

# Child Protection and Safeguarding Policy

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Consilium  
Academies

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## Policy Statement and Principles

At Consilium we exist to value each other and bring out the best in everyone. Our safeguarding and child protection policy ensures that students are safe, happy and have the opportunity to flourish in all aspects of their lives. This policy is one of a series in the Trust's integrated safeguarding portfolio. This includes the policies for safeguarding and child protection, staff code of conduct, antibullying, PSHE, safer recruitment, whistleblowing, complaints, student behaviour and conduct and e-safety.

This policy is available on the Trust and individual academy websites.

Our core safeguarding principles are:

- The Trust responsibility to safeguard and promote the welfare of children is of paramount importance.
- Safer children make for outstanding learners.
- The voice of the student is valued and respected in all aspects of safeguarding.
- Policies will be reviewed at least annually with contributions from key stakeholders in the academy community unless an incident or new legislation or guidance suggests the need for an interim review.

## Child Protection Statement

At Consilium Academies we recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that students receive effective support, protection and justice.

The procedures outlined in this policy are mandatory for all staff, Local Academy Board members and volunteers working on behalf of the academy and, where applicable, are consistent with those of the Local Safeguarding Children's Boards. We expect agencies and other organisations (including those who hire our facilities) to adhere to our procedures as a minimum standard or operate their own effective Child Protection Policy.

## Policy Principles

At Consilium Academies:

- All young people have a right to protection.
- The welfare of students is paramount.
- All students, regardless of age, gender, ability, culture, race, language, religion or sexual identity/orientation have equal rights to protection.
- All staff and Local Academy Board members have an equal responsibility to act on any suspicion or disclosure that may suggest a student is at risk of harm.
- Confidentiality will be upheld at all times and in line with the Data Protection Act.
- The pastoral structure ensures that all staff and students involved at any stage of the child protection process have adequate support and the required intervention.

The Consilium Trust is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

## Policy Aims

- To provide all stakeholders with the necessary information to enable them to meet their safeguarding and child protection responsibilities.
- To ensure consistent outstanding practice in all aspects of safeguarding and child protection across the academy.
- To demonstrate the academy's commitment to child protection and safeguarding to the wider community.

- To ensure that data gathered over the previous academic year impacts on the adjustments made to the safeguarding policy.
- To ensure that all staff are aware of their statutory responsibilities with respect to safeguarding
- To ensure that staff are properly trained in recognising and reporting safeguarding issues

## 1. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners. (The Local Authority, a clinical commissioning group, Chief Office of Police) 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 students
- [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 conducting an interview 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 students at the school
- [Education Act 2002](#)
- [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.

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

In addition to referring to multi-agency procedures that have been put in place by the three safeguarding partners, the policy reflects locally agreed procedures as set out in the relevant policies published by our local authority partners.

## 2. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- 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 2 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

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

Children includes everyone under the age of 18.

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

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

### 3. 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 (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)

### 4. Roles and responsibilities

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

#### 4.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding including the child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and DDSL/s, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

Section 15 and appendix 5 of this policy outline in more detail how staff are supported to do this.

#### 4.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The DSL for each school is listed in appendix 1. The DSL takes lead responsibility for child protection and wider safeguarding.

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

Each Academy has a designated Safeguarding e-mail address listed in appendix 1. This contact should be used outside of school hours.

When the DSL is absent, the DDSL/s— also listed in appendix 1 – will act as cover.

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

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Ensure that they are appropriately trained in all areas of child protection and safeguarding, regularly keeping up to date with new legislation and guidance and regular updates within this field
- Ensures that up to date legislation and guidance on child protection and safeguarding is disseminated to relevant stakeholders
- Ensure that all records of concerns or disclosures are responded to appropriately with detailed accounts recorded and that information is stored securely.
- Reviews and updates the Safeguarding and Child Protection Policy annually.
- Liaises with the relevant LAB member to ensure that there is a period of consultation with all staff within the academy regarding the content of the Child Protection and Safeguarding policy.
- Ensure that the Safeguarding and Child Protection Policy is available publicly on the Academy website.

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

The full responsibilities of the DSL and the DDSL/s are set out in their job description.

