



The Park Federation Academy Trust

Lake Farm Park Academy

2023-2024

Child Protection and Safeguarding Policy

- **Read in conjunction with: re-link policies**
- **Staff Code of Conduct**
- **Child Protection and Safeguarding Policy and Procedures**
- **Children Looked After and Previously Looked After Policy**
- **Online Safety Policy**
- **Internet and Email Policy**
- **Social Media Policy**
- **Remote Learning Policy**
- **Anti-Bullying Policy**
- **Positive Behaviour Policy**
- **Positive Handling Policy**
- **SEND Policy**
- **Intimate Care Policy**
- **Missing Child Policy**
- **Safe Handover: Children walking Home Alone Policy**
- **Sex and relationships Policy**

- **Evacuation Policy**
- **Lockdown Procedures**
- **Fire Safety Policy**
- **Incident Management : Bomb Warning and Evacuation Procedures**
- **Anti-Modern Slavery Statement**
- **Health and Safety Policy**
- **First Aid Policy**
- **Supporting Children with Medical Conditions Policy**
- **Supporting Children with Asthma Policy**
- **Children with Medical Needs who Cannot Attend School**
- **Managing Allegations Against Staff**
- **Whistleblowing Policy**
- **Wellbeing Policy for Staff**
- **Wellbeing Policy for Pupils**

Approval

Signed by CEO and Federation Principal on behalf of the Board of Directors	Dr. Martin Young
Date of approval	1 st September 2021
Date of next review	August 2024

Version History

Version	Date	Status and Purpose	Changes overview
1	01/09/2021	Final	Policy now in line with KCSIE 2021 changes
2	August 2022	Policy Update	Now in line with KCSIE 2022
3	July 2023	Policy Update	Now in line with KCSIE 2023

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Key Contacts

Role	Name	Contact details
Designated Safeguarding Lead & teacher for LAC	Hayley O'Neill	0208 573 2622 honeillfp@theparkfederation.org
Deputy Designated Safeguarding Lead	Sam Dickerson	0208 573 2622/07756543508 sdickersonlfp@theparkfederation.org
Child Sexual Exploitation Champion (DSL)	Hayley O'Neill	0208 573 2622 honeillfp@theparkfederation.org
Named Safeguarding Governor, also for LAC	Sue Wilson	swilsongov@theparkfederation.org
Local Authority Designated Officer (LADO)	Hannah Ives	07753 431285 hives@hillington.gov.uk
Education Safeguarding Officer Hillingdon Local Authority & Deputy LADO	Nicole Diamond	07943 097366 ndiamond@hillington.gov.uk
Prevent Lead contact for the Local Authority	Fiona Gibbs	fgibbs@hillington.gov.uk
Domestic Abuse Lead &	Laura Clarke	07507 475 797 lclarke@hillington.gov.uk

Advisor for Local Authority		
AXIS & Serious Youth Violence Advisor for Local Authority	Phil Skidmore	01895 277177 axis@hillington.gov.uk

Useful contacts:

Hillingdon Stronger Families Hub	Hillingdon Stronger Families Hub (encompassing Children’s Social Care and the Early Help process) Civic Centre Uxbridge UB8 1UW E-Mail: strongerfamilieshub@hillington.gov.uk https://archive.hillingdon.gov.uk/inter-agency-referral-form Tel: 01895 556006 Fax: 01895 250869 Out of hours – 01895 250111 email: strongerfamilieshub@hillington.gov.uk or dial 999.
Early Help Assessment Hub	01895 556006 New referrals via Stronger Families Hub strongerfamilieshub@hillington.gov.uk
Hillingdon Safeguarding Partnership Board	Hillingdon Safeguarding Children Partnership Arrangements (Hillingdon LSCB) (hillingtonsafeguardingpartnership.org.uk)
NSPCC Whistleblowing Helpline	0800 028 0285 help@nspcc.org.uk
Channel Helpline (Prevent)	0207 340 7264 counter.extremism@education.gov.uk
NSPCC	Useful information on abuse and neglect and what to look for https://www.nspcc.org.uk/ Report abuse in Education Helpline – Everyone’s Invited 0800 136 663 help@nspcc.org.uk
Domestic Abuse National 24 hour helpline	0808 2000 247

Section 1: Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#), [Working Together to Safeguard Children \(2018\)](#), [Behaviour in Schools \(2022\)](#), [Teaching Online Safety in Schools \(2023\)](#), [Meeting Digital and Technology Standards \(2023\)](#) and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- This policy has been written with reference to the Hillingdon Safeguarding Children Procedures. Hillingdon Safeguarding Children Partnership [Hillingdon Safeguarding Children's Partnership](#)
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and persons impacted by the behaviour. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of

harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

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

Section 2: Policy Aims

The Park Federation Academy Trust fully recognises its responsibilities for safeguarding and child protection. Schools and their staff form part of the wider safeguarding system for children. **Safeguarding and promoting the welfare of children is everybody's responsibility.** Everybody who comes into contact with children and their families and carers have a role to play in safeguarding children. Consideration should be given, at all times, to the best interests of the child.

Our policy applies to all staff, Board Directors, Trust Members, Academy Council Governors, outside providers and volunteers who have access to children at Cranford Park Academy (for brevity all the preceding groups, apart from staff, will be referred to in the rest of the policy as **"relevant persons"**).

The policy is to be made available to parents and carers via the website, and in writing if requested.

There are five main elements to our policy:

1. Ensuring we practise safe recruitment in checking of all who work with children and train all in safe procedures and child protection
2. Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
3. Procedures for identifying and reporting cases, or suspected cases, of abuse (including protecting children from radicalization and extreme views, sexual exploitation and forced marriages)
4. Supporting pupils
5. Establishing a safe environment in which children can learn and develop.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes in contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Section 3: Training

1. All staff

All staff members will undertake appropriate safeguarding and child protection training **annually, and those that join the academy in-year, at induction.** In addition to this, staff will also receive regular safeguarding and child protection updates, **which includes updates on online safety. This could be,** for example, through emails, e-bulletins and staff meetings as required. **Training includes a wide range safeguarding issues,** to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners. **Training covers the following:**

- All staff will have annual 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.
- All staff will receive annual training on online safety **and will be informed of the schools web filtering**

and monitoring practices and procedures so that they have an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This will allow them to be fully aware of how the school reduces the risks of online harm and how to report and resolve concerns over online safety.

- All staff will receive annual training on Female Genital Mutilation (FGM) so that they can spot the signs of harm and act swiftly to prevent further risk of abuse. This will also ensure staff know their statutory duties related to reporting concerns of FGM to the police and children's services.
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. Volunteers will receive appropriate training, if applicable.
- Staff will also be made aware of the school's whistleblowing policies and procedures so that they know how to raise concerns regarding safeguarding practice and procedures.

2. The DSL and deputy

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will undertake Prevent awareness training as well as an online module/face to face training with regards to FGM and Online Safety. They will also have an understanding of the school's filtering and monitoring systems and processes in place, which is now detailed within their job descriptions.

