

"Truly I tell you, if you have faith as small as a mustard seed, you can say to this mountain, "Move from here to there", and it will move. Nothing will be impossible for you."

Matthew Chapter 17, Verse 20



Safeguarding including Child Protection Policy

Author:	Principal and Deputy Principal (DSL)
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Date of next review:	September 2024

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Introduction

Our Academy vision is “Living Well Together with Dignity, Faith and Hope”. We aspire to take dignified decisions and afford dignity to all members of our community, regardless of background or circumstance. Our position as a Voluntary Aided Church Academy means that the Christian faith has a central role in all of our actions and decisions. We strive for excellence in all that we do, enabling our student to transform their lives and to hope for happy and successful futures.

At All Saints Academy, we believe that dignity comes from being safe within the Academy and in family life. Dignity is afforded to those who are kept safe and supported in achieving healthy and happy futures. Our safeguarding policy is closely linked to our values, particular those of **trust, resilience, perseverance, determination, courage and happiness**. We also fulfil our caring ethos as a Church Academy by ensuring that as many students as possible can attend safely every day that they are able, supported by our staff who embrace our values and by ensuring that every student is safe on every day that the Academy is open.

Safeguarding and child protection is **everyone’s** responsibility. Staff work together with students, families and external agencies to ensure we have a culture of safeguarding within the Academy. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Central Bedfordshire Safeguarding Children Board (or the new safeguarding partners – October 2019). Our policy and procedures also apply to extended school and off-site activities.

This policy will be shared on our website and hard copies are available by contacting dgreenhood@asadunstable.org

1. Aims

The school aims to ensure that:

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

2. Legislation and statutory guidance

This policy is based on the Department for Education’s statutory guidance, [Keeping Children Safe in Education](#) September 2023 and [Working Together to Safeguard Children](#) September 2018, and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding children board. This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

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Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- [Equality Act 2010 \(legislation.gov.uk\)](#), which outlines the significance to school safeguarding including that schools must not unlawfully: discriminate against pupils because of their protected characteristics, consider how we support them and take positive actions to deal with any disadvantages they face.
- 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

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children’s health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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

Children includes everyone under the age of 18.

4. 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 staff are aware of the contextual safeguarding that may surround any one individual. We ensure that all children have the same protection, regardless of any barriers they may face. We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

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Matthew Chapter 17, Verse 20

- Have English as an additional language
- Are looked after children (LAC)
- 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
- Experience child on child abuse
- Suffer from Mental Health
- Experience Domestic Abuse
- At risk of Child Sexual Exploitation (CSE)
- At risk of Child Criminal Exploitation (CCE)
- At risk of County Lines
- Experience Upskirting
- Are involved in, or are victims of, serious violence
- Have been returned home from care
- Are misusing drugs/alcohol themselves
- Are frequently missing from home/care/school
- Are children missing from education (CME)
- Are showing early signs of abuse/neglect
- Are in private fostering
- Are showing signs of being drawn into anti-social or criminal behaviour including gang involvement and association with organised crime
- Are accessing alternative provision
- Are educated at home
- Are victims of abuse and serious violence

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Central Bedfordshire Safeguarding Children Board. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand part 1 of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#) September 2023, and review this guidance at least annually.

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Matthew Chapter 17, Verse 20

All staff will be aware of:

- Our systems which support safeguarding, including the Staff Code of Conduct and the role of the designated safeguarding lead (DSL) and Deputy safeguarding lead (DDSL).

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 or upskirting, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM, Radicalisation, Upskirting and Serious Violence
-

Section 12 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

Our DSL is Kate Searle, Deputy Principal – Quality of Education. The DSL takes lead responsibility for child protection and wider safeguarding. Contact can be made via email to ksearle@asadunstable.org

The DSL and DDSL roles have strategic and operational components. The DSL oversees the strategic direction of safeguarding within the Academy and the DDSLs oversee the operational side of safeguarding. The ultimate lead responsibility lies with the DSL.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of Academy hours, the DSL can be contacted by email. When the DSL is absent, the deputy DSL, Hannah Buckledee, will act as cover. Contact can be made via email to hbuckledee@asadunstable.org

The Academy will make sure all of our students receive the service and support they need and if specialist support is required staff will be relentless in securing the necessary provision.

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

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

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

The Principal and the other two Deputy Principals have also undertaken level 3 Safeguarding Training.

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The Academy also has a pastoral manager – Chris May- who acts as a second Deputy DSL and supports the team through triaging cases ensuring needs are met swiftly. All of the safeguarding team and Heads of Year (teaching and non-teaching) have also undertaken Level 3 safeguarding training.

Role of the designated safeguarding lead

The Governing Body will appoint an appropriate senior member of staff, from the Academy leadership team, who is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder’s job description.

The designated safeguarding lead should have the appropriate status and authority within the Academy and is a member of the senior leadership team. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy designated safeguarding leads

Any deputies will be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the Designated Safeguarding Lead, this lead responsibility should not be delegated. The Deputy DSL is Hannah Buckledee who can be contacted by email at hbuckledee@asadunstable.org. Other members of the safeguarding team can also be contacted such as Chris May – Pastoral Support Lead / Deputy DSL (cmay@asadunstable.org) and Nicola Norton –the Mental Health Lead and Counsellor (nnorton@asadunstable.org)

The DSL and DDSLs have attended training specifically for their roles in the last two years.

