SAFEGUARDING AND CHLID PROTECTION POLICY AND PROCEDURES

Contents

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Key Academy contacts

Strategic **Designated Safeguarding Lead (DSL)** **(including EYFS provision)**	Victoria Buckland Email: office@hillview.bournemouth.sch.uk Telephone number (term time): 01202 514109
Operational Deputy Designated Safeguarding Lead (DDSL)	Jo Smith Email: office@hillview.bournemouth.sch.uk Telephone number (term time): 01202 514109
Deputy Designated Safeguarding Lead (DDSL)	Mike Hall Email: office@hillview.bournemouth.sch.uk Telephone number (term time): 01202 514109
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Headteacher	Victoria Buckland Email: office@hillview.bournemouth.sch.uk Telephone number (term time): 01202 514109

Chair of the Local Governing Body	Hannah Staddon Email: chairofgovernors@hillview.bournemouth.sch.uk Telephone number: 01202 514109
Local Governing Body safeguarding lead	Catherine Symmonds Email: clerktothegovernors@hillview.bournemouth.sch.uk Telephone number: 01202 514 109

Key external contacts

Designated Officer(s) of the local authority	LADO Telephone number: 01202 817600 Email: lado@bcpcouncil.gov.uk
BCP children's social care department	Telephone number: 01202 123334 Email: childrensfirstresponse@bcpcouncil.gov.uk Out of hours emergency: 01202 738256:
Dorset children's social care department	Telephone number: 01305 228866 Telephone number (for professionals): 01305 228558
Pan-Dorset Safeguarding Partners • BCP Council • Dorset Council • NHS Dorset • Dorset Police	Telephone number: 01305 221196 Email: pan-dorsetscp@dorsetcouncil.gov.uk
FGM reporting - non-emergency police contact number	101
Academy's Police liaison officer	SSCT Winton Police Station Telephone number: 01202 537551
Prevent partners and advice about extremism	Prevent Co-ordinator & Education Officer Tina Symington tina.symington@bcpcouncil.gov.uk **Dorset Police Prevent Partners Community Safety BCP** communitySafetyBCP@bcpcouncil.gov.uk Telephone number: 101 or 01202 229336 Email: PreventReferrals@Dorset.pnn.police.uk DfE Regional Prevent Co-ordinator: Cheri Fayers - Please contact the school office for details **Non-emergency DfE advice** 020 7340 7264 counter-extremism@education.gsi.gov.uk
UK Safer Internet Centre	0344 381 4772 helpline@saferinternet.org.uk

NSPCC whistleblowing helpline	Weston House 42 Curtain Road London EC2A 3NH Telephone: 0800 028 0285 Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/
Reporting serious wrongdoing to the Education and Skills Funding Agency	For further guidance please see: https://www.gov.uk/guidance/how-esfa-handles-whistleblowing-disclosures
Report Abuse in Education helpline	A dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for non-recent abuse. 0800 136 663 or email help@nspcc.org.uk

1   **Aims**

1.1   This is the safeguarding and child protection policy and procedures of Hill View Primary Academy.

1.2   Keeping Children Safe in Education refers to governing bodies and proprietors. In an Academy Trust the proprietor is the Board of Trustees. Within a multi academy trust, the Board of Trustees may delegate some of its functions to the local governing body (or equivalent) of an individual school or academy, but it cannot delegate its legal responsibilities for safeguarding. In this policy, references to Governing Body / Board of Trustees are references to the Proprietor i.e. the body with the legal responsibilities for safeguarding of Hill View Primary Academy.

1.3   The aims of this policy are as follows:

1.3.1   to actively promote the well-being of pupils;

1.3.2   to safeguard and promote the welfare of children, staff and others who come into contact with the Academy and to protect them from harm;

1.3.3   to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation;

1.3.4   to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;

1.3.5   to raise staff awareness about the Academy's safeguarding expectations;

1.3.6   to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;

1.3.7   to ensure consistent good safeguarding practice throughout the Academy to include the promotion of a zero tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it; and

1.3.8   to promote a whole school culture of safety, equality, and protection.

1.4   Every pupil should feel safe and protected from any form of abuse and neglect.

1.5   All staff should understand the indicators of abuse and neglect and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the Academy community are set out in Appendix 1**Error! Reference source not found.**.

1.6   Members of the Academy community (to include alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively, and appropriate action taken.

1.7   Anyone about whom a concern is raised should feel confident that they will be supported, and the matter will be handled sensitively, and that appropriate action will be taken.