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. They will also undertake Prevent awareness training, Online Safety training and an online module with regards to FGM.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

Governors should ensure all staff undergo appropriate safeguarding training, including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, annually, or at induction. The named governor for Safeguarding for Lake Farm Park Academy is **Sue Wilson**.

4. Children

Schools should ensure that children are taught about safeguarding issues such as online safety and safety in the outside world, e.g. water, road and rail safety. This should be done through a broad and balanced curriculum. School should consider teaching this through PSHE lessons as well as the RHE/RSE curriculum, assemblies and where there are appropriate links to the curriculum. External visitors will be invited into schools to discuss relevant issues, e.g. Police, NSPCC and water safety experts. Children will also be listened to and pupil voice will be considered when discussing key issues. To reduce the risk of access to mobile and smart technology on pupils' personal devices, pupils must hand their devices to either the office or their class teacher so that it cannot be used during the school day. This will reduce the ability of some children, whilst at school, to sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

5. Recruitment – interview panels

- At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.
- 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.
- **Social media search – In addition, as part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. Schools and colleges should inform shortlisted candidates that online searches may be done as part of due diligence checks.**

Further advice can be found in the [DfE’s guidance Keeping Children Safe in Education \(September 2023\)](#).

Section 4: Definitions

Safeguarding and promoting the welfare of children means:

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

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

Abuse is a form of maltreatment of a child that may involve inflicting harm or failing to act to prevent harm.

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.

Sharing of Nudes and Semi-Nudes is the sharing of sexual imagery (photos or videos) by children.

Children includes everyone under the age of 18.

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

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

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a person impacted by the behaviour, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with. **At this school we prefer the term person(s) impacted by the behaviour (this is how we will refer to the term previously known as ‘victim’ throughout the policy).**

Alleged perpetrator is a widely used and recognised term. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the

persons who instigated the behaviour too. **At this school we prefer the term person(s) who instigated the behaviour (this is how we will refer to the term previously known as ‘perpetrator’ throughout the policy).**

Section 5: 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 take into account children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9);
- Are young carers;
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- Have English as an additional language;
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- Are asylum seekers;
- Are at risk due to either their own or a family member’s mental health needs;
- Are looked after or previously looked after;
- Are missing from education/**absent from education**
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- **Are at risk due to concerns around their mental health or a family member’s mental health.**

Section 6: Roles and Responsibilities

All schools should have a child-centred and coordinated approach to safeguarding. 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 the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Positive Behaviour policy
- **Staff Code of Conduct**
- **Online Safety Policy**
- Pastoral support system (Wellbeing Team)
- Planned programme of relationships and health education (RHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality

- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

1. All staff

All staff will:

- read and understand **Part 1 and Annex A: Safeguarding information for school & college staff**, of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education \(2023\)](#) and review this guidance at least annually. You can decide whether staff who **don't** work directly with children read part 1 of KCSIE or annex A of KCSIE (a condensed version of part 1), but these staff are expected to read at least either section.
- sign a declaration at the beginning of each academic year to say they have received, read and understood the guidance.
- **sign a declaration at the beginning of each academic year to say they have read and understood the staff code of conduct.**
- reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns. At JEA we would expect children to approach a trusted adult who can signpost them to an appropriate member of the wellbeing team.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies (DDSLs), the positive behaviour policy, Online Safety Policy, and the safeguarding response to children who go missing from education.
- The early help assessment 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. All staff should be aware of the local authority early help referral process and understand their role in it.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation and serious violence (including that linked to county lines).
- The importance of reassuring person impacted by the behaviours that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online

- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection
- The fact that children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, but staff should still have a 'professional curiosity' and should speak to the DSL/DSSL regarding their concerns
- **The school's filtering and monitoring systems and know how to raise concerns if this is breached.**

2. The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is **Hayley O'Neill**. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL can also be contacted out of school hours if necessary by email: honeillfp@theparkfederation.org or by phone on 0208 573 2622.

When the DSL is unavailable or absent, the Deputy Designated Safeguarding Lead (DDSL) – **Sam Dickerson (Pupils & Families Liaison Officer)** will act as cover.

If the DSL and DDSL are not available, **Harshindar Buttar** – Principal will act as cover. The DSL and the DDSLs form the core of the safeguarding team at LFPA but there are also other members of staff within the safeguarding team who can provide support and advice – **Fathia Adams (KS1 VP)**, **Charmaine Golley (LKS2 VP)**, **Karima Peerwani (UKS2 VP)**, **Raji Nair (Office Manager/PA to Principal)** and **Parveen Saini (Welfare Officer)**. Please note that the DSL and DDSL will make all referrals to children's social care in the first instance, unless they have directed another member of the safeguarding team to do so.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Take lead responsibility for safeguarding and child protection. This responsibility should not be delegated.
- Ensure that all staff are aware of these procedures.
- Work closely with the Safeguarding Team.
- Have a good understanding of harmful sexual behaviour
- Ensure that Child Protection concerns or allegations against adults are referred to the Local Authority Designated Officer (LADO), **Hannah Ives** for advice.
- 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 DSL will also:

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

- Be confident that they know what local specialist support is available to support all children involved (including person impacted by the behaviours and alleged persons who instigated the behaviours) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- The full responsibilities of the DSL and deputies are set out in their job description.
- **Have an understanding of the school's web filtering and monitoring practices and procedures and will ensure awareness of these are raised with all staff so that they know what to look out for and how to raise concerns.**

3. The governing board

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- The governing board will approve this policy at each review, ensure it complies with the law and hold the Principal to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- The governing board will appoint a senior board level (or equivalent) lead – **Sue Wilson**, – Chair of Academy Council and link Safeguarding Governor for JEA, to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- **Have an awareness of the risks of online safety and the school's approach to web filtering and monitoring.**

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the **web filtering** and monitoring systems in place, manage them effectively and know how to escalate concerns.
- **Staff are appropriately trained and have a good awareness of online safety and the school's web filtering and monitoring systems in place.**
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The CEO, **Dr Martin Young**, will act as the ‘case manager’ in the event that an allegation of abuse is made against the Principal, where appropriate (see appendix 3).
- All governors will read [Keeping Children Safe in Education \(2023\)](#), Part One & Annex A.

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 our systems which support safeguarding, including this policy, as part of their induction;
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents when their child joins the school and via the school website;
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly;
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3);
- Ensuring the relevant staffing ratios are met, where applicable;
- Making sure each child in the Early Years Foundation Stage is assigned a key person;
- All staff and “relevant persons” feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner;
- Children are taught so as to equip them with the skills they will need to keep them safe.

Digital Leads

The Director of Digital Learning and the Digital Leads are responsible for:

- Staying informed on best practices about using technology safely for teaching and learning.
- Supporting the school's DSL and other digital leaders in implementing best practices for online safety in schools.
- Supporting teachers with resources and teaching materials that explicitly teach online safety behaviours
- Creating or Co-Creating with the school Senior Leadership team, policies or contracts for the safe and appropriate use of technology in schools.
- Supporting parents and the wider school community by disseminating online safety information to support the safe use of technology at home and in school.
- Supporting schools in monitoring online safety environments by conducting audits and providing the next steps for improvement.
- Work with the school IT department to ensure the smooth running of systems and policy's in place for safe use.
- Support the IT department with monitoring the GDPR requirements for external apps, extensions and programs to ensure compliance requirements are being met.