All staff have also undergone the following training:

- KCSIE – September 2022
- NSPCC Safeguarding of SEND Students – October 2022
- Local Authority Prevent Training – April 2022
- KCSiE –September 2023
- NSPCC Harmful Sexual Behaviours (HSB) –September 2023

The DSL has attended training on the Prevent Duty and other specific needs. In addition to formal training the DSL and DDSLs regularly refresh their knowledge at least annually through e-bulletins or meetings with other DSLs.

Availability

During term time the designated safeguarding lead will always be available (during school hours) for staff in the Academy to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what “available” means and whether in exceptional circumstances availability via phone and/or Skype or other such media is acceptable. The Academy and the designated

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Matthew Chapter 17, Verse 20

safeguarding lead will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The designated safeguarding lead or Deputies will refer cases:

- Of suspected abuse and neglect to the local authority children’s social care as required and support staff who make referrals to local authority children’s social care;
- To the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- Where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Where a crime may have been committed to the Police as required. **NPCC - When to call the police** should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead and Deputies will:

- Act as a source of support, advice and expertise for all staff;
- Act as a point of contact with the safeguarding partners;
- Liaise with the Executive Principal to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.
- As required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co-ordinators (SENCOs), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- Work with the Executive Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at the Academy.

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- This includes:
 - Ensure that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and
 - Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with the guidance on information sharing.

Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child’s safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The designated safeguarding lead and Deputies will:

- Ensure each member of staff has access to, and understands, the school’s safeguarding and child protection policy and procedures, especially new and part-time staff;
- Ensure the school’s safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;

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- Ensure the safeguarding and child protection policy is available publicly and parents/carers know that referrals about suspected abuse or neglect may be made and the role of the school in this;
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children’s social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children;
- Understand the lasting impact that adversity and trauma can have, including on children’s behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- Understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners;
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and

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- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, the DSL’s and DDSL’s knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

The DSL and DDSLs also have responsibility to ensure that all staff receive appropriate safeguarding training and updates at least annually. This includes training staff who miss the annual training or join part way through the school year. The HR manager will liaise with the DSL and DDSL to ensure new starters have safeguarding training before they meet with any students.

Providing support to staff

Responding to concerns about child protection can be upsetting. The DSL and DDSL will act as a source of advice and support to other staff. The DSL and DDSL will signpost staff to external support. Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- Ensure that staff are supported during the referrals processes; and
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The designated safeguarding lead should be equipped to:

- Understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- Be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Multi-agency Working and Safeguarding Partners:

Children’s Services – Concerned about a child or young person? Tel: 0300 300 8585 (office hours). For out of hour’s reports call 0300 300 8123 Email: cs.accessandreferral@centralbedfordshire.gov.uk

Early Help Team – Universal and targeted services designed to reduce or prevent specific problems from escalating or becoming entrenched Tel: 0300 300 8585 Email: earlyhelp@centralbedfordshire.gov.uk

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LADO - Concerned about the conduct and behaviour of someone working with children and young people?
Tel: 0300 300 8142

Police – Emergency Tel: 999 or Non-Emergency Tel: 101 or Online Webchat service – Email: Contact Us page at www.beds.police.uk

Advocacy (A voice for young people) – Request an advocate for a child or young person - Tel: 0300 300 8787
Email: advocacy@centralbedfordshire.gov.uk

Child Exploitation Online Protection Centre (CEOP) - Contact information: Email: www.ceop.police.uk/ceopreporting or by calling 101.

NSPCC helpline – Concerned about a child’s safety or well-being? Tel: 0800 800 5000 (10am – 4pm) Email: help@nspcc.org.uk

NSPCC whistleblowing – Free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation. Tel: 0800 028 0285 Email: help@nspcc.org.uk

Childline – Tel: 0800 1111 Contact information: www.childline.org.uk Get Support page.

The Mix (Support for Under 25’s) - Tel: 0800 808 4994 Advice and contact information: www.themix.org.uk

Channel/Prevent - Prevent Officers support people vulnerable to radicalisation and help them move away from extremism. Prevent advice line Tel: 0800 011 3764 Email: Prevent@Bedfordshire.pnn.police.uk or contact Central Bedfordshire Children’s Services on Tel: 0300 300 8585 for advice.

5.3 The governing board

The governing board holds the overall responsibility for safeguarding within the Academy and will approve this policy at each review, holding the Principal to account for its implementation. The DSL and DDSs will be responsible for ensuring all members of staff and volunteers are made aware of the policy. The DSL and DDSs will work with the Governing body and Principal to ensure the policy is implemented. The Governing board will ensure all governors receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The governing board will appoint a Safeguarding Link Governor to monitor the effectiveness of this policy in conjunction with the full governing board. The Link Governor is Luke Geoghegan who meets with the Deputy Principal, and the Deputy Safeguarding Lead, once a term to discuss safeguarding. Contact can be made via email to lgeoghegan@asadunstable.org. This is always a different person from the DSL. The chair of governors will act as the ‘case manager’ in the event that an allegation of abuse is made against the Principal, where appropriate (see appendix 3).

The Leadership and Management committee will have safeguarding as a standing agenda item at their monthly meetings, and will review the trends and severity of cases that have been recorded on CPOMS. Governors will challenge the identification and accuracy of reporting safeguarding incidents to ensure the Academy has robust systems in place.

It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school their child is going to be interacting with online. Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the governing body will do all that they reasonably can to limit children’s exposure to online risks from the Academy’s IT system. As part of this process, the governing body will ensure the Academy has appropriate filtering and monitoring systems in

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place and regularly review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The governing body will consider the age range of our students, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

5.4 The Principal

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

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL and Deputy DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL and Deputy DSL are 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).

6. Confidentiality

All staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals. This forms a central part of our annual Safeguarding Training and induction for new staff.