#### 4.3 The Trust Board and Local Academy Board

The Trust board will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

The Trust will appoint a Link Trustee (or equivalent) to monitor the effectiveness of this policy in conjunction with the board.

It is the responsibility of the Trust Board and Local Academy Board members to:

- Read Keeping Children Safe in Education.

- Accept the responsibility to implement procedures to provide a duty of care for young people, safeguard their well-being and protect them from abuse
- Respect and promote the rights, wishes and feelings of all students
- Recruit, train and supervise its staff to adopt best practice to safeguard and protect young people from abuse and to reduce the likelihood of allegations made against them
- Require staff to adopt and abide by the Trust Safeguarding and Child Protection policy
- Understand the coordinated approach the academy has to offer when dealing with outside agencies, Early Help and Children's Social care
- Respond to any allegations appropriately and implement the appropriate disciplinary and appeals procedures, if required. Respond to allegations made against the Head Teacher, or Trust officers complete investigations and follow up procedures in conjunction with the Trust Officers where appropriate.
- With the Academy Leadership Team, ensure that mechanisms are in place to enable staff to understand their responsibilities for safeguarding and protecting students. Regular audits are completed by The MAT board to ensure safeguarding meets all national, regional and Ofsted criteria.

Section 15 of this policy has information on how Local Academy Board members are supported to fulfil their role.

#### 4.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including 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)

#### 5. Confidentiality

##### Confidentiality and sharing information

The right of the student to confidentiality and privacy will be respected and all communications about any case will be kept to a minimum on a 'need to know' basis. This ensures that information being released into the public domain does not compromise evidence. All staff are informed through annual training of the principles and protocols of best practice when sharing information. The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

Students should be reassured that their best interests will be maintained. However, staff cannot offer or guarantee confidentiality and should ensure that the student understands that all disclosures made to the adult will be shared with the DSL/DDSL.

The Trust is committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child.

Child protection information will be stored and handled in line with the Data Protection Act 1998 and Information Sharing Guidance for practitioners (DFE 2018). Information sharing is guided by the following principles:

The information is:

- Necessary and proportionate
- Relevant

- Adequate
- Accurate
- Timely
- Secure

Information sharing decisions will be recorded whether or not the decision is taken to share. The DSL/DDSL will normally obtain consent from the student and/or parents and carers to share sensitive information within the academy or with outside agencies. Where there is a good reason to do so the DSL/DDSL may share information without consent and will record the reason for not obtaining consent.

- Child Protection records are normally exempt from the disclosure provisions of the data protection act which means that students and parents/carers do not have an automatic right to see them. If any member of staff receives a request from a student/parent/carer to see child protection records, they must refer the request to the Headteacher. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

## 7. Recognising abuse and taking action

Staff, volunteers and Local Academy Board members must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children’s social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger following the local procedures put in place by the three Safeguarding partners. Anyone can make a referral.

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

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

### 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so



### 7.3 If you discover that FGM has taken place or a student 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 student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4.

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

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

All staff must be aware of what the local procedures for making a referral are.

### 7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 14 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.

### 7.5 Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL/DDSL and Vulnerable Students officer offer an Early Help intervention level of support for all students and families linked to the academy. Early Help is a way of supporting Children and families to build on existing strengths to promote wellbeing and a greater quality of life. Early Help is about identifying needs within families at an early stage, providing preventative support and interventions before problems become more complex and entrenched. Early help support is a preventative layer that does not involve social services.

Early Help is a multi-agency approach to supporting families. The academy will work individually or with other organisations to support families achieve positive changes. On many occasions the academy will support families holding the case within school, support/action plans will be agreed between school and the family involved and clear achievements will be agreed. Once this has been completed a review period will be decided and a review meeting will be completed.

On some occasions it will be agreed at an initial meeting that further support would be beneficial from the Early Help hub. If this is the case an Early Help assessment will be completed and referred into the Early Help hub for assessment and possible allocation of a worker. If a worker is allocated an Early Help meeting will be arranged and the Academy will attend to support the family/student.