1.8   This policy forms part of the Academy's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the Academy to

ensure that the best interests of pupils underpins, and is at the heart of, all decisions, systems, processes and policies.

1.9 Although this policy is necessarily detailed, it is important to the Academy that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils and parents. The Academy welcomes feedback on how we can continue to improve our policies.

2 **Scope and application**

2.1 This policy applies to the whole Academy including the Early Years Foundation Stage (**EYFS**).

2.2 This policy applies at all times including where pupils or staff are away from the Academy, whether they are on school-arranged activities or otherwise, and whether or not the Academy is open. It will therefore apply out of school hours and in the holidays.

2.3 This policy applies to core Academy activities, and to out of hours, and commercial activities.

2.4 This policy is designed to address:

2.4.1 the specific statutory obligations on the Proprietor of the Academy Trust (i.e. Reach South Academy Trust) to safeguard and promote the welfare of children;

2.4.2 The Board of Trustees charity law safeguarding duty to:

(a) provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;

(b) set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;

(c) have adequate safeguarding policies, procedures and measures to protect people; and

(d) provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local authority and Education and Skills Funding Agency (**ESFA**).

3 **Regulatory framework**

3.1 This policy has been prepared to meet the Academy's responsibilities under the following legislation:

3.1.1 Statutory framework for the Early Years Foundation Stage (DfE, September 2023);

3.1.2 Education and Skills Act 2008;

3.1.3 Children Act 1989;

3.1.4 Children Act 2004;

3.1.5   Education and Training (Welfare of Children) Act 2021;

3.1.6   Safeguarding Vulnerable Groups Act 2006;

3.1.7   Children and Social Work Act 2017;

3.1.8   Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR);

3.1.9   Equality Act 2010;

3.1.10   Human Rights Act 1998 ; and

3.1.11   Charities Act 2011.

3.2   This policy has regard to the following guidance and advice:

3.2.1   Statutory guidance:

(a)   Keeping children safe in education (DfE, September 2024) (**KCSIE**);

(b)   Working together to safeguard children 2023 (HM Government, updated July 2022) (**WTSC**);

(c)   Disqualification under the Childcare Act 2006 (DfE, August 2018);

(d)   Revised Prevent duty guidance for England and Wales (HM Government, September 2023);

(e)   Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, February 2021);

(f)   Relationships education, relationships and sex education and health education guidance (DfE, September 2021);

(g)   Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020);

(h)   Searching, screening and confiscation: advice for schools (DfE, July 2022, updated July 2023

(i)   PACE Code C 2019

(j)   Working Together to Improve School attendance (DfE August 2024)

3.2.2   Non-statutory advice:

(a)   What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);

(b)   Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018, updated July 2023);

(c)   Behaviour in schools: advice for headteachers and school staff (DfE, September 2022, updated October 2022);

(d)   Working together to improve school attendance (DfE, 2022, updated August 2023);

(e) Meeting digital and technology standards in education (DfE, March 2023);

(f) Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, December 2020);

(g) Searching, screening and confiscation: advice for schools (DfE, July 2022, updated July 2023);

(h) Child sexual exploitation: definition and a guide for practitioners (DfE, February 2017);

(i) Forced marriage resource pack (Home Office, May 2023)

(j) Virginity testing and hymenoplasty: multi-agency guidance (DHSC, July 2022, updated August 2023);

(k) Teaching online safety in schools (DfE, June 2019, updated January 2023);

(l) Harmful online challenges and online hoaxes (DfE, February 2021);

(m) Multi-agency practice principles for responding to child exploitation and extra-familial harm (TCE support programme)

(n) Educate Against Hate (HM Government 2018);

(o) Managing the risk of radicalisation in your education setting (DfE, October 2022, updated September 2023);

(p) Equality Act 2010: advice for schools (DfE, June 2018);

(q) Keeping children safe in out-of-school settings (DfE, April 2022)

(r) Safeguarding children and protecting professionals in early years settings: online safety considerations (UK Council for Internet Safety, February 2019);]

3.2.3 Charities advice:

(a) How to report a serious incident in your charity (Charity Commission, June 2019) (noting that any report will necessarily need to be made to the ESFA rather than the Charity Commission on account of the Academy Trust's exempt charity status);

(b) Reporting a serious incident in your charity when it involves a partner (Charity Commission, December 2019) (again, with the requirement to report being to the ESFA);

(c) How ESFA handles whistleblowing disclosures (ESFA, September 2019);