- Timely information sharing is essential for effective safeguarding
- Information must be shared on a ‘need-to-know’ basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child’s best interests
- Confidentiality is also addressed in this policy with respect to record-keeping in section 11, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

The Academy recognises that even if there are no reports of peer-on-peer abuse it does not mean it is not happening. Staff will assume all types of abuse are happening and ensure staff and students are educated in recognising and reporting such incidents. Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

7.1 If a child is in immediate danger

Make a referral to children’s social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.** Tell the DSL and Deputy DSL (see section 5.2) as soon as possible

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Matthew Chapter 17, Verse 20

if you make a referral directly. Designated safeguarding lead or staff make a referral to Children’s Social Care call 0300 300 8585 or through the website <https://www.gov.uk/report-child-abuse-to-local-council>

7.2 Responding to non-recent (historic) concerns

Where an adult makes an allegation to the Academy that they were abused as a child, the individual should be advised to report to the police. Non-recent allegations made by a child should be reported to the LADO in line with the local authority’s procedures for dealing with non-recent allegations. The LADO will coordinate with local authority children’s social care and the police. Abuse can be reported no matter how long ago it happened.

7.3 If a child makes a disclosure to you

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

- Be aware that some children may not always feel ready or know how to tell someone they are being abused, so considered support should be given.
- 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
- Record the write-up on CPOMS and alert the DSL and/or Deputy DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL and/or Deputy DSL as soon as possible that you have done so

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

The Department for Education’s Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

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

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

Any member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally and also speak to the DSL and Deputy DSL and follow our local safeguarding procedures.

This is a statutory duty, and members of staff will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

<http://nationalfgmcentre.org.uk>

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

Figure 1 illustrates the procedure to follow if you have concerns about a child’s welfare and the child is not in immediate danger.

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

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

Multi-Agency working

Under the new legislation there will be 3 safeguarding partners who must make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. This replaces the role of the LSCB. As a school we will need to be fully engaged with the new safeguarding arrangements.

Early help

If early help is appropriate, the DSL and Deputy DSLs will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate. The DSL will keep the case under constant review and the school will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

Internal:

The Academy uses the CPOMS referral system and all staff are provided with training on how to make referrals. The following categories are included in the system but each also has its own sub-categories. For example, the new recommendation of ‘child- on-child abuse’ is in the bullying section:

Accidents	LAC
Alternative Provision	Medical
Attendance	Meeting Notes
Behaviour	Parental Concern
Bullying	Pastoral Care Concern
Child Protection	Physical restraint
Hardship	RELAY
Inclusion Unit	Safeguarding
Information Sharing	SEND

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External:

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

As much information as possible should be included in the referral to help social care assessments consider contexts outside the home and enable a contextual approach.

If you make a referral directly (see section 7.1), you must tell the DSL and Deputy DSL as soon as possible.

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

If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child’s situation improves.

7.5 If you have concerns about extremism

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

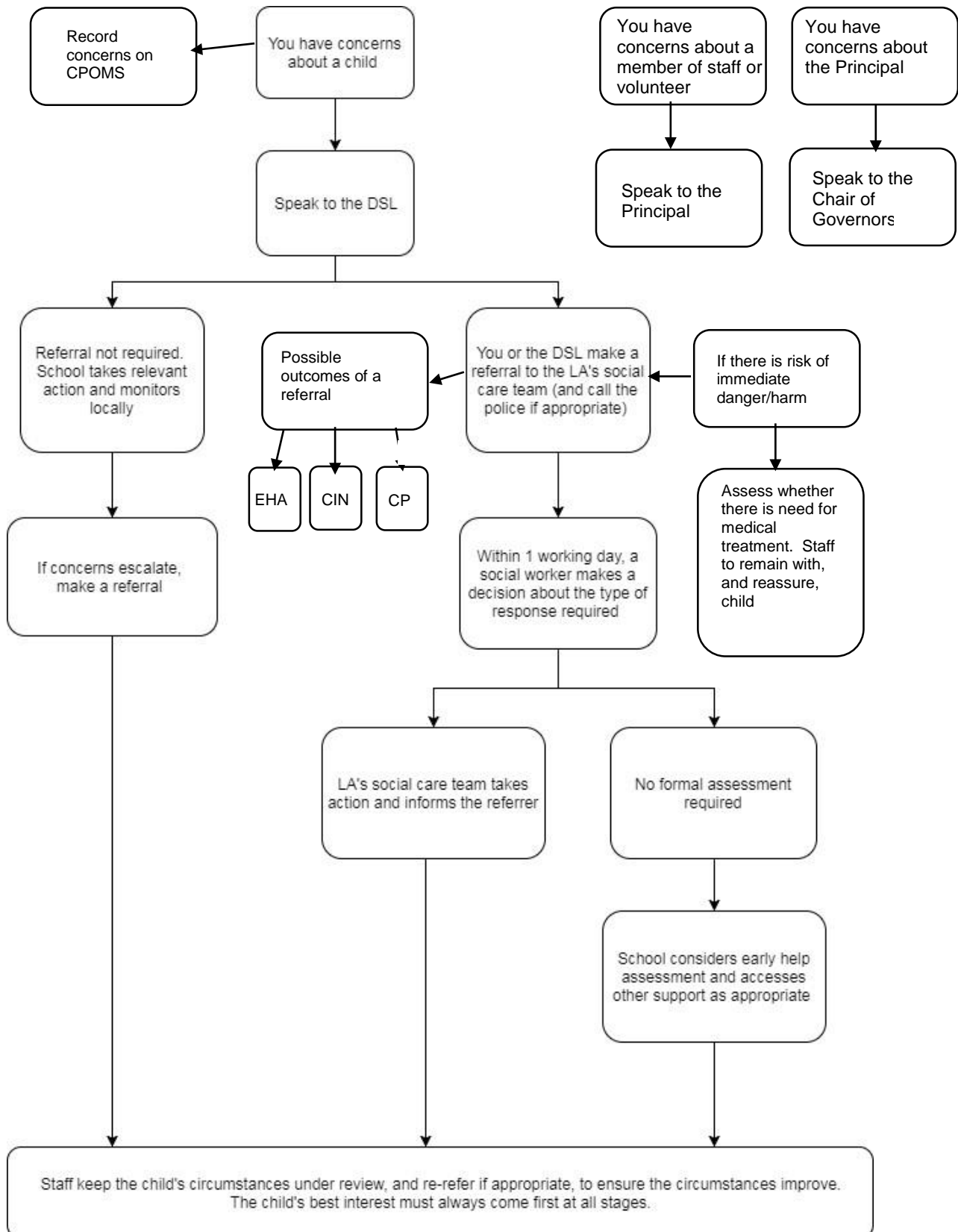
In an emergency, call 999 or the Children’s Services Referral Hub 0300 300 8585 if you:

- 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

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



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7.6 Concerns about a staff member or volunteer

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

The principal/chair of governors/DSL/Deputy DSL will then follow the procedures set out in appendix 3, if appropriate.

If you are not satisfied with the response to your concern then you can use the Academy [Whistleblowing Policy](#) to register your concerns.

You can also call the NSPCC for support on 0808 800 5000.

7.7 Child-on-Child abuse - Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up”. All cases of pupils hurting other pupils, either verbally or physically, are added to CPOMs and then dealt with by the most appropriate member of staff. Some of these are 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 pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse, sexual violence and sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos, including sexting If a pupil makes an allegation of abuse against another pupil:

All staff must understand the importance of challenging inappropriate behaviour between peers

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

Responding to the report

- Staff understand that children may not find it easy to tell staff about their abuse verbally. If staff have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told.
- All victims will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously.
- Staff will ensure a victim will never be made to feel ashamed for making a report.

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- Where possible a report will be recorded with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy)
- The reporting process will be carefully managed and staff need to ensure they do not view or forward illegal images of a child. Sometimes viewing an image is unavoidable and therefore in some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection
- Staff will not promise any confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or a deputy) or local authority children’s social care) to discuss next steps.
- Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to
- It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child
- Staff should keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation and should be listened to carefully. The adult should reflect back, using the child’s language, being non-judgemental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.
- It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by local authority children’s social care and/or part of a criminal investigation, and the designated safeguarding lead should be informed, as soon as practically possible.
- Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.
- Advice should be sought from the designated safeguarding lead (or a deputy), who should consider the following:

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- parents or carers should normally be informed as confidentiality is not a barrier to sharing safeguarding information (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children’s social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.
- If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children’s social care and/or a report to the police against the victim’s wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered. Further guidance, if needed, can be sought from the NSPCC helpline.
- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. As a matter of effective safeguarding practice, schools and colleges should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.
- The school should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims’ identities.
- Risk assessment -When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.
- The risk and needs assessment for a report of sexual violence should consider:
 - the victim, especially their protection and support
 - whether there may have been other victims
 - the alleged perpetrator(s)
 - all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
 - the time and location of the incident, and any action required to make the location safer.
- Risk assessments should be recorded (paper or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect
- The designated safeguarding lead (or a deputy) should ensure they are engaging with local authority children’s social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. A referral may result in the child being designated a Child in Need or Early Help.

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- The DSL or DDSL will feedback to the member of staff reporting the concern if it is appropriate to do so. The reporting member of staff should not automatically expect to be kept informed as once the matter is passed to the DSL/DDSL the process may become complex.
- When working in partnership with other schools or at other venues on day or residential school visits and work experience the safeguarding procedures of that institution will be followed and any link backs to the Academy safeguarding procedure will be followed too. Risk assessments will be produced for any external visits which will include considering the institutions own safeguarding policy.
- If the response from children’s social care or the police is unsatisfactory the DSL will, in consultation with the Principal, escalate the concern to the LADO

We will minimise the risk of child on child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by providing access to a confidential email address nobullying@asadunstable.org and by providing access to the Student Services area on request.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy Students have access to the Thrive app on their iPads

7.8 Child Criminal Exploitation

Criminal exploitation of children and vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines activity. It is a harm which is relatively little known about or recognised by those best placed to spot its potential victims.

County lines is a major, cross-cutting issue involving:

drugs violence
gangs
safeguarding
criminal and sexual exploitation
modern slavery missing
persons

The following are risk factors that indicate a young person may be at risk of becoming involved in serious violent crime:

1. having prior experience of neglect, physical and/or sexual abuse
2. lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
3. social isolation or social difficulties

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4. economic vulnerability
5. homelessness or insecure accommodation status
6. connections with other people involved in gangs
7. having a physical or learning disability
8. having mental health or substance misuse issues
9. being in care (particularly those in residential care and those with interrupted care histories)
10. being excluded from mainstream education, in particular attending a Pupil Referral Unit
11. If concerned that a student may be at risk of becoming involved in county lines exploitation you should follow the usual safeguarding guidance and share this information with the DSL and Local Authority Social Services. If you believe they are at immediate risk of harm you should contact the police.