On occasions, the Early Help team will ring the academy to gather educational reports for students in our care when a referral has been received from an outside agency. If this is the case, the academy will share information regarding students with the team. Consent is gathered from the Early Help team at initial contact with the family for this information to be shared.

The DSL will keep cases 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.

## 7.6 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 Trust has students from different Local Authorities and therefore protocols for referrals will be adhered to according to the procedures laid out within the LSCB protocol for the area. Dependent on the level of need for each individual case and the threshold guidelines for each Local Authority a referral to Children Social Care or Early Help will be completed to support the Child and Family.

If a referral to Children's Social Care has been completed and an assessment has been completed, then the student may be placed on either a Child in Need plan (Section 17) or a Child Protection Plan (Section 47). The Academy is committed to inter-agency working and will enable social workers to have access to students to enable them to complete Section 17 or 47 investigations. Students may on occasions be seen by Children's social services in the Academy and staff will ensure that this is facilitated as smoothly as possible. 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.

Relevant members of staff are likely to be asked to attend a child protection conference or other relevant core group meetings about an individual student and will need to have as much relevant updated information about the child as possible. A child protection conference will be held if it is considered that the child/children are suffering or at risk of significant harm.

All reports for a child protection conference should be prepared in advance of the meeting and will include information about the child's physical, emotional, intellectual development and wellbeing, as well as relevant family related issues. This information will be shared with the parents/carers. The academy will monitor students whose names are on a Child Protection Plan in line with what has been agreed at Child Protection Conference.

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.

## 7.7 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 Local Academy Board members can call to raise concerns about extremism with respect to a student. 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

### 7.8 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

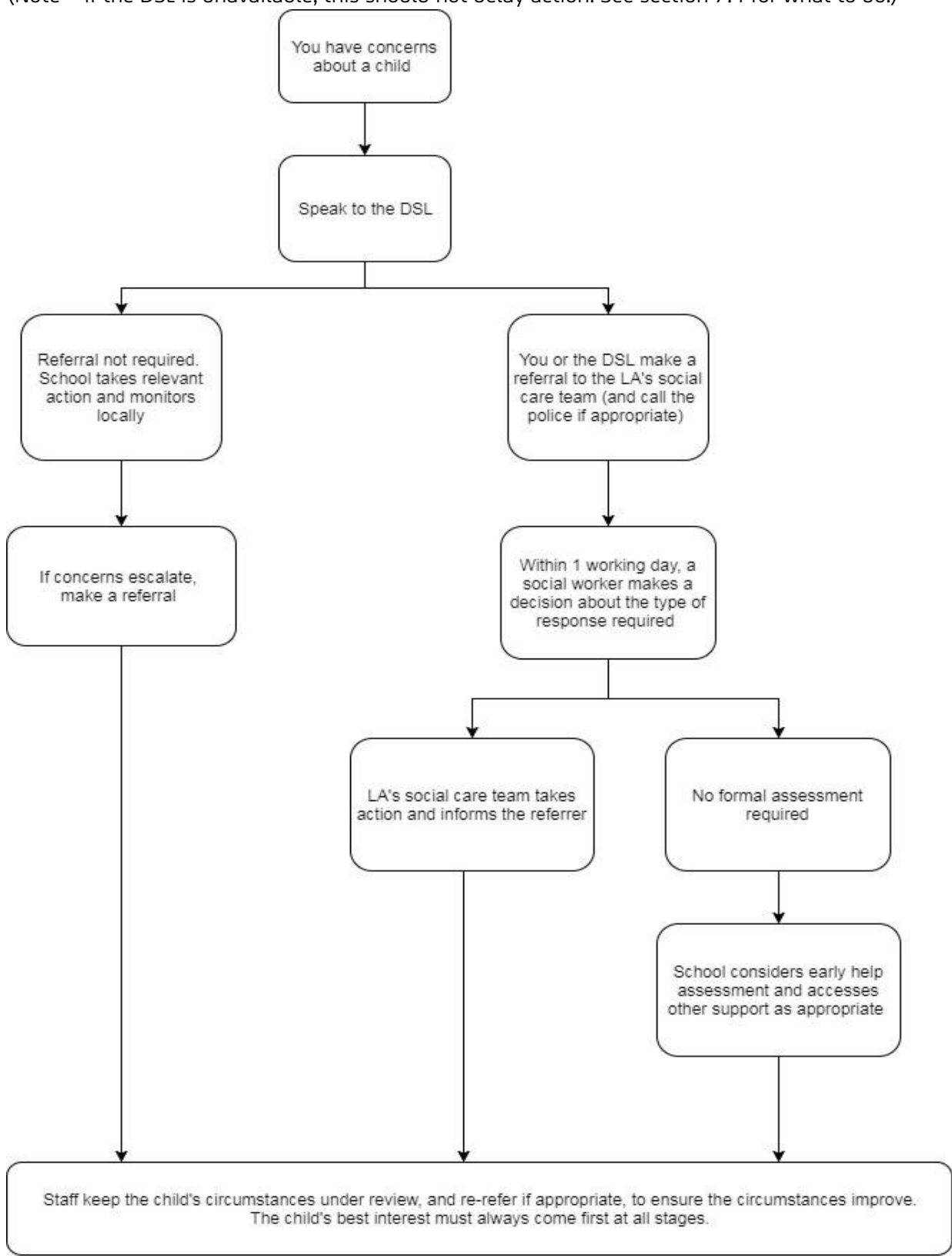
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