- This list is not intended to be exhaustive. Please see the Digital Strategy Policy (link needed) for further information.

Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker as well as pupils who are looked after, previously looked after and those who are care leavers.

- They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

Section 7: Confidentiality

The school's approach to confidentiality and data protection with respect to safeguarding is in line with all GDPR (General Data Protection Regulations May 2018), Children Act 1989 and Children Act 2004 section 11.

You should note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

If a person impacted by the behaviour asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a person impacted by the behaviour doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the person impacted by the behaviour's wishes against their duty to protect the person impacted by the behaviour and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the person impacted by the behaviour 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
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged persons who instigated the behaviour is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing person impacted by the behaviours' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Section 8: Recognising abuse and taking action

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the Designated Safeguarding Lead (or Deputy Designated Safeguarding Lead).

1. If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

For a full breakdown of the different types of abuse, as well as signs to look out for, please see [KCSIE 2022 pages 10-11, point 26-30](#) as well as [What to do if you are worried a child is being abused \(2015\)](#).

For further, detailed information on when to call the police regarding a safeguarding issue, please read [When to call the police - guidance for schools and colleges \(2020\)](#).

The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children’s social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations. Permanent staff members have access to CPOMs to record concerns but there are also paper referral forms in the school office, and on each year team board, for non-permanent staff members and anyone who has difficulty accessing CPOMs.

The Designated Lead for Safeguarding will confidentially share and discuss information with members of the Safeguarding Team at the academy. The Designated Safeguarding Lead will decide whether the concerns should be referred to Social Care, if a referral has not already been made by the member of staff raising concerns.

If a child protection referral is made to Social Care, the Designated Safeguarding Lead will ensure that a written report of the concerns is sent to the Social Worker dealing with the case within 24 hours (using the inter-agency referral form).

Particular attention will be paid to the attendance and development of any child who has been identified as at risk, or who is subject to a child protection plan. Any absence needs to be investigated immediately.

If a pupil who is subject to a child protection plan changes school, the Designated Safeguarding Lead will immediately inform the Social Worker responsible for the case and transfer the appropriate records to the receiving school or academy.

Tell the DSL as soon as possible if you make a referral directly.

For more information on reporting abuse see, [Reporting child abuse to your local council](#)

2. If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset;
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner;
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it – this should be completed via CPOMs (Child Protection Online Monitoring system), or a paper form if you are unable to access this;
- If in written form, sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so.

If a disclosure happens at the end of the school day, keep the child and alert DSL immediately and send the parent to the office. **Do not** allow a child to go home without a disclosure being investigated by the DSL/DDSL first.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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 (2023) 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 1.

Any teacher who either :

- discovers (either through disclosure by the person impacted by the behaviour or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18**
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

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

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a person impacted by the behaviour of FGM should speak to the DSL and follow our local safeguarding procedures.

- Telephone '101', the non-emergency crime number;
- Discuss with local safeguarding lead and follow normal safeguarding procedures;
- Make a record of your actions/decisions on CPOMS, and write down the Police reference number;
- Update your safeguarding lead

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

The flowchart on page 17 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a DDSL or a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

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

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. Staff will be expected to contribute to assessments, e.g. completing welfare checks and contributing to reports for section 17/47 enquiries.

Levels of need

Tier 1: No additional needs

These are children with no additional needs; all their health and developmental needs will be met by universal services. These are children who consistently receive child focused care giving from their parents or carers. The majority of children living in each local authority area require support from universal services alone.

Tier 2: Early help

These are children with additional needs, who may be vulnerable and showing early signs of abuse and/or neglect; their needs are not clear, not known or not being met. These children may be subject to adult focused care giving. This is the threshold for a multi-agency early help assessment to begin. These are children who require a lead professional for a co-ordinated approach to the provision of additional services such as family support services, parenting programmes and children's centres. These will be provided within universal or targeted services provision and do not include services from children's social care.

Tier 3: Children with complex multiple needs – Child in Need

These children require specialist services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their health and development and/or who are disabled. They may require longer term intervention from specialist services. In some cases these children's needs may be secondary to the adults' needs. This is the threshold for an assessment led by children's social care under Section 17, Children Act 1989 although the assessments and services required may come from a range of provision outside of children's social care.

Tier 4: Children in acute need – Child suffering or are likely to suffer significant harm

This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes. Their needs may not be considered by their parents. This tier also includes Tier 4 health services which are very specialised services in residential, day patient or outpatient settings for children and adolescents with severe and /or complex health problems. This is likely to mean that they may be referred to children's social care under section 20, 47 or 31 of the Children Act 1989. This would also include those children remanded into custody and statutory youth offending services.

For more information regarding the Early Help process as well as statutory assessments can be found in [Working Together to Safeguard Children \(2018\) - Chapter 1](#).

Early help

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

The DSL/DDSL 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.

Issues identified as requiring further support are:

- Childhood Obesity
- Levels of temporary accommodation
- Risk to EAL families due to language barrier causing isolation
- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;

- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.

All these concerns can be raised through the Early Help process, or through referral to other targeted services.

Details can be found at: [Information on Hillingdon Early Help/Stronger Families Hub](#)

If early help is appropriate, support is requested through a Referral through the portal which is one to Hillingdon Children's Services. The case should be kept under constant review and consideration given to a referral to Social Care if the child's situation does not appear to be improving.

Referrals to social care when there is a risk of harm

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

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

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Concerns about a child's welfare should be raised through Hillingdon Children's Social Care: Hillingdon Stronger Families Hub, who can be contacted on:

Hillingdon Stronger Families Hub (encompassing Children's Social Care and the Early Help process)
Civic Centre,
Uxbridge
UB8 1UW

E-Mail: strongerfamilieshub@hillingdon.gov.uk

<https://archive.hillingdon.gov.uk/inter-agency-referral-form>

Tel: 01895 556006

Fax: 01895 250869

Out of hours – 01895 250111 email: strongerfamilieshub@hillingdon.gov.uk or dial 999.

Concerns about a child's welfare that you feel are not being addressed, and requires escalation, should be raised by the resolving Hillingdon Escalation policy. [Escalation-Policy-2021.pdf \(hillingdonsab.org.uk\)](#)

5. If you have concerns about extremism

“All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.” (KCSIE, 2022)

There is an expectation that all staff will undertake Prevent training annually. [Prevent learning module](#)

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. If outside involvement is needed, the DSL can do a referral using the National Referral System which is the system used in Hillingdon for referring concerns around radicalisation and extremism. [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, and the local authority children's social care team may also be involved at this stage.