8. Notifying parents/carers

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

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

If we believe that notifying the parents/carers would increase the risk to the child, we will discuss this with the local authority children’s social care team before doing so. The safety and welfare of children is paramount. It is clear that it is preferable to seek permission to share information but at times it is appropriate to share without permission. The DSL/DDSL is responsible in making decisions and the rationale for sharing information without consent should be clear. The seven golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

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6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely
7. The DSL/DDSL should keep a record of their decision and the reasons for it – whether it is to share information or not. If they decide to share, then record what you have shared, with whom and for what purpose

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

The Academy now holds at least 2 different contact telephone numbers for every student.

9. Mobile phones, iPads and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to noncontact time when pupils are not present. Staff members’ personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras. We will follow the General Data Protection Regulation when taking and storing photos and recordings for use in the school. Making and using images of pupils will require the age appropriate consent of the individual or their parents/carers. Images should not be displayed on websites, in publications or in a public place without such consent.

On-line safety is addressed in house assemblies with all students. Students are allowed to bring their mobile phones to school but they MUST be placed in a Yondr pouch at the beginning of the school day and they are not permitted to use them during the school day. Procedures are in place to ensure the safe use of iPads in lessons and around the school site. Appropriate filters and monitoring systems are in place. All parents/carers have signed an iPad agreement prior to the device being issued to students.

10. Complaints and concerns about school safeguarding practices

10.1 Complaints against staff

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

10.2 Other complaints

All Staff and volunteers should be able to raise concerns about poor or unsafe practice and potential failures in the school’s safeguarding regime.

10.3 Whistle-blowing

If staff members have concerns about another member of staff this should be referred to the Principal. Where there are concerns about the Principal this should be referred to the Chair of Governors. If it is alleged that a member of staff have:

Behaved in a way that has harmed or may have harmed a child

Possibly committed a criminal offence against or related to a child

Behaved towards a child that may indicate they would pose a risk of harm

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The Principal would speak to staff involved and contact LADO. Contact can be made via email at LADO@centralbedfordshire.gov.uk. A named person should be provided to support anyone facing an allegation. The complaint must be dealt with quickly and in a fair and consistent way.

11. Record-keeping

All safeguarding concerns, discussions, decisions made, the reasons for those decisions, actions and outcomes must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL and Deputy 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. Both electronic and paper records are kept. Paper records are kept in locked cupboards in Student Services and electronic records are stored on CPOMS, and are retained for 6 years apart from records for CP cases which are kept until the student is age 25. These records will only be shared with Professionals on a “need to know” basis. Retention periods are in line with DfE guidance.

All safeguarding incidents are recorded and managed in CPOMS, a safeguarding and child protection management system for schools: Electronic records are stored on CPOMS <https://allsaintsdunstable.cpoms.net>. Working alongside The Academy’s existing safeguarding processes, CPOMS is an intuitive system which helps to ensure that children, young people and adults are safe and fully supported.

All staff have been granted access to CPOMS and you must complete a registration process before you can use CPOMS to record safeguarding incidents. Concerns should be recorded on CPOMS as soon as reasonably possible. Every staff member has a responsibility to do this and if the child is in danger then the DSL/DDSL should be sought for a verbal conversation to ensure support is offered immediately.

Only information relevant to the purpose should be shared with those who need it, information should be adequate, accurate and up to date, it must be made clear what is fact and opinion. Records should use the child’s own words, wherever possible, in cases where a disclosure is made. Professional opinion can be given, but needs to be supported by stating the facts and observations upon which the opinions are based. Information should be shared in a timely manner. In an emergency situation it may not be appropriate to seek consent to share information, delays could harm a child. When recording the member of staff should clearly distinguish between hearsay, fact and whether an opinion is being offered. If opinions are expressed they should be relevant to the situation, respectful and appropriate in tone.

It is important to make it clear to pupils that any disclosure they make will be treated sensitively, but may need to be shared with other professionals if it is considered necessary to protect the child or someone else from harm.

Sharing information is an intrinsic part of any frontline practitioners’ job when working with children and young people. The decisions about how much information to share, with whom and when, can have a profound impact on individuals’ lives’ (Information Sharing, HM Government: 2018). It is important that practitioner should understand the circumstances under which information may be lawfully shared and how should be data managed and therefore must follow the latest statutory guidance.

The security of personal information is taken very seriously and adequate measures are set out to protect information. Secure storage is used for hard copy files and computer equipment is encrypted and passwords used. Transmission of information is secured through using

- AnyComms
- Bit Locker Encryptions

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- EMP HR information
- Zip files with passwords
- SFTP

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Quality Assurance

- To ensure no safeguarding incidents are overlooked the Academy has a rigorous checking procedure. All staff will record any child-on-child incidents of physical or verbal abuse on CPOMS.
- At the end of every day the behaviour record will be examined by the Heads of Year, for their year group. These key staff members will ensure that any safeguarding issues within their teams have been correctly recorded on CPOMS.
- The Deputy Principals will also run a check daily to ensure that any safeguarding issues have been recorded on CPOMS. The Principal will then check daily to ensure that safeguarding incidents of a low, medium and high level have been recorded accurately.

12. Training

12.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, to ensure they understand the school’s safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board.

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, ebulletins and staff meetings) as required, but at least annually. In 22-23 this included child-on-child abuse, sexual violence and harassment and the reporting of indecent images. In 23-24 these will be re-visited during INSET days.

Volunteers will receive appropriate training, if applicable. They will be accompanied at all times if they do not have evidence of their up to date DBS certificate.

Visitors to school, be they working with students or around the academy, will need to show evidence of their DBS certificate. In some cases this may be provided by the organisation for whom they work.