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

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



7.9 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of the Local Academy Board.

The Headteacher/Chair of the LAB will then follow the procedures set out in appendix 4, if appropriate and will always at all times seek advice from the Trusts Human Resources Team.

## 7.10 Allegations of abuse made against other students

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”.

The DfE states ‘peer on peer abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action’.

Children with special educational needs and disabilities are more vulnerable to sexual violence and harassment and staff should be aware that additional barriers can exist when recognising abuse in these children. Children who are LGBT+ or perceived to be, may also be targeted by their peers and harassed or assaulted.

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

Most cases of students hurting other students 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. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves physical abuse (including hitting, kicking, shaking, biting, hair pulling etc)
- Involves students 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 sexting).
- Bullying (Racist, religious, homophobic, gender reassignment, disablist, cyber etc.)
- Criminal exploitation
- Gang activity and Youth violence
- Domestic violence

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

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

It is vital for professionals to understand that the child who is perpetrating the abuse may also be at risk of harm. Staff within the academy should make every effort to ensure that the perpetrator is also treated as a victim and that relevant assessments and support mechanism are offered to them too. If Staff within the academy suspect this form of abuse they should raise this immediately with the DSL/DDSL.

Students will be supported by the pastoral teams in school, families will be informed of our concerns for both the victims and potential perpetrators and support and individual plans put in place to ensure the wellbeing for all students.

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys

- Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially.
- Ensuring staff are trained to understand that a student 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
- Ensuring the teaching of the new curriculum for Relationships, Sex and Health Education (RSHE), staff must have regard to the statutory guidance. This will ensure that the students understand what positive, healthy and respectful relationships look like, on and offline.

Additional guidance and support is available on the NSPCC website:

- <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/online-abuse/legislationpolicy/practice/>
- The NSPCC has a dedicated helpline 0800 136 663 to help support anyone who has experienced sexual abuse or has concerns about someone. More information is also available at: [Dedicated helpline for victims of abuse in schools NSPCC](#).
- DfE: Sexual Violence and Sexual harassment between children in schools and colleges, May 2018
- Part 5 of Keeping Children Safe in Education (KCSIE) provides detailed guidance about child-on child sexual violence and sexual harassment, including responding to reports of abuse and protecting victims. Part 5 also signposts to the wider specialist support that is available.
- 'Working Together to Safeguard Children' is very clear on how schools should work with their local multi-agency children's partnerships as a relevant agency and how concerns about a child should be referred.
- Ofsted guidance: ['Inspecting Safeguarding in Early Years and Skills Settings'](#).

### 7.11 Sexting

Sexting is the creation and distribution of explicit, nude, or semi-nude images via the internet or by mobile phone. It can also include sexually explicit texts. The law states that it is a criminal offence to, ask, receive, send, distribute and own any image of an under 18-year-old.