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

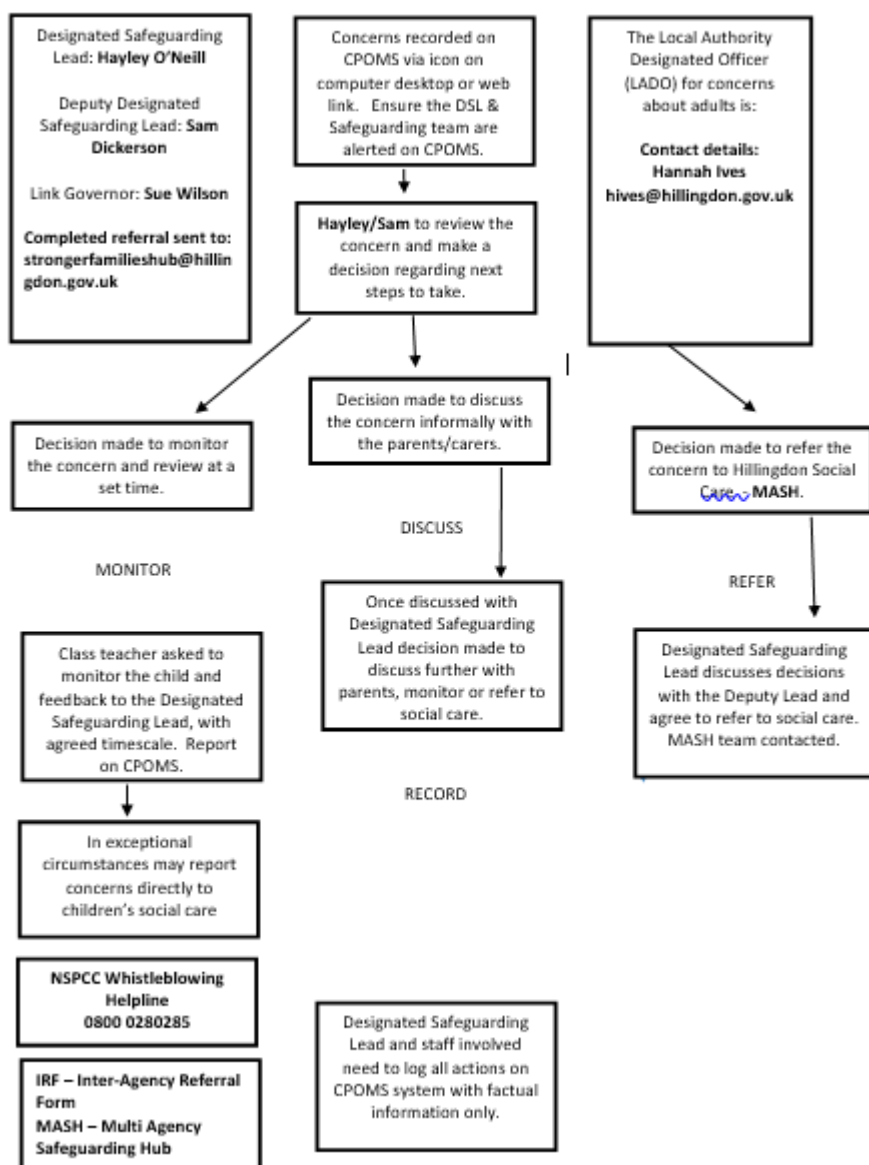
Any member of staff who suspects a pupil is *at risk* of extremist activity or suspects that extremist activity has been carried out must speak to the DSL and follow our local safeguarding procedures.

- Discuss with DSL and follow normal school safeguarding procedures;
- The DSL may telephone '101', the non-emergency crime number for help and advice after speaking to the local Prevent officer.
- Actions/decisions to be recorded on CPOMS, and write down the Police reference number if applicable.

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

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

Please see appendix 1 for detailed information about preventing radicalisation, the Prevent Duty & Channel process, as well as [KCSIE \(2022\) page 147-150](#)



6. Concerns about a staff member or volunteer

If you have concerns about a member of staff, volunteer or supply staff (as well as external professionals who come into school, e.g. SALT, OT, music teachers, sports coaches) or an allegation is made about a member of staff, volunteer or supply staff (as well as external professionals who come into school, e.g. SALT, OT, music teachers, sports coaches) posing a risk of harm to children, speak to the DSL or Principal. If the concerns/allegations are about the Principal, speak to the CEO. The DSL/Principal/CEO will then follow the procedures set out in appendix 3, if appropriate.

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

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary

timescale (see appendix 3 for more detail).

7. Allegations of abuse made against other pupils – Child on Child Abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be person impacted by the behaviours and boys persons who instigated the behaviours). However, all child on child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under [our school’s positive behaviour policy](#) and the [anti-bullying policy](#), but this safeguarding and child protection policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)
- (For more information see appendix 1 Further information about specific safeguarding issues)

If a pupil makes an allegation of abuse against another pupil

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk needs assessment and support plan into place for all children involved (including the person impacted by the behaviour(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged persons who instigated the behaviour. We will ask the police if we have any questions about the investigation.
- We will minimise the risk of child on child abuse by:
- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by regular reminders in class through PSHE, Assemblies and specific targeted workshops
- 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
- For more detail please refer to the Positive Behaviour Policy - [add link](#)

8. Sharing of Nudes and Semi-Nudes

Your responsibilities when responding to an incident

If you are made aware of an incident involving youth produced sexual imagery, you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL;
- Delete the imagery or ask the pupil to delete it;
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers;
- Say or do anything to blame or shame any young people involved;

You **should** explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL. The DSL will then conduct an initial review of the image/footage and decide as to whether or not outside agencies need to be involved.

[Please see Online Safety Policy here for more information on online safety and sharing nudes and semi nudes](#)

Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Your reporting systems for pupils, e.g. what it looks like for pupils in terms of who they should report concerns to
- How you make pupils aware of the reporting systems and processes, e.g. through discussion in your relationships/sex education curriculum
- How pupils will feel safe in submitting any concerns, e.g. reassurances provided following disclosures]

Further review by the DSL

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

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

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

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good

reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through reporting to 101 and informing the local Safer Schools Officer.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our [relationships education / relationships and sex education] and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi nudes:

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

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This guidance on youth produced sexual imagery is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Section 9: Notifying parents

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the person impacted by the behaviour's parents or carers, with the person impacted by the behaviour, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged persons who instigated the behaviour's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the person impacted by the behaviour, and the reason(s) behind any decision(s).

Section 10: Pupils with special educational needs and disabilities

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

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

Staff must be aware of working at a safe and appropriate, professional distance when working with children with SEND and disabilities, in order to safeguard themselves and the child they are working with. See Staff code of conduct – link policy maintaining a professional distance.

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

SENCO support, Emotional Literacy Support Assistants (ELSAs), Pupil and Families Support and HLTAs (pastoral support) Interventions/programmes. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

Please see the [SEN policy](#) for more information.