(d) Safeguarding duties for charity trustees (Charity Commission, June 2022;

3.2.4 Pan Dorset/BCP Safeguarding Partners referral / threshold procedures / guidance.

3.3 The following Academy policies, procedures and resource materials are relevant to this policy:

    3.3.1 Acceptable Workplace Behaviour Policy;

    3.3.2 Social media policy;

    3.3.3 Whistleblowing policy;

    3.3.4 Online safety policy;

    3.3.5 Behaviour policy;

    3.3.6 Anti-bullying policy;

    3.3.7 Acceptable use policy for pupils;

    3.3.8 Attendance policy;

    3.3.9 Special educational needs and disability policy;

    3.3.10 Health and safety policy;

    3.3.11 Relationships Education policy (RSE) and

    3.3.15 Administration of medicines and supporting pupils with medical conditions policy.

4 Publication and availability

4.1 This policy is published on the Academy website.

4.2 This policy is available in hard copy on request.

4.3 A copy of the policy is available for inspection from reception during the school day.

4.4 This policy can be made available in large print or other accessible format if required.

5 Definitions

5.1 Where the following words or phrases are used in this policy:

    5.1.1 References to the **Proprietor** in this policy are references to Reach South, the Academy Trust. In all academy trusts, the Board of Trustees is responsible for the safeguarding arrangements of its school/s. In a multi-academy trust, the Board of Trustees may choose to delegate certain safeguarding functions to a local governing body under a scheme of governance. The Proprietor cannot delegate its legal responsibilities for safeguarding to a local governing body. In this policy, references to Board of Trustees are references to the Proprietor.

    5.1.2 References to **Parent** or **Parents** means the natural or adoptive Parents of the pupil (irrespective of whether they are or have ever been married, with whom the pupil lives, or whether they have contact with the pupil) as well as any person who is not the natural or adoptive Parent of the pupil, but who has care of, or Parental responsibility for, the pupil (e.g. foster carer / legal guardian).

5.1.3 References to **school days** means Monday to Friday, when the Academy is open to pupils during term time. The dates of terms are published on the Academy's website. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working;

5.1.4 **Safeguarding** is the protection of people from harm.

5.1.5 **Safeguarding and promoting the welfare of children** is defined in WTSC and KCSIE as:

(a) providing help and support to meet the needs of children as soon as problems emerge

(b) protecting children from maltreatment, whether that is within or outside the home, including online

(c) preventing impairment of children's mental and physical health or development

(d) ensuring that children grow up in circumstances consistent with the provision of safe and effective care

(e) promoting the upbringing of children with their birth parents, or otherwise their family network4 through a kinship care arrangement, whenever possible and where this is in the best interests of the children

6 **taking action to enable all children to have the best outcomes.**

6.1.1 **CSC** means Children's Social Care and includes, depending on the context, the team based in the local authority where the Academy is located and, where appropriate, the team based in the local authority where the child is a resident.

6.1.2 **DSL** means the Academy's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.

6.1.3 **Designated Officer** means designated officer at the local authority (often referred to as the LADO). The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners.

6.1.4 References to **harmful sexual behaviour** in this policy refer to the DfE's definition: sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or abusive towards another child, young person or adult.

6.1.5 Reference to **staff** includes all those who work for or on behalf of the Proprietor, regardless of their employment status, including contractors, supply staff, volunteers, Trustees and Governors unless otherwise indicated.

6.1.6 Senior Leadership Team (**SLT**) comprises of the Headteacher, Strategic DSL, Deputy Headteacher Operational DSL, and Deputy Headteacher, DDSL

7   **Responsibility statement and allocation of tasks: the Academy's approach to safeguarding leadership**

7.1   The Board of Trustees has overall responsibility for all matters which are the subject of this policy including:

7.1.1   specific responsibilities as described in Part 2 of KCSIE. Legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the Academy, having regard to relevant guidance issued by the Secretary of State;

7.1.2   strategic leadership responsibility for the Academy's safeguarding arrangements; and

7.1.3   specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.

7.2   The Board of Trustees:

7.2.1   appoints a Board level lead on safeguarding matters, whose contact details are set out in the Academy contacts list at the front of this policy;

7.2.2   ensures that all members of the Board of Trustees receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;

7.2.3   ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have;

7.2.4   ensures that appropriate arrangements are in place for the whole Board to discharge their function, including appropriate consideration of safeguarding matters at Board meetings and a holistic annual review of safeguarding; and

7.2.5   establishes appropriate delegation arrangements at Academy level, led by the Headteacher and DSL, to enable the Academy to discharge its safeguarding duties effectively.