Academy staff are fully informed and trained to understand and manage incidents of sexting within school. If you see or are shown an image on a young person's phone in school contact refer the incident immediately to the DSL/DDSL to investigate further.

Students within the academy are aware through the PHSE and SMSC curriculum the risks and dangers associated with sexting and the law associated with this form of communication. Students are spoken to regularly about this use of social media. Further information can be found in the academy's E-Safety policy.

#### Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, download or share the imagery yourself, or ask a student 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 student to delete it
- Ask the student(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 student(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 student(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 meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the imagery is under 13
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (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.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

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

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

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the safer school's police officer by dialling 101. Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Students are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

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

Students 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 sexting is also shared with students so they are aware of the processes the school will follow in the event of an incident.

## 8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## 9. Students with special educational needs and disabilities

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

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

## 10. Students with a social worker

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

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

## 11. 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.

Each Academy has a designated member of staff 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 student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## 12. 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 students are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with students.

Staff will not take pictures or recordings of students 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.

## 13. Complaints and concerns about school safeguarding policies

### 13.1 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 4).

### 13.2 Other complaints

Other complaints will be handled in conjunction with the Trust's complaint policy which can be found on the Trust's website.

### 13.3 Whistle-blowing

Whistle-blowing allegations will be handled in conjunction with the Trust's whistle-blowing policy which can be found on the Trust website.

## 14. Record-keeping

We will hold records in line with our records retention schedule.

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

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.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Records are kept using CPOMS. The DSL has oversight of all safeguarding incidences and all information is shared securely on the CPOMS portal.

In addition:

- Appendix 3 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

## 15. Training

### 15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing 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 the 3 safeguarding partners.

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

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.

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

Volunteers will receive appropriate training, if applicable.

All staff also receive safeguarding training/updates via electronic bulletins, dedicated INSET time and briefings, particularly where new legislation/guidance is in place.

All volunteers and agency staff visiting the academy are greeted with a basic awareness and safeguarding briefing completed by the DSL/DDSL. All new staff to the academy also complete a program of induction that involves the Annual Safeguarding training. All new staff are also required to complete online training for Child Protection and Prevent; they are also provided with the following documents to read prior to their start date;

- Keeping Children Safe in Education 2020 (Part 1 and Annex A)
- Behaviour Policy
- Staff Code of Conduct

Records will be kept of all staff training naming individuals and detailing what training they have received and when.

### 15.2 The DSL and DDSL/s

The DSL and DDSL/s 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 experience supervision in line with regulatory requirements and provide supervision to designated staff within the organisation.

They will also undertake Prevent awareness training.

### 15.3 Trust and Local Academy Board Members

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

### 15.4 Recruitment – interview panels

At least one person conducting any interview 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 will be in line with local safeguarding procedures.

In addition, The Trust complies with Keeping Children Safe in Education 2020 and the requirements of the LSCBs by carrying out the required checks and verifying the identity of applicants, their qualifications and employment history.

All personnel who are employed by or undertake voluntary work in the academy will be DBS checked, this includes LAB Members and Trustees. The Headteacher will have responsibility for ensuring the Single Central Record is rigorously maintained. It is the responsibility of staff to ensure that where visitors on site are left unaccompanied with students, they have DBS clearance to do so. The academy will obtain written confirmation from supply agencies or third party organisations that agency staff or other individuals who may work in the academy have been appropriately checked. Trainee teachers will be checked either by the academy or by their training provider from whom written confirmation will be obtained. DBS checking will be rigorous and records will be kept of references obtained in the appointment process detailing when they were obtained and who checked them.

The Single Central Record will be complete and kept securely in one place. There will be limited access to the register and the people who have access will be named and advised.

### 15.5 Staff who have contact with students 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.

## 16. Monitoring arrangements

This policy will be reviewed annually by The Director of Education responsible for Safeguarding and will be approved by The Trust Board.