Use of Positive Handling/Holding Children Safe

There are some circumstances when it is appropriate for trained staff to hold children safely. A child may need to be held safely if they are a risk to themselves or others, or if they are damaging property that could result in themselves or others being harmed. A hold will only be used if it is deemed reasonable, proportionate and necessary and where possible this will be indicated in a child's positive handling plan and/or risk assessment. A positive handling plan and/or risk assessment may be in place to support a child when they are in crisis or at risk of harm. It will highlight the awareness of triggers and promote de-escalation strategies to support the child when in crisis. Therefore, a safe hold will only be practised by trained members of staff as a last resort.

See [Positive Handling Policy](#) for more information and for a list of trained staff.

Section 11: Mobile phones, devices and cameras

Expectations of staff

Staff are allowed to bring their personal phones and devices to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones and devices 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, devices or cameras.

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

No member of staff is permitted to take pictures of pupils on their personal devices.

All photos must be taken on school devices unless permission has been sought from the DSL to use external devices such as Cameras.

Expectations for pupils – handing in devices

Children are expected to hand in their devices to either the school office or class teacher so that access to the internet is limited during school hours; limiting this access means that children will be unable to sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

Children are not permitted to wear/bring smart watches where cameras could be used to take pictures on the way to and from school as well as in school, these include children & adults.

Section 12: Complaints and concerns about school safeguarding policies

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).

2. Other complaints

Any other complaints will be handled by the Principal in accordance with guidance from the Governing Body and the Chief Executive Dr Martin Young.

3. Whistle-blowing

There is a separate [whistle-blowing policy](#) that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures – please see for further details.

Section 13: Record-keeping

Record-keeping

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

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

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily 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.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

- Records are both paper-based and electronic
- Records are held on school premises as well as on the electronic system
- Paper files are passed on to a new school and copies are not kept in the previous school, unless there is an existing family member attending. Electronic files are kept and stored securely indefinitely until the child is 25 (7 years after school leaving age).

- Electronic files are secure with access restrictions as embedded within CPOMs. This allows DSLs and Deputies to tailor what information is shared. Paper files are kept in a locked cabinet, in the DSLs office. Files are sent to a new school with signed for, recorded delivery. Files are placed in two envelopes; the first labelled for the DSL and Strictly Private and Confidential, and the second addressed to the school. This prevents sensitive information being obvious during transit. Electronic files are sent via a secure system such as CPOMs or Egress.

Further information about the sharing of information can be found in [Information Sharing: Advice for Practitioners providing safeguarding services to children](#)

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

Section 14: Supporting Pupils

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The federation and its academies may be the only stable, secure and predictable elements in the lives of children at risk. When in the federation their behaviour may be challenging and defiant or they may become withdrawn. The federation will endeavour to support the pupil through:

- The content of the curriculum;
- The Federation ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued;
- The federation ethos which supports and promotes British Values;
- The Cranford Park Academy Behaviour Policy, in line with the Park Federation Academy Trust's Statement of General Principles With Regard To Behaviour, which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred; Liaison with other agencies that support the pupil.

It is important to make children and young people aware of behaviour towards them that is not acceptable and how they can help keep themselves safe:

- The framework for Personal, Social and Health Education (PSHE) provides opportunities for children and young people to learn about keeping safe and who to ask for help if their safety is threatened.
- Issues such as Domestic Violence and abuse can be difficult to broach directly in the classroom. However, discussions about personal safety and keeping safe can reinforce the message that any kind of violence is unacceptable. Let children know that it is acceptable to talk about their own problems and signpost sources of help.
- Raising these issues can lead children to bring up personal problems and concerns and staff delivering lessons on these subjects need to be prepared for that possibility.
- All children are taught about internet safety and all parents and carers have access to materials which support this, information is advertised in the academy newsletter, school app and website and the federation's website.
- Pupils wishes and feelings are sought and shared regularly; in conversations, meetings and in reports to outside professionals.

The Use of Appropriate Adults - Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code. PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded, on CPOMS. If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns. A person whom there are grounds to suspect of an offence must be cautioned [1] before questioned about an offence [2], or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution. A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult means, in the case of a child:

- the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation
- a social worker of a local authority
- Failing these, some other responsible adult aged 18 or over who is not:
 - a police officer;
 - employed by the police;
 - under the direction or control of the chief officer of a police force; or
 - a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,
- the Principal of the school

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

[1] The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

[2] A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek cooperation while carrying out a search; or to seek verification of a written record

Section 15: Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- At Lake Farm Park Academy we pride ourselves on all staff having an awareness of mental health, we also have a mental health team for both children and staff. Mental Health First Champions, who support children, have completed the Mental Health Champions Foundation Programme with [Place2Be](#) and Mental Health Champions, who support staff, have completed e-learning with High Speed. The mental health lead is **Sam Dickerson** (DDSL).
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, and their high prevalence of special educational needs and mental health needs, can impact on their behaviour and education. (see appendix 1 for more information regarding Adverse Childhood Experiences- ACEs)
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking to the DSL/DDSL.
- If staff have a mental health concern about the parents of a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking to the DSL/DDSL.
- If staff have a mental health concern about another member of staff, this should be brought to the attention of the DSL/DDSL and/or Principal.

For more information on supporting [Mental Health & Behaviour in Schools](#) please see the guidance, as well as teaching resources and materials to heighten children's awareness of safeguarding issues at [Rise Above UK](#) and [Better Health - Every Mind Matters](#).

Section 16: Children Walking Home Alone

As part of our continual assessment of our safeguarding procedures we have reviewed our walking home alone protocols in line with other schools in the local area and government guidance. At Lake Farm Park Academy only children in years 5 & 6 are allowed to come to school unaccompanied or walk home alone. Therefore, all children from Nursery to Year 4 need to be dropped off and collected by an adult.

We do not allow siblings or children under the age of 16 to drop the children or collect them at the end of the day, there must be an adult present.

Pupils will not be allowed to be collected by another adult unless school is made aware first. If no one comes to collect a child and they do not have permission to walk home alone, they will be kept in school until parents are contacted and come to collect them. If no contact is made, a referral to Social Care will be made one hour after the child should have been collected, as per the Local Authority Policy guidance - Children Not Collected from School Nov 2018.

Parents should ensure that their child understands the green cross code/road safety and is aware of stranger danger. If your child is in year 5 or 6 and you would like to request that they come to school and/or walk home alone then the school requires you to sign a parental permission slip. When making the decision to allow your child to come to/from school unaccompanied please refer to the school guidance at the back of the permission slip.

Section 17: Keeping children safe in out of school settings

When services or activities are provided by the Academy Council, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case.

The Academy Council should 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 school or college 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 Academy Council should 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.

Appendices

These appendices are based on the Department for Education's statutory guidance, [Keeping Children Safe in Education \(2023\)](#).

Appendix 1: Further information regarding specific Safeguarding Issues

Children missing from education / Children absent from Education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

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

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

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

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

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

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

Pupils with a social worker

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

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

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

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

Looked After Children and previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies of maintained schools and proprietors of academies should ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.

In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The Designated Safeguarding Lead, through the designated teacher for looked after children, should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Schools must appoint a designated teacher for Looked After Children. At Cranford Park Academy, the designated teacher for Looked After Children is **Hayley O'Neill**.

On commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers will have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

- The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

Online Safety

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

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Have clear guidance that photographs of children must only be taken on school mobile phones and cameras, and downloaded onto school computers. Staff must be aware of any pupils who do not give their permission for their photograph to be taken and shared.

The 4 key categories of risk

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

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, disinformation, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a person impacted by the behaviour
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Although appropriate blocking is essential, there should not be so much that it restricts children's learning.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy, which you can find on our website [\[insert hyperlink for online-safety policy\]](#).

- Follow the guidance from the Department for Education regarding [filtering and monitoring standards](#). To support schools and colleges to meet this duty, the DfE has published this guidance which sets out that schools and colleges should:
 - identify and assign roles and responsibilities to manage filtering and monitoring systems.
 - review filtering and monitoring provision at least annually.
 - block harmful and inappropriate content without unreasonably impacting teaching and learning.
 - have effective monitoring strategies in place that meet their safeguarding needs.
 - The Board of Directors should review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

The academy ensures pupils are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad and balanced curriculum.

Please see the Online Safety ([add link](#)) for further details as well as [Think U Know](#) website for further information.

Serious Youth Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the associated risks and understand the measures in place to manage these.

Preventing youth violence and gang involvement

Preventing violence in schools can require a mix of universal, targeted or specialist interventions. School leaders should be able to:

- develop skills and knowledge to resolve conflict as part of the curriculum
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour
- understand risks for specific groups, including those that are gender-based, and target interventions
- safeguard, and specifically organise child protection, when needed
- carefully manage individual transitions between educational establishments, especially into Pupil Referral Units (PRUs) or alternative provision
- work with local partners to prevent anti-social behaviour or crime.

Domestic Abuse

Domestic abuse is categorised by any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- physical
- emotional
- psychological

- sexual
- financial

This definition includes honour-based abuse and forced marriage, and is clear that person impacted by the behaviours are not confined to one gender or ethnic group. The frequency and severity of domestic violence can vary dramatically, just one encounter counts as abuse, and it can be an ongoing pattern of behaviour. However, the one constant element of domestic abuse is the abuser's consistent efforts to maintain power and control over the person impacted by the behaviour.

Domestic abuse can affect anyone regardless of ethnicity, age, gender, sexuality or social background. If you are suffering from physical, sexual, psychological or financial abuse, or are being threatened, intimidated or stalked by a current or previous partner or close family member, it's likely you're a person impacted by the behaviour of domestic abuse.

Children who have witnessed domestic abuse are often persons impacted by the behaviours of emotional abuse. At Lake Farm Park Academy we are part of Operation Encompass. Operation Encompass is a police initiative which helps police and schools work together to provide emotional and practical help to children. The system ensures that when 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) 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 support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the person impacted by the behaviour (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: <https://www.actionagainstabduction.org/> and www.clevernevergoes.org

Child criminal exploitation: County lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs, groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the person impacted by the behaviour may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual

- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

For further information, please see [Criminal Exploitation of children and vulnerable adults: County Lines](#).

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the person impacted by the behaviour needs or wants, and/or for the financial advantage or increased status of the persons who instigated the behaviour or facilitator.

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

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

***'Any practitioner working with a child who they think may be at risk of child sexual exploitation should follow the guidance set out in Working Together and share this information with local authority children's social care. You should refer any concerns about a child's welfare to local authority children's social care. If you believe a child is in immediate risk of harm, you should contact the police.'* (KCSIE, 2022)**

Please see [Keeping Children Safe in Education 2023](#) pg 140 and [Child Sexual Exploitation: definition and guide for practitioners](#) for further information.

Indicators of sexual exploitation can include a child:

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

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those about:

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. 144 Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - [NCSC.GOV.UK](https://www.ncsc.gov.uk). **The Park Federation Trust follows, and is compliant with, the [filtering and monitoring standards as set out by the DfE](#).**

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

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple persons who instigated the behaviours.

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

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a person impacted by the behaviour of modern slavery, the support available to person impacted by the behaviours and how to refer them to the NRM is available in Statutory Guidance. Modern slavery: how to identify and support person impacted by the behaviours - [GOV.UK](https://www.gov.uk)

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 6.0 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 suffering from FGM may be:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating

Having frequent urinary, menstrual or stomach problems

- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the person impacted by the behaviour or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, “teacher” means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England). Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve local authority children’s social care as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the person impacted by the behaviour or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet. Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

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 person impacted by the behaviour and only one chance to save them.

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

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 Prevent Duty & preventing radicalisation

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

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

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. **Individual boroughs will explore the Prevent issues specific to their local area and these will be discussed within annual level 1 safeguarding training.**

Local area Prevent issues for Hillingdon

- Islamist – Islamic State and Al-Qaeda are the main national international threats, in the UK Al-Mahajiroun (proscribed group) would be a group of concern locally.
- Far Right – English Defence League, British National Party and Britain First. Whilst the latter two are also political parties, they promote hate propaganda.
- Extreme Right Wing – Combat 18, National Action (both are proscribed) and Generation Identity want all migrant repatriated to their countries of origin, these groups support and promote violence against anyone who is not White.
- Other groups – Q-Anon (USA based), Involuntary Celibates or Incels (online subculture associated with hating women and mass killings) as they are more commonly known as and school shootings are what we have seen from national and regional referrals.

We will ensure that suitable **web filtering and monitoring** is in place, and will equip our pupils to stay safe online at school and at home. **These aspects will be included in the school's Prevent risk assessment.**

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

Staff will be alert to changes in pupils' behaviour.

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

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

Children who are at risk of radicalisation may have low self-esteem, or be a person impacted by the behaviours 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 6.0 of this policy, including discussing their concerns with the DSL.

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

Child on child abuse

All staff should be aware that children can abuse other children (often referred to as child on child abuse) and should adopt an ‘it could happen here’ mentality, even if the school has no known reports of child on child abuse. This is most likely to include, but may not be limited to:

- abuse in intimate personal relationships between peers;
- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence); 8 Under Section 5B(11) (a) of the Female Genital Mutilation Act 2003, “teacher” means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- sharing self-generated indecent images known as sharing of nudes and semi-nudes;
- 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); and
- upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the person impacted by the behaviour humiliation, distress or alarm.

All staff should be clear as to the school’s or college’s policy and procedures with regards to child on child abuse.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

- Ensure staff reassure persons impacted by the behaviours that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the person impacted by the behaviour, alleged persons who instigated the behaviour(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that persons impacted by the behaviours may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the person impacted by the behaviour, alleged persons who instigated the behaviour(s) and friends from either side
- The DSL will take the lead role in any disciplining of the alleged persons who instigated the behaviour(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
 - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this
 - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are persons impacted by the behaviours of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all persons impacted by the behaviours are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Please read, [KCSIE \(2022\) Sexual violence & sexual harassment \(Part 5, pg 103-133\)](#) in conjunction with [Ofsted Review of sexual abuse in schools \(June 2021\)](#) and the school's positive behaviour policy [JEA Positive Behaviour Policy 2022 2023.pdf \(update link\)](#)

Private Fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

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

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

Homelessness

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

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

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

Non-collection of children

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

- Make call/s to all parent or named carer contact number/s

If it is not possible to contact a parent or named carer, 1 hour after the agreed finish time for the school day/activity, a phone call will be made to Hillingdon Children's Service 'Stronger Families Hub' on **01895 556006**.