7.3   The Board of Trustees is aware of its duties under the Equality Act 2010 and the requirement under s 149 of the Equality Act 2010 to meet the Public Sector Equality Duty. This means in carrying out its functions, the Board of Trustees is required to have due regard to the need to:

7.3.1   eliminate discrimination and other conduct that is prohibited by the Act;

7.3.2   advance equality of opportunity between people who share a protected characteristic and people who do not share it; and

7.3.3   foster good relations across all characteristics - between people who share a protected characteristic and people who do not share it.

7.4   To ensure the efficient discharge of its responsibilities under this policy, the Board of Trustees has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Trust Head of Safeguarding	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Trust Head of Safeguarding	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the Academy's processes under the policy	Trust Head of Safeguarding	As required, and at least annually
Assessing the adequacy of safeguarding arrangements for those who use or hire premises	Governing Body	As a minimum Before commencement of arrangement and thereafter at least annually
Formal annual review of the Academy's safeguarding policies and procedures and their implementation	Governing Body	As a minimum annually, and as required
Overall responsibility for content and implementation	Governing Body	As a minimum annually

7.5   **Headteacher**

7.5.1   The Headteacher is responsible for the overall management of the Academy and for the management of concerns and allegations about staff.

7.5.2   The Headteacher ensures that the Academy's policies and procedures, adopted by the Board of Trustees (particularly those concerning referrals of cases of suspected abuse and neglect) are understood, and followed by all staff[1].

7.6   **Designated Safeguarding Lead (DSL)**

7.6.1   The DSL is a senior member of staff of the Academy's leadership team with the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) throughout the Academy.

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[1] Paragraph 80 KCSIE 2024

7.6.2   The DSL has the appropriate status and authority within the school to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the Academy contacts list at the front of this policy. The main responsibilities of the DSL are set out in Annex C of KCSIE.

7.6.3   The DSL will also liaise with the Headteacher to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles to whom the provisions of PACE code c and any other code of practice apply.

7.6.4   The Operational DSL will take lead responsibility for pupils who are looked after children.[2]

7.6.5   The DSL will support the mental health lead and is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of pupils and staff.

7.6.6   If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL. The Deputy DSL's details are also set out in the Academy contacts list at the front of this policy.

8   **Specific safeguarding duties in relation to children**

8.1   Safeguarding and promoting the welfare of children is **everyone's** responsibility.

8.2   The Academy is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The Academy requires everyone who comes into contact with children and their families to share this commitment.

8.2.1   The Academy will:

(a)   understand its role in the safeguarding partner arrangements Pan Dorset Safeguarding Partnership and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by BCP and Dorset Safeguarding Partners;

(b)   be alert to signs of abuse whether in school, within the child's family or from outside, and take steps to protect individuals from any form of abuse or neglect, whether from an adult or another child;

(c)   include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;

(d)   promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;

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[2] KCSIE states that there should be a designated member of staff with responsibility for the welfare and progress of looked after children and must be trained for the role. As the DSL has day to day responsibility for all aspects of safeguarding and child protection we recommended that the DSL takes on this role. However if it is not the case please amend the policy to ensure that it reflects the Academy's custom and practice.

(e)   take active steps to promote school attendance;

(f)   allow staff to determine how best to build trusted relationships with pupils which facilitate communication within the parameters of the staff Appropriate Workplace Behaviour Policy;

(g)   deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;

(h)   design and operate procedures which, so far as possible, ensure that staff, pupils and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

(i)   prepare staff to identify children who may benefit from early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;

(j)   be alert to children who are at potentially greater risk of harm (both online and offline) including children who need a social worker and children requiring mental health support;

(k)   be alert to the needs of pupils with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and where additional barriers can exist when detecting abuse or neglect;

(l)   encourage a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the Academy to protect them;

(m)   operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

(n)   assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

(o)   identify pupils who may be susceptible to extremist ideology and radicalisation, and know what to do when they are identified; and

(p)   consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the Academy or in the local area.

8.3   Staff may follow the Academy's whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the Academy or potential failures by the Academy or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns direct to the Academy's Local Authority or to the ESFA if they consider that the Academy has failed to deal with concerns appropriately.

9   **Reporting obligations of staff**

9.1   **Reporting obligations generally**

9.1.1   Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interests of the pupil.