12.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at every year. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through ebulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

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12.3 Governors

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

The latest update in KCSIE and refers to clarity of process concerning governors and section 128 checks.

12.4 Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education (DfE2021), and be in line with local safeguarding procedures.

12.5 Staff who have contact with pupils and families

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

12.6 Use of school or college premises for non-school/college activities

When hiring or renting out the Academy facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the Academy, under the direct supervision or management of their school or college staff, our arrangements for child protection will apply.

However, where services or activities are provided separately by another body this is not necessarily the case. The governing body will therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the Academy on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college.

The governing body will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place

13. Monitoring arrangements

This policy will be reviewed at least **annually** by the DSL and Deputy DSLs, and the Principal. At every review, it will be approved by the full governing board. If there are significant changes in legislation or guidance the policy will be reviewed mid-year.

14. Links with other policies

This policy links to the following policies and procedures:

- Behaviour

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- Staff Code of Conduct
- Complaints
- Health and safety
- Attendance
- safety
- Sex and relationship education
- First aid
- Curriculum
- GDPR
- RSE
- Quality of Education (Online Safety)

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

Appendix 1: types of abuse

All staff should be able to reassure victims of abuse that they are being taken seriously and will be supported. Children should never be made to feel ashamed or that they are creating a problem by reporting the abuse, sexual violence or sexual harassment.

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.

As a school we are aware that any children subjected to harassment, violence and/or abuse, may breach children’s rights, as set out in the Human Rights Act.

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.

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Matthew Chapter 17, Verse 20

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

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

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

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

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. In addition, as part of our shortlisting process we will carry out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview.

Appointing 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
- 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.

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

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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 the ‘harm test’ is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If 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 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.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

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- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

Governors

All governors 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 of trustees will have their DBS check countersigned by the secretary of state. All trustees, proprietors and local governors will have the following checks:

- Section 128 direction – further clarity provided in KCSIE 2020
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

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

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

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Appendix 3a: allegations of abuse made against staff that do meet the threshold for harm

This section of this policy applies to all cases in which it is alleged that a current member of staff 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 would pose a risk of harm to 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

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/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

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)

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal (or chair of governors where the Principal is the subject of the allegation) – the ‘case manager’ – will take the following steps:

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- 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)
- If the member of staff is with a young person in need of immediate medical attention or protection the case manager will ascertain whether the care of the young person can be passed to another staff member if it has been deemed that immediate intervention is necessary. If this is not possible the case manager will monitor the interaction between the staff member and student to ensure neither party are put at further risk.
- There are three possible areas of investigation that might be needed when concerns arise. They are police investigations, statutory child protection investigations, and internal disciplinary investigations conducted by the Academy.
- 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 consider 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

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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 National College for Teaching and Leadership.

Where the police are involved, wherever possible the governing body 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. **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 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 NCTL 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 Principal, or other appropriate person in the case of an allegation against the Principal, will consider whether any disciplinary action is appropriate

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against the pupil(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 pupil.

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. We will retain these 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

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- 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

Appendix 3b: allegations of abuse made against staff that do not meet the threshold for harm (Low-Level Concerns)

Aims

The Academy will ensure that any low-level concerns about staff contain a procedure for sharing confidentially such concerns which is clear, easy to understand and implement. Whether all low-level concerns are shared initially with our DSL/DDSL or with the principal is a matter for the Academy to decide. All staff will inform the principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern –this also applies to a low-level concern with the DSL or DDSL.

The principal will be the ultimate decision maker in respect of all low-level concerns regarding staff, although it is recognised that depending on the nature of some low-level concerns the principal may consult with the DSL/DDSL and take a more collaborative decision making approach.

Low-level concerns about supply staff and contractors will lead to their employers being notified, so that any potential patterns of inappropriate behaviour can be identified. If the academy is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

The Academy will ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Recording low-level concerns

All low-level concerns will be recorded by the Principal in writing in a table as shown below. The record will include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

These records are kept, but they must be kept confidentially, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the academy should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low level concern to meeting the harm threshold, in which case it should be referred to the LADO.

Referral to the LADO will occur where it is alleged that anyone working in the Academy that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

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

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The academy will record any lessons learned from the event and give consideration to whether there are wider cultural issues within the Academy that enabled the behaviour to occur. The academy may revise the appropriate policies, or provide extra training to minimise the risk of it happening again.

The information will be retained until 6 years after the individual leaves the academy employment.

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

Allegation Outcomes

The definitions that should be used when the academy determines the outcome of an allegation are set out below:

- *Substantiated*: there is sufficient evidence to prove the allegation
- *Malicious*: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- *False*: there is sufficient evidence to disprove the allegation
- *Unsubstantiated*: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence, or
- *Unfounded*: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Member of Staff Reporting	Date	Member of Staff Involved	Context of concern	Action taken	Lessons Learned

Organisations or Individuals using school premises

We may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we will follow our safeguarding policies and procedures, including informing the LADO

Appendix 4: specific safeguarding issues 12. Children missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care □ Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families
- Are at greater risk of CSE/CCE/County lines exploitation

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

13. Child sexual exploitation/Child Criminal Exploitation/County Lines

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. Child Criminal Exploitation (CCE) is a form of abuse where children who are trafficked, exploited or coerced into committing crimes are victims in need of safeguarding and support. Though perceptions are altering these young people are still often criminalised and perceived as having 'made a choice' to take part in illegal activity. Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks groom and exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually or criminally 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.

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

Indicators of sexual/criminal/county lines exploitation can include a child:

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

14. FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from 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

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

- The girl’s family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl’s community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers 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.