This procedure is in line with the Local Authority 'Children Not Collected From School Procedure' and KCSIE (2023).

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:

- Carry out any necessary search of premises and local areas for **ten minutes (from when SLT are notified)**
- Make call/s to all parent or named carer contact number/s
- Inform the Emergency Services **by calling 999**

For further details see our Missing Pupils Policy.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Adverse Childhood Experiences (ACEs)

Adverse Childhood Experiences (ACEs) are potentially traumatic events that occur in childhood. ACEs can include violence, abuse, and growing up in a family with mental health or substance use problems. Toxic stress from ACEs can change brain development and affect how the body responds to stress. ACEs are linked to chronic health problems, mental illness, and substance misuse in adulthood. Some factors make the child more at risk than others whilst other factors can protect them from some of these experiences.

WHAT KINDS OF EXPERIENCES ARE ADVERSE?

Forms of ACEs include:

- Maltreatment** (i.e. abuse or neglect)
- Violence & coercion** (i.e. domestic abuse, gang membership, being a victim of crime)
- Adjustment** (i.e. migration, asylum or ending relationships)
- Prejudice** (i.e. LGBT+ prejudice, sexism, racism or disability)
- Household or family adversity** (i.e. substances misuse, intergenerational trauma, destitution, or deprivation)
- Inhumane treatment** (i.e. torture, forced imprisonment or institutionalisation)
- Adult responsibilities** (i.e. being a young carer or involvement in child labour)
- Bereavement & survivorship** (i.e. traumatic deaths, surviving an illness or accident)

RISK FACTORS

- Genetic influences**
 - Low IQ and learning disabilities
 - Specific development delay
 - Communication difficulties
 - Difficult temperament
 - Physical illness
 - Academic failure
 - Low self-esteem
- Family disharmony, or break up**
 - Inconsistent discipline style
 - Parent/s with mental illness
 - Parental substance abuse, addiction or alcoholism
 - Physical, sexual, emotional abuse or neglect
 - Parental criminality
 - Death and loss
- Bullying**
 - Discrimination
 - Breakdown in, or lack of, positive friendships
 - Deviant peer influences
 - Peer pressure
 - Poor pupil-to-teacher relationships
- Socio-economic disadvantage**
 - Homelessness
 - Disaster, accidents, war or other overwhelming events
 - Discrimination
 - Other significant life events
 - Lack of access to support services

PROTECTIVE FACTORS

- Child**
 - Secure attachment experience
 - Good communication skills
 - Having a belief in control
 - A positive attitude
 - Experiences of success and achievement
 - Capacity to reflect
- Family**
 - Family harmony and stability
 - Supportive parenting
 - Strong family values
 - Affection
 - Clear, consistent discipline
 - Support for education
- School**
 - Positive school climate that enhances belonging and connectedness
 - Clear policies on behaviour and bullying
 - 'Open door' policy for children to raise problems
 - A whole-school approach to promoting good mental health
- Community**
 - Wider supportive network
 - Good housing
 - High standard of living
 - Opportunities for valued social roles
 - Range of sport/leisure activities

Appendix 2: Safer Recruitment and DBS checks – policy and procedures

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

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our Child Protection and Safeguarding Policy **and the TPFAT policy on the employment of ex-offenders.**

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates, we will ask shortlisted candidates to:
- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching

- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true
- **We will also inform candidates that we will be considering carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.**

Seeking references and checking employment history

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

When seeking references we will:

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

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced 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, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK,

These could include, where available:

- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

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

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

Regulated activity means a person who will be:

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

Overseas checks

From 01 January 2021 the TRA Teacher Services system no longer maintains a list of those teachers who have been sanctioned in EEA member states. Advice about how information about a teacher's past conduct may be obtained can be found in [paragraph 279-283 of KCSIE \(2022\)](#).

Existing staff

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

- There are concerns about an existing member of staff's suitability to work with children; or

- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

We will obtain the DBS check for self-employed contractors.

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

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

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

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

Trainee/student teachers

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

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

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

Volunteers

We will:

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

Governors and members

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

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

The chair of the board will have their DBS check countersigned by the secretary of state.

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

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. **Ensure on day 1 the work experience student receives a school safeguarding leaflet so that they are aware of the basic safeguarding procedures. Work experience students should wear a red lanyard as they should be accompanied around the school by a member of staff and should not work alone with children.**

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.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. Staff will be allocated a safe area to store their belongings whilst in the school. Devices can be carried on the person, in silent mode and should not be used in the presence of children, unless there was an emergency.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

Visitors will be expected to wear a visitors badge that is fully visible for the duration of their visit. Visitors who have shown their DBS certificate, or have had a confirmation letter sent from their organisation prior to their visit, will wear a visitor badge with a green lanyard. Visitors who do not have their DBS information with them will be asked to wear a visitor badge with a red lanyard. In this circumstance, a member of school staff will remain with them at all times unless they are within a group of visitors of which at least one has a DBS certificate, in which case they would take responsibility of the visitor for the duration of the stay.

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. This can be done by asking to view the presentation beforehand to ensure content is appropriate, if this is not possible ensure school staff are present and that they know to alert the DSL if the content is concerning.

These individuals will wear a red lanyard and will be accompanied by a member of staff or co-worker, who has had the relevant DBS checks.

Appendix 3:

Section 1: Allegations of abuse made against staff

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

This section applies to all cases in which it is alleged that a current member of staff, supply teacher, volunteer or contractor 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, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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.

A 'case manager' will lead any investigation. This will be the Principal, or the Chief Executive Officer, where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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 have been consulted

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

If in doubt, the case manager will seek views from the Trust HR department and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal (or the CEO where the allegation is directly reported to the MAT and is against a staff member employed in the MAT's Central Trust Team or CEO where the Principal is the subject of the allegation or Federation Governance Safeguarding Lead where the CEO is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority (LADO). 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 local authority designated officer (LADO) – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (LADO) (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Further support is available through trade union representatives, or a colleague, for example your line manager and/or the DSL as well as through the ‘Employee Assistance Programme for guidance, support and counselling.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- **It is vital to note that if there is an allegation made against the Principal then this must be reported to the CEO of The Multi-Academy Trust (MAT) – Dr. Martin Young. If there was an allegation against the CEO, Dr Martin Young, Ranisha Dhamu (Federation Governance Safeguarding Lead) would be contacted.**
- **Organisations or Individuals using school premises - Schools and colleges 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, the school will follow their safeguarding policies and procedures, including informing the LADO.**

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Where there is no further action from the LADO, Police or Local Authority Childrens’ Social Care, following an allegation against a member of staff, the Park Federation may still choose to investigate internally.