9.1.2   Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences as harmful e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and / or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

9.1.3   All staff have a duty to:

(a)   report any concerns they may have about the safety and / or well-being of pupils;

(b)   report any concerns they may have about the safety and / or well-being of other persons associated with the Academy;

(c)   report any safeguarding concerns about staff or anyone else associated with the Academy; and

(d)   follow up on any such reports to ensure that appropriate action is or has been taken.

9.1.4   The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the SLT or directly to children's social care (whether the Academy's local authority or that local to the child's home address) or police in their absence for guidance.

9.2   **What to do if staff have a concern about a pupil's welfare**

9.2.1   If staff have **any concern about a pupil's welfare**, they should follow the procedures in this policy and report their concern to the DSL (or the DDSL in the DSL's absence) **immediately**.

(a)   The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy.

(b)   See Appendix 2 below, for guidance about what to do when receiving a disclosure and paragraph 24 below relating to recording a concern.

9.2.2   A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need, or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

9.2.3   Teachers must report known cases of female genital mutilation (**FGM**) to the police. See Appendix 1**Error! Reference source not found.** for further i

nformation about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

9.2.4   If the concern involves an **allegation or concern raised about a member of staff**, supply staff, contractors or volunteers, this must be reported in accordance with the Allegations Against Staff Policy or the Low Level Concerns Policy AND parts 1 and 4 of KCSIE.

9.2.5   **What if the DSL is unavailable?**

(a)   The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted via the school email in relation to any safeguarding concerns out of school hours.

(b)   If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the SLT and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.

(c)   Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 12 below for further details on making a referral.

(d)   Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the SLT, as soon as is practically possible.

9.3   **Action by the DSL**

9.3.1   On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the appropriate Local Safeguarding Partners procedures and referral threshold document. Such action may include:

(a)   managing any support for the pupil internally via the Academy's own pastoral support processes, seeking advice from children's social care where required (see 10 below);

(b)   undertaking an early help assessment (which generally requires parental consent) (see 11 below); or

(c)   making a referral for statutory services (see 12 below).

9.3.2   The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

9.3.3   Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.

9.3.4   If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

10   Managing support for pupils internally

10.1   The Academy has a framework for the identification, assessment, management and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified. See section 23.

10.2   The Academy will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from CSC where necessary.

11   Early help assessment

11.1   Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents, children or whole families, and is generally supported by CSC in consultation with the family.

11.2   The Academy understands that providing early help is more effective in promoting the welfare of children than reacting later.

11.3   The Academy's safeguarding training includes guidance about early help processes and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:

11.3.1   is disabled or has certain health conditions and has specific additional needs;

11.3.2   has special educational needs (whether or not they have a statutory education, health and care plan);

11.3.3   has a mental health need;

11.3.4   is a young carer;

11.3.5   is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

11.3.6   is frequently missing / goes missing from care or from home;

11.3.7   is at risk of modern slavery, trafficking, sexual or criminal exploitation;

11.3.8   is at risk of being radicalised or exploited;

11.3.9   has a family member in prison, or is affected by parental offending;

11.3.10   is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

11.3.11   is misusing alcohol or other drugs themselves;

11.3.12   is looked after or has returned home to their family from care;

11.3.13   is at risk of "honour based" abuse such as Female Genital Mutilation or Forced Marriage;

11.3.14   is a privately fostered child; and

11.3.15 is persistently absent from education including persistent absences for part of the school day.

11.4 A member of staff who considers that a pupil may benefit from early help should keep a written record of their concerns and in the first instance discuss this with the DSL (see paragraph 24 below and Appendix 2 for further guidance). The DSL will consider the appropriate action to take in accordance with the child's Safeguarding Children Partners menu of early help services and their referral threshold document and will support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.

11.5 If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases, Academy staff may be required to take a lead role.

11.6 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse, or does not appear to be improving.

12 Making a referral

12.1 **Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately.**

12.2 "Harm" is the "ill treatment or impairment of the health or development of a child." Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child."

12.3 The contact details for the Academy CSC team are set out at the front of this policy. Staff should bear in mind that referrals may be required to the Academy's CSC team and / or the pupil's CSC team.

12.4 Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professional as well as a child themselves, family members and members of the public. The child's local safeguarding partners will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC.

12.5 **Statutory assessments**

12.5.1 Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

(a) **Children in need:** *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.* Children in need may be assessed under section 17 of the Children Act 1989.

