this policy, they are:

- Appendix 1: Types of abuse
- Appendix 2: Specific contextual safeguarding issues
- Appendix 3: Documents used to report, record and refer

Links with other policies Reporting information can be found on:

<http://www.oscb.org.uk/reportingconcerns/>

## Links with other policies

This policy links to the following policies and procedures:

- Anti-bullying (which includes Racist issues)
- Attendance
- Behaviour (which includes Positive handling)
- Complaints
- Curriculum
- First aid
- Health and safety
- Induction
- Managing Allegations against staff
- Managing Medicines Policy
- Online safety
- Privacy notices
- Risk Management
- Safer Recruitment
- Sex and relationship education
- Staff code of conduct
- Whistleblowing

## Additional contact information

### NSPCC helplines

Main contact: 0800 800 5000 ([help@nspcc.org.uk](mailto:help@nspcc.org.uk))

ChildLine: 0800 1111

FGM direct line: 0800 028 3550

Gangs direct line: 0808 800 500

Whistleblowing advice line: 0800 028 0285

## Forced Marriage Unit

020 70080151 ([fm@fco.gov.uk](mailto:fm@fco.gov.uk))

## Tackling Extremism and Radicalisation (Prevent)

[counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

020 7340 7264

## Trust contacts (Anthem)

Regional Safeguarding Leads – Jo Dunphy

Education Directors: Mrs Karen Walker

**This Policy was approved by the Trustees of Anthem (formerly CfBT) Schools Trust on 14 October 2019.**

**Date reviewed:** September 2019

**Signed by:**



Andy Yarrow, Chief Executive, Anthem Schools Trust

**This policy will be reviewed annually**

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2019.**

## Appendix 1: Types of abuse

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

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying peer to peer abuse and sexting), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- Exploitation or corruption.
- Psychological abuse including radicalisation.
- Honour-based violence used to control behaviour within families to protect perceived cultural or religious beliefs or honour, including forced marriage and FGM.

**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).
- Female genital mutilation (FGM) Appendix 2.
- Child Sexual Exploitation (CSE) Appendix 2.
- Forced marriages.

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

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

- Once a child is born, neglect may involve a parent or carer failing to:
  - provide adequate food, clothing and shelter (including exclusion from home or abandonment)
  - protect a child from physical and emotional harm or danger
  - ensure adequate supervision (including the use of inadequate care-givers)
  - ensure access to appropriate medical care or treatment.

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

## Appendix 2: Specific contextual safeguarding issues

### Children missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

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
- 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 and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the 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 in immediate danger or at risk of harm.

### Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual/group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. It does not always involve physical contact; it can occur through the use of technology. (*Child Sexual Exploitation* February 2017).

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can 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.

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.

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.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

## 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.

Page 11 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 [fm@fco.gov.uk](mailto:fm@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 by which a person comes to support terrorism and forms of extremism. 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.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out on Page 10 of this policy, including discussing their concerns with the DSL.

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

## 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.

All visitors to our setting, 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, two staff members will remain in the office with the child/ren until parents or carers have been contacted. Failing any contact for an hour, the police will be called.

## 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 the police and the local authority assuming we have been unable to contact parents or carers.

## Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. This offence come under the Voyeurism (Offences) Act 2019.

**Appendix 3: Documents used to report, record and refer**

This is by email using contacts listed on: <http://www.oscb.org.uk/reporting-concerns>

## Appendix 4: Useful statutory documents and guidance materials

- Children Missing Education - statutory guidance
- Data Protection Toolkit for Schools, OpenBeta, August 2018
- Government Guidance Disqualification under the Childcare Act 2006, Revised September 2018
- Guidance for Safer Working Practices, May 2019 v2
- Information sharing advice practitioners safeguarding services, July 2018
- Mental health and behaviour in schools, Nov 2018
- Ofsted Education Inspection Framework 2019
- Ofsted Inspecting Safeguarding in Early Years Education and Skills, September 2019
- Ofsted Positive environments where children can flourish, 2018
- Ofsted School Inspection Handbook Section 5, September 2019
- Ofsted School Inspection Handbook Section 8, September 2019
- Ofsted Update Nov 2016, Prohibition Checks
- Prevent Duty - Departmental Advice, June 2015
- Regulated activity in relation to children 2012
- Searching screening and confiscation, January 2018
- Sexting in schools and colleges UKCCIS, Aug 2016 FINAL
- Teaching online safety in school, June 2019
- What to do if you're worried a child is being abused, March 2015