## 17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- First aid
- Privacy notices
- Whistle Blowing

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

## Appendices

### Appendix 1: Important Academy Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)		
Deputy DSL		
Local authority designated officer (LADO)		
Chair of Local Academy Board members		
Channel helpline		020 7340 7264

### Key Personnel

NAME	ORGANISATION	CONTACT EMAIL
Tracey Greenough	Consilium Academies Trust	<a href="mailto:safeguarding@consilium-at.com">safeguarding@consilium-at.com</a>
Colin Abraham	Armthorpe Academy	<a href="mailto:safeguarding@armthorpe.org.uk">safeguarding@armthorpe.org.uk</a>
Melanie Howard	Buile Hill Academy	<a href="mailto:safeguarding@builehill.org.uk">safeguarding@builehill.org.uk</a>
Kath Barratt	Ellesmere Park High School	<a href="mailto:Katharine.barratt@salford.gov.uk">Katharine.barratt@salford.gov.uk</a>
Alan Haddon	Heworth Grange School	<a href="mailto:safeguarding@heworthgrange.org.uk">safeguarding@heworthgrange.org.uk</a>
Gareth Webb	Moorside High School	<a href="mailto:safeguarding@moorsidehigh.com">safeguarding@moorsidehigh.com</a>
Kelly Neeson	Thornhill Academy	<a href="mailto:safeguarding@thornhillacademy.com">safeguarding@thornhillacademy.com</a>
Leigh Coates	Washington Academy	<a href="mailto:safeguarding@washingtonacademy.com">safeguarding@washingtonacademy.com</a>
Karen Phillips	Wyvern Academy	<a href="mailto:safeguarding@wyvernacademy.org">safeguarding@wyvernacademy.org</a>

### Local Safeguarding Children's Board information

#### Wyvern Academy- (Darlington LSCB)

LADO - Carole Glasper Tel: 01325 406459 Email: [lscb@darlington.gcsx.gov.uk](mailto:lscb@darlington.gcsx.gov.uk)

#### Armthorpe Academy – (Doncaster – LSCB)

LADO - Jim Foy Tel: 01302 737748 Email: [LADO@doncaster.gcsx.gov.uk](mailto:LADO@doncaster.gcsx.gov.uk)

#### Heworth Academy – (Gateshead LSCB)

LADO - Nicholas Leon Tel: 0191 433 2653 Email: [R&Aduty@gateshead.gcsx.gov.uk](mailto:R&Aduty@gateshead.gcsx.gov.uk)

#### Buile Hill, Ellesmere and Moorside- (Salford - LSCB)

LADO Tel: 0161 603 4350 Email: [LADO@salford.gov.uk](mailto:LADO@salford.gov.uk)

The Bridge Partnership (cp referrals) Tel: 0161 603 4500 Email: [worriedaboutachild@salford.gov.uk](mailto:worriedaboutachild@salford.gov.uk)

#### Washington and Thornhill Academy (Sunderland- LSCB)

LADO - Danielle Rose Tel: 0191 561 7007 Email: [lado@togetherforchildren.org.uk](mailto:lado@togetherforchildren.org.uk)

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), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

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

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- 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, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- 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

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

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

### Keeping Children Safe in Education-Update January 2021 (Post EU Exit)

From 1<sup>st</sup> January 2021, individuals who have lived or worked outside the UK must undergo the same checks as enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered.

These checks could include, where available:

- Criminal records checks for overseas applicants
- Obtaining a letter of professional standing from the professional regulating authority in which the applicant has worked.

Where available, such evidence will be considered together with information obtained through other pre-appointment checks. Where this is not available, we will seek alternative methods of checking suitability.

Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, we will consider the circumstances that led to the restriction or sanction being imposed when considering the candidate's suitability (DfE Guidance: [Recruit teachers from overseas](#)).

### Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- 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.

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.

### 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 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

### Trustees and Local Academy Board Members

All Trustees and Local Academy Board 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 board will have their DBS check countersigned by the secretary of state.

All proprietors, Trustees and Local Academy Board 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](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### Staff working in alternative provision settings

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### Adults who supervise students 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 student 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.

### Students staying with host families

Where the school makes arrangements for students 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.