(b) **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the

Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm.*

12.6   Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 24 of KCSIE.

12.7   Parental consent is not always required for referrals to statutory agencies, although it is best practice as long as it will not put the child at risk of harm. Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

12.7.1   personal details of the child including the child's developmental needs;

12.7.2   detailed information about the concern;

12.7.3   information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

12.8   If the referral is made by telephone, this should be followed up in writing.

12.9   If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

12.10   Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

12.11   Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves.

13   **Allegations against pupils - child-on-child abuse**

13.1   Allegations against pupils should be reported in accordance with the procedures set out in this policy in Appendix 3**Error! Reference source not found.**. If harmful s exual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

13.2   All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

14   **Extra-familial harm/Contextual Safeguarding**

14.1   Safeguarding incidents and / or behaviours can be associated with factors outside the Academy and / or can occur between children outside the Academy, inside and outside of home and online.

14.2   All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare and should record these appropriately.

14.3   Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

14.4   Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation and serious youth violence, county lines and radicalisation.

15   Risk assessment

15.1   Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

15.2   The format of risk assessment may vary and may be included as part of the Academy's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the Academy's approach to promoting pupil welfare will be systematic and pupil focused.

15.3   The Headteacher has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

15.4   Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

16   What to do if staff have a safeguarding concern about someone else's welfare

16.1   Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

16.2   In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

17   Allegations made and or / concerns raised about staff and others in school

17.1   The Academy has a policy and procedures for managing allegations made and / or concerns raised about any adult working for, or on behalf of, the Academy, whether paid or unpaid, or any Other Adult which may affect the safety and welfare of children.

17.2   The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false or unsubstantiated allegations. The policy and procedures are set out in the Allegations Against Staff and Low Level Concerns Policies and the guidance in Parts 1 and 4 of KCSIE.

17.3 The Academy will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.

17.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the Academy in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the Academy. This guidance is contained in The Appropriate Workplace Behaviour Policy and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

18 Informing parents

18.1 Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Headteacher] the Designated Officer(s), children's social care, the police and / or the pupil before discussing details with parents.

18.2 In all cases, the DSL will be guided by the BCP and Dorset Safeguarding Partners referral threshold document.

19 Additional reporting

19.1 In addition to the reporting requirements explained above, the Board of Trustees of the Academy will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

19.1.1 **Health and Safety Executive**

(a) The Academy is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the Academy's Health and safety policy for further details about this.

19.1.2 **Education and Skills Funding Agency (ESFA)**

(a) The Academy Trust is an exempt charity and is required to report all serious incidents to the ESFA promptly and in accordance with the guidance How to report a serious incident in your charity (Charity Commission, June 2019) includes examples of incidents it may be necessary to report.

19.1.3 **Disclosure and Barring Service (DBS)**

(a) A referral to the DBS will be made promptly if the criteria are met. See Reach South Academy Trust DBS Policy.

19.1.4 **Teaching Regulation Agency (TRA)**

(a) Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed, or would have been dismissed if he / she had not resigned.

19.1.5 **Ofsted**

(a) The Academy will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS provision registered with Ofsted (whether that allegation relates to harm or abuse committed on the premises or

elsewhere), and will provide details of the action taken in respect of those allegations.]

19.1.6 **Insurers**

(a)   The Board of Trustees will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

(b)   Care should be taken to ensure this is done before renewal to ensure that the Board of Trustees complies with its duties under the Insurance Act 2015. If the Board of Trustees is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

20   Safer recruitment and supervision of staff

20.1   The Academy is committed to practising safer recruitment, which includes carrying out pre-appointment checks to determine that staff (including those employed by another organisation) are suitable to work with or around children. See the Academy's separate Recruitment policy.

20.2   The Proprietor maintains a single central register of appointments for all staff.

20.3   Staff connected to the Academy's early years and later years provisions are under an ongoing duty to inform the Academy if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006.

20.4   The Academy's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the Academy's separate Visitors Guidance.

21   Use of mobile technology

21.1   The Academy's policy on the use of mobile technology, including phones and cameras, in the Academy, is as follows:

21.1.1 the Academy's Acceptable use policy for pupils sets out the expectations on pupils from Year R to Year 6. In the EYFS setting and Years 1 to 4, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises;

21.1.2 all staff (including staff in the EYFS setting) should use mobile devices and cameras in accordance with the guidance set out in the staff Appropriate Workplace Behaviour Policy;

21.1.3 parents of all pupils (including parents of pupils in the EYFS setting) may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

21.2   The Academy allows access to the internet onsite when an adult is present and for a specific educational reason. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.