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious 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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the 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 Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation, or report, is shown to be deliberately invented, or malicious, the Principal (or the CEO in the case of an allegation against the Principal or staff member in the MAT's Central Trust Team; or Federation Governance Safeguarding Lead in the case of an allegation against the CEO) will consider whether any disciplinary action is appropriate 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.

It will be decided if the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.

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

- We do not enter any safeguarding concerns about an adult on CPOMs. This is entered in the schools allocated recording system for LADO referrals or staff concerns.

Record-keeping

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

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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

References

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

We will include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

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

This will include consideration of (as applicable):

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

If a staff member feels unable to raise an issue with the federation or Local Authority, or feel that their genuine concerns are not being addressed, then they can contact the NSPCC whistleblowing helpline on 0800 028 0285.

Non-recent allegations

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

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

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: Concerns that do not meet the harm threshold

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

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
- Examples of such behaviour could include, but are not limited to:
 - Being overly friendly with children
 - Having favourites
 - Taking photographs of children on their mobile phone
 - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
 - Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

- Helping to identify any weakness in the school's safeguarding system

The DSL/DDSL and the Principal will work together to investigate low-level concerns, decide actions and reasons for actions.

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

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

Records will be:

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

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

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Simplified description of initial reporting process

Allegations against a staff member or volunteer

If a complaint of abuse is made against a member of staff or volunteer, the person receiving the complaint must take it seriously and immediately inform the Principal of the school. The Local Authority Designated Officer (LADO) must be involved at this initial stage.

Allegations against a member of the MAT's Central Trust Team staff

The federation has employees who are members of the MAT's Central Trust Team. These employees work across federation schools. If a complaint of abuse against one of these employees is received, it must be immediately reported to the Principal if the complaint has been made in a school, and to the Chief Executive

Officer (CEO) if the complaint has been received directly by the MAT. The Local Authority Designated Officer (LADO) must be involved at this initial stage. If the complaint is reported to a Principal, he or she must inform the MAT's CEO too but the reporting to the LADO must come first.

Allegation against the Academy Principal:

If the allegation is made against the Academy Principal, this must be reported to the MAT's CEO who then must contact the LADO at this initial stage. The procedures in this case will be similar to those for any other member of staff.

Allegation against the Trust's Chief Executive Officer:

If the allegation is made against the MAT's CEO, this must be reported to the Federation Governance Safeguarding Lead, Ranisha Dhamu who must then contact the LADO at this initial stage. The procedures in this case will be similar to those for any other member of staff.

Appendix 4 - Guidance on searching & confiscation

Staff can search a pupil with their consent

Any member of school staff can search a pupil for any item with their consent.

You don't need written consent – you can simply ask the pupil to turn out their pockets or to let you look in their bag or locker, and if the pupil agrees, you can go ahead.

If you suspect the pupil has an **inappropriate item** in their possession and they refuse a search, you can apply an appropriate punishment.

What counts as a inappropriate item, and what the punishment might be for refusing to comply with a search request, should be set out in your [behaviour policy](#).

Certain staff can search a pupil without their consent

What you can search for:

You can only undertake this type of search if you have 'reasonable grounds' for suspecting a pupil may have a **prohibited item** in their possession.

It's up to you to decide what 'reasonable grounds' might be. For example, you may:

Hear other pupils talking about the prohibited item; or

Notice a pupil behaving in a way that causes you to suspect they're concealing a prohibited item

Prohibited items are:

- Knives or weapons
- Alcohol
- Illegal drugs
- Stolen items
- Tobacco and cigarette papers
- Fireworks
- Pornographic images

Any article that the member of staff reasonably suspects has been, or is likely to be, used to:

- Commit an offence
- Cause personal injury or damage to property
- You can also search for any item that's:
 - Restricted by your school's rules, **and**
 - Been identified in the rules as an item which may be searched for

Who can carry out the search:

Only your Principal or a member of school staff authorised by them can search without consent.

The searcher must be the same sex as the pupil being searched, and another staff member **must** be present (if possible, they should be the same sex as well).

However, staff can search an opposite sex pupil and/or search without a witness present if:

- There's a risk that serious harm will be caused to a person if they don't conduct the search immediately, **and**
- It isn't reasonably practicable to summon another member of staff

Carrying out searches

Clothing

- The searcher may not require the pupil to remove any clothing other than outer clothing (i.e. clothing not worn next to the skin or immediately over underwear).
- Intimate searches can only be conducted by a person with more extensive powers (e.g. a police officer).

Lockers, desks and bags

These can only be searched in the presence of the pupil and another member of staff, except if:

- There's a risk that serious harm will be caused to a person if they don't conduct the search immediately, **and**
- It isn't reasonably practicable to summon another member of staff
- You can allocate lockers and desks to pupils on the condition that they consent to having these searched for any item whether or not they're present.

Use of force

Staff can use reasonable force when conducting a search for prohibited items (see the section above for a list).

You can confiscate items under certain circumstances

You can confiscate, retain or dispose of a pupil's property as a disciplinary penalty, where reasonable to do so.

There are ways you should handle specific prohibited items (see below):

- Weapons or items which are evidence of an offence - Pass these on to the police as soon as possible.
- Alcohol, tobacco and cigarette papers, fireworks - Either retain or dispose of these, but don't return them to the pupil.
- Controlled substances - In most cases, deliver these to the police as soon as possible. However, you can dispose of them if you think there's a good reason to do so. Take into account the relevant circumstances and use your professional judgement to determine whether you can safely dispose of the item yourself. If you're not sure of the legal status of a substance but you have reason to believe it may be a controlled drug, treat it as such.

Stolen items

If the items are valuable or illegal, deliver these to the police as soon as possible.

If they're low value, you may return them to the owner if you think there's a good reason to do so, or

retain or dispose of them if returning them is not practicable.

Pornographic images

Dispose of the images, unless you have reasonable grounds to suspect that their possession constitutes a specific offence (i.e. it is extreme or child pornography).

If you do, deliver them to the police as soon as reasonably practicable.

You can search and confiscate electronic devices

If during a search you find an electronic device, you may examine its data or files – and delete files – if you have a good reason to do so and:

- The device is prohibited by school rules, or
- You reasonably suspect it has been, or is likely to be, used to:
 - Commit an offence
 - Cause personal injury or damage to property
 - A 'good reason' to examine devices or erase data or files is if you reasonably suspect that data or files on the device in question have been, or could be, used to:
 - Cause harm
 - Disrupt teaching
 - Break the school rules
 - Evidence related to an offence

If you have reason to believe that the device contains evidence in relation to an offence, you must give the device to the police as soon as reasonably practicable.

If you search the device and find data or files related to the offence, don't delete these before handing the device over.

Reporting searches to parents

You don't need to inform parents before a search takes place, and you don't need their consent to search their child.

You should inform them if any of the following are found:

- Weapons
- Alcohol
- Illegal drugs
- Potentially harmful substances

Internal records

There's no requirement to make or keep a record of a search, however it may be advisable to do so for your own records, e.g. on CPOMs.