15. Forced marriage

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

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

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

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages

The DSL will:

- Speak to the pupil about the concerns in a secure and private place

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- 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 fmufco.gov.uk.
- Multi-agency practice principles - for responding to child exploitation and extra-familial harm – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

16. Preventing radicalisation

Prevent duty guidance

The governing board will use the questions published by UKCIS on Online safety in schools to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

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

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

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

Staff will be alert to changes in pupils’ behaviour.

The government website [Educate Against Hate](https://www.gov.uk/government/collections/educate-against-hate) and charity [NSPCC](https://www.nspcc.org.uk) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others

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- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff should **always** take action if they are worried.

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

17. Checking the identity and suitability of visitors

- All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.
- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
- Visitors are expected to sign the visitors’ book and wear a visitor’s badge.
- All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

18. Recognising incidents of Upskirting

Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person’s clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).

The new law will capture instances where the purpose of the behaviour is to obtain sexual gratification, or to cause humiliation, distress or alarm. Anyone, and any gender, can be a victim.

19. Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will send an email to all staff to ascertain if the student is within the Academy building. A text message will be sent to the parent/carer if the child is not located within 30 minutes. A phone call will also be made to the parent/carer to reassure them that actions are in place to locate their child. If we are unable to make contact with the parent/carer by text or phone a home visit will be made. If we are unable to locate the student, police will be informed.

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For students who are absent from the Academy for a significant number of days, every attempt will be made to contact the family but a referral will be made to CME/Children’s Services after 10 Academy days have been missed.

20. Relationship Education

Relationships and Sex Education is now compulsory in all secondary schools

Health Education is now compulsory in all state-funded secondary schools

21. Domestic Abuse

Living in a home where domestic abuse happens can have a serious impact on a child or young person’s mental and physical wellbeing, as well as their behaviour. And this can last into adulthood.

Domestic abuse can be psychological, physical, sexual, financial, or emotional. It can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

Children who witness domestic violence are more likely to get in trouble at school and have behavioural problems, including being aggressive and bullying their classmates.

Brett Welch says she understands why: School is "where they can feel powerful because they are completely powerless at home." All incidents of Domestic are recorded on CPOMS and shared with the relevant staff.

Operation Encompass (formerly Relay)

At All Saints Academy, we are working in partnership with Central Bedfordshire Council and Bedfordshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass.

The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead or deputy) in school before the child or children arrive at school the following day.

This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children’s social care if they are concerned about a child’s welfare.

All Saints Academy has an information sharing agreement in place with Bedfordshire Police for Operation Encompass.

22. Mental Health

The mental health of all students is vitally important if we want them to succeed at school. RSE covers topics about mental health and well-being as outlined in the most recent government update and stresses the link between this and physical health. The new school council will also be talking about how we might improve the well-being of students in the school and how we might put supporting strategies in place.

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Children requiring mental health support

We recognise that the Academy has an important role to play in supporting the mental health and wellbeing of our pupils. 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. The Academy staff know how to refer a student to the DSL/DDSL to identify possible mental health problems.

The Academy has nominated our school counsellor to become the mental health lead and they will work alongside all staff.

Within our Character Education and Collective Worship programmes we promote positive health, wellbeing and resilience among our students. The RSE curriculum is embedded within the structure of the Academy week and will cover topics such as social media, forming positive relationships, smoking and alcohol. The links to the RSE curriculum can be found in appendix 5.

23. Child on Child abuse

If staff have any concerns about child on child abuse, they should speak to the DSL or deputy DSL. Staff should recognise that downplaying certain behaviours can lead to a culture of unacceptable behaviour, an unsafe environment and a culture that normalises abuse.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and semi nudes images and/or videos (Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

24. Children with additional needs

We recognise that while all children have a right to be safe, some children may be more vulnerable to abuse, for example a young carer, a child frequently missing from home/care, children with disabilities or special educational needs, a child living with domestic abuse, parental mental ill health or substance abuse, or a child who has returned home to their family from care.

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We recognise that additional barriers can exist when recognising abuse and neglect in children with special educational needs or disabilities, medical or physical health conditions.

- These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s condition without further exploration;
 - these children being more prone to peer group isolation or bullying (including prejudice based bullying) than other children;
 - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
 - communication barriers and difficulties in managing or reporting these challenges
 - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so
- Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND.
- All Saints Academy will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.
- If we are considering excluding, either fixed term or permanently, a vulnerable child and/or a child who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude.
- Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we work together with Local Authority and other key professionals to coordinate a meeting with parents/carers where possible. We will do this before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.
- In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the Governing Body.

Further information can be found in the department’s:

- SEND Code of Practice 0 to 25 years, and Supporting Pupils at School with Medical Conditions.

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledchildren.org.uk)
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

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25. Children who are Lesbian, Gay, Bi, Trans or Queer/Questioning (LGBTQ+)

At All Saints Academy we recognise that whilst the fact that a child or a young person may be LGBTQ is not in itself an inherent risk factor for harm, children who are LGBTQ can be targeted by other children.

A child who is perceived by other children to be LGBTQ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ.

We will endeavour to reduce barriers faced by children who are LGBTQ and will provide a safe space for them to speak out or share their concerns with members of staff in student support.