21.3   The Academy's approach to online safety is set out in the Academy's Online safety policy and Acceptable use policy for pupils.

22   Training

22.1   The Academy ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

22.2   The level and frequency of training depends on the role of the individual member of staff.

22.3   The Academy maintains records of all staff training.

22.4   All training will be carried out in accordance with BCP and Pan Dorset Safeguarding Partners procedures where possible.

22.5   **Induction**

22.5.1   All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

(a)   this policy;

(b)   the role, identity and contact details of the DSL and their Deputy(s);

(c)   the Behaviour policy for pupils;

(d)   the Anti-bullying policy, which includes details of the Academy's policy on cyberbullying and prejudice-based and discriminatory bullying;

(e)   the staff Appropriate Workplace Behaviour Policy including the Whistleblowing policy / Acceptable use policy for staff / Staff / pupil relationships, low level concerns policy / Staff social media policy;

(f)   the safeguarding response to children who are missing from education particularly on repeat occasions and / or prolonged periods;

(g)   the Academy's approach to online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;

(h)   safeguarding training in accordance with BCP and Dorset Safeguarding Partners procedures including guidance on managing a report of child-on-child harmful sexual behaviour;

(i)   where determined appropriate by the Board of Trustees, a copy of Annex A of KCSIE for those staff not working directly with children; or

(j)   a copy of Part 1 and, where appropriate, Annex B of KCSIE for school leaders and those who work directly with children; and

(k)   appropriate Prevent duty training.

22.6   **Safeguarding training**

22.6.1 Staff not working directly with children will receive a copy of this policy and, where determined appropriate by the Board of Trustees, Annex A of KCSIE and will be required to confirm that they have read and understand these.

22.6.2 School leaders and all staff working directly with children will receive a copy of this policy and Part 1 and where appropriate, Annex B of KCSIE, and will be required to confirm that they have read and understand these.

22.6.3 Members of the SLT (including the Headteacher) and the Nominated Safeguarding Governor will receive a copy of this policy and be expected to read all of KCSIE.

22.6.4 The Headteacher and all staff members will undertake appropriate safeguarding training which will be updated at least annually. In addition, all staff members will receive informal safeguarding and child protection updates including online safety via email, bulletins and staff meetings on a regular basis and at least annually.

22.6.5 Staff development training will also include training on online safety which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the school, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the Academy.

22.6.6 Additionally, the Academy will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child-on-child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

22.6.7 All Governors receive safeguarding training (including online safety) on induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the Academy's safeguarding policies in place are effective and support a robust whole school approach to safeguarding. This training will be regularly updated.

22.6.8 The Nominated Safeguarding Governor and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. As part of that training the Nominated Safeguarding Governor will be expected to read the entirety of KCSIE. All other Governors will be expected to read Part 2 of KCSIE.

22.6.9 The Academy has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings, and professional development reviews]. This includes information on how staff can report concerns occurring out of hours / out of term.

22.6.10 **Designated Safeguarding Lead** (**DSL**)

(a)   The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and prevent awareness training and will be updated at least every two years.

(b)   In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex C of KCSIE.

(c)   Prevent duty training will be consistent with the Government's Prevent training for schools. See Educate Against Hate (HM Government, 2018) for further details.

22.6.11 **Teaching pupils about safeguarding**

(a)   The Academy teaches pupils about safeguarding through the curriculum and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.

(b)   The Academy recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

(c)   Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through relationships education and PSHE education appropriate to their age and stage of development. It will tackle issues such as; healthy and respectful relationships, boundaries and consent, stereotyping, prejudice and equality, body confidence and self-esteem, how to recognise abusive relationships, including coercive and controlling behaviour, concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, so-called "honour-based" violence and how to access support, what constitutes sexual harassment and sexual violence and why these are always unacceptable.[3]

(d)   Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled.

(e)   The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that pupils learn how to keep themselves safe on-line and when accessing remote learning. The Academy has ensured appropriate filters and monitoring systems are in place and meet the DfE's filtering and monitoring standards (see the Online safety policy) and is mindful that this should not lead to unnecessary restrictions on learning.

(f)   The Academy keeps in regular contact with parents and carers to reinforce the importance of pupils being safe online and make them aware of the systems in place to filter and monitor online use and the sites pupils will be expected to access during learning.

23   Monitoring and review

23.1   The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Governing Body as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the Academy's safeguarding arrangements.