#### Appendix 4: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- 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, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

#### Suspension of the accused until the case is resolved

Suspension 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 it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

- Redeployment within the 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 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

#### 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
- 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 headteacher (or chair of the Local Academy Board if the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately 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
- 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.
- 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 and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- 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 Academy Trust 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 staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome

- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, 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 local authority designated officer 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

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

### 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 case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer 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 or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the student(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student.

#### **Confidentiality**

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 local authority's designated officer, 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. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

### **Learning lessons**

After any cases where the allegations are substantiated, we 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

### 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 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 suffering or likely to suffer from harm, or in immediate danger.

### Child criminal exploitation

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

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

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

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

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

### Child sexual exploitation

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

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

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

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

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

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

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

[More information including definitions and indicators are included in Annex A of KCSIE \(Distinct explanations of CCE, CSE and County Lines in ANNEX A\)](#)

### 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.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in 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 and DDSL/s will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student 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 student 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 student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

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

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

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 partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our students 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 students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student 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 student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

#### Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff when entering the building

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 into the electronic signing in system when they arrive and they will be expected to wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
  - The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out
- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the 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 students or staff.

This addendum is designed to set out any changes to usual safeguarding practice during the Covid-19 epidemic. The Trust will, at all times, follow the updated guidance published by the Department for Education at: <https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/guidance-for-full-opening-schools>

All staff must read this policy and the DfE guidance on the link above to ensure they are clear on safeguarding arrangements during this period.

Where schools have any questions about the application of this policy, they should first be addressed to a Director of Education, who will escalate concerns to the Chief Executive if necessary. The Trust will consult with the Department for Education as necessary, utilising the Covid-19 helpline:

[DfE.coronavirushelpline@education.gov.uk](mailto:DfE.coronavirushelpline@education.gov.uk) Number: 0800 046 8687

### Working in Partnership with Others

The Trust takes its civic responsibilities seriously throughout this national crisis and will therefore work in partnership with other schools to ensure that vulnerable children and the children of key workers are provided for.

- Where Consilium staff are supporting another school, Consilium will provide the relevant safer recruitment details, as required by Keeping Children Safe in Education 2019.
- Where a Consilium school is acting as a hub as part of a cluster, the school will carry out appropriate risk assessments as necessary in the circumstances (determined in conjunction with the relevant Director of Education), and will ensure any staff and volunteers from other schools have been appropriately checked.

Schools in the Trust will also continue to work in partnership with their local authorities, ensuring that any advice from local safeguarding partners is fully implemented, including advice from the local authority regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need.

It will also be critical that, during this period, schools continue to work with and support children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children.

It will be important for any school whose children are attending another setting to do whatever they reasonably can to provide the receiving institution with any relevant welfare and child protection information. This will be especially important where children are vulnerable. For looked-after children, any change in school should be led and managed by the VSH with responsibility for the child. The receiving institution should be aware of the reason the child is vulnerable and any arrangements in place to support them. As a minimum the receiving institution should, as appropriate, have access to a vulnerable child's EHC plan, child in need plan, child protection plan or, for looked-after children, their personal education plan and know who the child's social worker (and, for looked-after children, who the responsible VSH is). This should ideally happen before a child arrives and, where that is not possible as soon as reasonably practicable. Any exchanges of information will ideally happen at DSL (or deputy) level, and likewise between special educational needs co-ordinators/named individual with oversight of SEN provision for children with EHC plans. However, it is acknowledged this may not always be possible. Where this is the case senior leaders should take responsibility.

Whilst schools must continue to have appropriate regard to data protection and GDPR they do not prevent the sharing of information for the purposes of keeping children safe. Further advice about information sharing can be found at paragraphs 76-83 of KCSIE.

## Designated Safeguarding Leads

Where possible, schools will ensure that there is a trained designated safeguarding lead or deputy on site at all times.

Where this is not possible, arrangements will be put in place to ensure that the schools' designated safeguarding lead, their deputy, or a designated safeguarding lead from another Trust school will be contactable by phone to deal with any concerns. In these circumstances, a senior member of staff on-site will take responsibility for coordinating safeguarding arrangements.

For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

## Support for Students

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with EHC plans.