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Appendix 5

There are numerous links to safeguarding linked to the RSE curriculum:

- How information and data is generated, collected, shared and used online. This includes impact on future employment
- Exploration of acceptable and unacceptable behaviours on-line with reference to cyber bullying and indecent images
- Sexting and sharing of inappropriate images on mobile phones
- Awareness of on-line grooming
- Understanding why stable relationships are important for raising children and the impact of poor parenting on a child’s happiness
- How parents and peers can influence prejudice
- Exploring friendships: the characteristics of healthy friendships and unhealthy with reference to trust, respect
- Criminal behaviour in relationships, including domestic abuse, stalking, harassment and coercive control
- Recognising consent
- How alcohol and drugs can lead to inappropriate sexual behaviour
- General sexual health and the importance of contraception
- The impact of sexual violence and sexual harassment on lives
- Exploration of unhealthy behaviours in a relationship to promote awareness
- What is bullying and how we recognise it
- Introduction to the equality act and protected characteristics
- Rights and responsibilities in terms of human rights and what happens if these are absent from society
- How employers ensure that the equality act is adhered to during recruitment and processes

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Appendix 6: Remote education

Guidance to support schools and colleges understand how to help keep pupils, students and staff safe whilst learning remotely can be found at Safeguarding and remote education - GOV.UK (www.gov.uk) and Providing remote education: guidance for schools - GOV.UK (www.gov.uk). The NSPCC also provide helpful advice – Undertaking remote teaching safely.

If the need for remote education should arise the academy will be in regular contact with parents and carers. We will reinforce the importance of children being safe online, and parents and carers will be clear about the systems that the academy uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear which members of staff from the academy their child is going to be interacting with online.

Filtering and monitoring

The Governing Body will consider their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, and will be doing all that they reasonably can to limit children’s exposure to the risks from the academy’s IT system. As part of this process, the governing body will ensure the academy has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The governing body will consider the age range of their children, the number of children, how often they access the IT system, those who are potentially at greater risk of harm and the proportionality of costs versus safeguarding risks. The appropriateness of any filtering and monitoring systems will be informed in part, by the risk assessment required by the Prevent Duty.

The IT Network Manager has overall responsibility for managing the filtering and monitoring of systems. This will be reviewed at least annually with the Governing Body to discuss what more needs to be done to meet the government standards. The purpose of these systems is to block harmful and inappropriate content without unreasonably impacting teaching and learning

The Academy firewall provider (Sophos), the web filter (Content Keeper) and our classroom monitor (Impero) are all compliant with these and are all signed up on the Government sites as meeting the criteria.

Our filtering and monitoring complies with the requirements listed on [Meeting digital and technology standards in schools and colleges - Broadband internet standards for schools and colleges - Guidance - GOV.UK \(\[www.gov.uk\]\(http://www.gov.uk\)\)](#)

Using the links in the technical requirements section we monitor and record all of the categories mentioned and more.

Our filter supplier (Content Keeper) is also registered with all the relevant authorities mentioned. Additional guidance on filtering and monitoring can be found at: UK Safer Internet Centre: “appropriate” filtering and monitoring. <https://www.saferinternet.org.uk/advicecentre/teachers-and-school-staff/appropriate-filtering-and-monitoring>. South West Grid for Learning (swgfl.org.uk) have created a tool to check whether a school or college’s filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content)

Members of staff should be vigilant in lessons and at break times. If you catch a student looking at an inappropriate website refer this to the DSL or DDSL. If you are unsure but have suspicions note the time that you suspect the student of looking at a website and ask the IT Network manager to investigate what was being looked at during that time.

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Information security and access management

The academy is directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Guidance on e-security is available from the National Education Network. In addition, broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff - NCSC.GOV.UK. The Governing Body have worked alongside the IT Manager to ensure the Cyber security standards for schools and colleges are being met.

Reviewing online safety

Technology, and risks and harms related to it, evolve, and change rapidly. The academy will carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face.

The academy will use the online safety self-review tool for schools which can be found via the 360 safe website or LGfL online safety audit.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our effective whole academy approach to online safety empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel our pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We will ensure online safety is a running and interrelated theme reflected as required in all relevant policies and considered in online safety whilst planning the curriculum. It features here:

Year 7: What does on-line bullying and how to recognise it (RSE lesson)

The pitfalls of social media (Character Education)

Year 8: How information and data is generated, collected, shared and used online (RSE lesson)

Acceptable and unacceptable behaviours online (RSE lesson)

Online grooming (Character Education)

Year 9: Digital footprint and the impact on future employment. How sharing images can lead to bullying (RSE lesson)

Sexting and sharing of inappropriate images. Risks associated and potential criminal offences (RSE lesson)

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Manipulation of social media and impact (eg body image) (Character Education)

Year 10: Harmful sexual content online eg pornography and the impact (RSE lesson)

Examples of how people have been impacted negatively through social media eg suicide as a result of bullying, prosecution (Character Education)

Year 11: Specific legislation around sharing of indecent images of children. Signs of on-line grooming and how to report it (RSE lesson)

Cyber-crime (Character Education)

Online safety approach

We will consider the 4Cs (above) as the basis of an effective online policy. Our academy policy bans the use of mobile and smart technology as all phones are placed in Yondr pouches on the way into school. This limits the potential to sexually harass, bully, and control others via mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

Sexual Violence and Harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

The Academy is aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

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

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe

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Sexual violence

The Academy is aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school/college. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003¹³³ as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

Sexual harassment

When referring to sexual harassment, we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
 - sexual “jokes” or taunting
 - physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes.
- Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
 - upskirting (this is a criminal offence¹³⁷), and
 - online sexual harassment -It may include: consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges.
- sharing of unwanted explicit content sexualised online bullying
 - unwanted sexual comments and messages, including, on social media

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- sexual exploitation; coercion and threats, and coercing others into sharing images of themselves or performing acts they are not comfortable with online