Local authorities have the key day-to-day responsibility for delivery of children's social care. Social workers and VSHs will continue to work with vulnerable children in this difficult period and should support these children to access this provision. There is an expectation that children with a social worker will attend provision, unless in consultation with the child's social worker and family it is agreed this is not in the best interests of the child. In all circumstances where a vulnerable child does not take up their place at school or college, or discontinues, the school or college should notify their social worker.

The Trust's position is that schools must keep in contact with students by:

- Ensuring that all vulnerable students who do not attend school receive a daily welfare call, and that this call is logged. This is in addition to the school's responsibility to notify the social worker (where appropriate) that the student is not attending.
- All students who have been identified as vulnerable by the school but who do not meet the definitions above should also receive a daily call. The Designated Safeguarding Lead in conjunction with the Headteacher will be responsible for determining which students fall in to this category.
- All other students will receive a call at least once, but preferably twice per week. The purpose of these calls will be to check on the student's welfare, and also to discuss the work they have been completing to support them in remaining engaged with their education.

Throughout this period of closure, it is likely that students will spend more time than normal online. It is therefore critical that all schools provide guidance to students and parents on staying safe online, and provide a clear method for students to report any concerns. As well as reporting routes back to the school this should also signpost children to age appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content
- [CEOP](#) - for advice on making a report about online abuse

Schools should also remind students that they can email the safeguarding email address (safeguarding@...). This inbox must continue to be monitored by the Designated Safeguarding Lead. In their absence, this inbox must continue to be monitored by another trained person.

This guidance should be issued as a matter of urgency, and should be reissued on a regular basis throughout the period that Covid-19 provisions apply.

## How Staff and Volunteers Should Report Concerns

Any concerns surrounding students should be immediately referred to the Designated Safeguarding Lead and the Headteacher, and dealt with in accordance with the provisions in the Safeguarding and Child Protection Policy.

Where a concern arises about a member of staff or volunteer, this should be immediately referred to the Headteacher or, in their absence, the relevant senior member of staff. Where there are concerns about the Headteacher, these should be raised with the relevant Director of Education.

Concerns can also be sent directly to the Trust: [safeguarding@consilium-at.com](mailto:safeguarding@consilium-at.com).

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the child protection policy and where appropriate referrals should still be made to children's social care and as required the police.

All schools' approaches to dealing with any safeguarding concerns should continue to follow the principles set out in Keeping Children Safe in Education.

Schools must continue to follow their legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE. Schools should also continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral. During the COVID-19 period all referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk).

### Peer-on-Peer abuse

Given the very different circumstances schools are operating in, it may not be practicable or appropriate to follow normal protocols to deal with any allegations of peer-on-peer abuse. In these circumstances, the Designated Safeguarding Lead should determine an alternative approach in conjunction with the Headteacher. The principles of part five of Keeping Children Safe in Education should inform this approach.

### Safer Recruitment

Safer recruitment procedures for new members of staff must continue as normal throughout this period. Under no circumstances should a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Regarding members of the school or college workforce already engaging in regulated activity and who already have the appropriate DBS check, there is no expectation that a new DBS check should be obtained where that member of the workforce temporarily moves to another school to support the care of children. The type of setting on the DBS check, for example a specific category of school, is not a barrier. The same principle applies if childcare workers move to work temporarily in a school setting. The receiving institution should risk assess as they would for a volunteer (see above). Whilst the onus remains on schools and colleges to satisfy themselves that someone in their setting has had the required checks, including as required those set out in part 3 of KCSIE, in the above scenario this can be achieved, if the receiving institution chooses to, via seeking assurance from the current employer rather than requiring new checks.

Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, schools must continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

### Staff Training

Where new staff are recruited, or new volunteers enter the school or college, they should continue to be provided with a safeguarding induction. An up to date child protection policy (described above) will support this process as will part 1 of KCSIE.

The existing school and college workforce may move between schools and colleges on a temporary basis in response to COVID-19. The receiving school or college should judge, on a case-by-case basis, the level of safeguarding induction required. In most cases, the existing workforce will already have received appropriate safeguarding training and all they will require is a copy of the receiving setting's child protection policy, confirmation of local processes and confirmation of DSL arrangements.

**David Clayton**  
CEO