23.2   Any safeguarding incidents at the Academy will be followed by a review of these procedures by the DSL and a report made to the Governing Body. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the Academy's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.

23.3   This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

23.4   The Board of Trustees will also undertake an annual review of this policy and the Academy's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety and filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks its pupils face.

23.5   The Board of Trustees will review this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Board of Trustees will be made.

24   Record keeping

24.1   All concerns, discussions and decisions made and the reasons for those decisions should be recorded. This will also help if / when responding to any complaints about the way a case has been handled by the Academy. Information should be kept confidential and stored securely on CPOMS. These should include:

24.1.1   a clear and comprehensive summary of the concern;

24.1.2   details of how the concern was followed up and resolved; and

24.1.3   a note of any action taken, decisions reached and the outcome.

24.2   The information created in connection with this policy may contain personal data. The Academy's use of this personal data will be in accordance with data protection law. The Academy has published on its website privacy notices which explain how the Academy will use personal data. All records created in accordance with this policy are managed in accordance with the Academy's policies that apply to the retention and destruction of records.

24.3 As far as pupil records[4] are concerned:

24.3.1 Staff must record all concerns about a pupil on the Academy's CPOMS system. Guidance on record keeping is set out in Appendix 2.

24.3.2 The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

24.4 **Information sharing and multi-agency working**

24.4.1 The Academy will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The Academy will always act in order to safeguard and promote the welfare of others.

24.4.2 The Academy understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the Academy's paramount concern. Schools have clear powers to share, hold and use information for these purposes and the UK GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

24.4.3 When the Academy receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the Academy will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. The Academy will also have regard to its data protection policies. The Academy's Data Protection Lead will work with the DSL as appropriate to determine what should be disclosed.

24.4.4 The Academy will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

24.4.5 Where allegations have been made against staff, the Academy will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

24.4.6 While the Academy will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

25 **Version control**

Date of adoption of this policy	2nd October 2024 ratified
Date of last review of this policy	16/9/24

Date for next review of this policy	September 2024

Appendix 1 Forms of abuse and neglect and specific safeguarding risks

1 **Abuse and neglect**

1.1 Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

1.2 Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

2 **Definitions of abuse and neglect**

2.1 **Abuse**: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

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

2.3 **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudiced-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

2.4 **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images,

watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it. The Academy policy and procedures can be found in Appendix 3.

2.5 **Neglect**: the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to; provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3 **Signs of abuse**

3.1 Possible signs of abuse include, but are not limited to:

3.1.1 the pupil says they have been abused or asks a question or makes a comment which gives rise to that inference;

3.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;

3.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

3.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general well-being;

3.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;

3.1.7 the pupil is reluctant to go home, or has been openly rejected by their parents or carers; and

3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

3.2 Mental health problems can also be a sign of abuse, neglect or exploitation.

3.3 The [• name of county / borough] Safeguarding Partners can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child

is being abused (March 2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

4   **Specific safeguarding issues**

4.1   Statutory guidance acknowledges the following as specific safeguarding issues:

4.1.1   child abduction and community safety incidents;

4.1.2   children and the court system;

4.1.3   children with unexplainable and or/persistent absences from education (see section 5 below);

4.1.4   children with family members in prison;

4.1.5   child criminal exploitation and child sexual exploitation (see section 7 below);

4.1.6   county lines (see section 8 below);

4.1.7   modern slavery and the national referral mechanism;

4.1.8   cybercrime; (see section 10 below)

4.1.9   domestic abuse (see section 11 below);

4.1.10   homelessness;

4.1.11   mental health;

4.1.12   so-called "honour-based" abuse (including Female Genital Mutilation and Forced marriage) (see sections 12, 13 and 14 below);

4.1.13   preventing radicalisation (see section 15 below);

4.1.14   child-on-child abuse (see Appendix 3 below);

4.1.15   sexual violence and sexual harassment between children in schools and colleges (see Appendix 3);

4.1.16   serious violence;

4.1.17   upskirting (see section 19 below).

4.2   Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

5   **Children who have unexplainable and or/persistent absences from education**

5.1   Children being absent from school, particularly repeatedly and / or for prolonged period and children missing education, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called "honour-based" abuse or risk of forced marriage. School attendance registers are carefully monitored

to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the Academy gives rise to a concern about their welfare. Further information can be found in the statutory guidance Working Together to Improve School Attendance.

5.2   Where reasonably possible the Academy will hold more than one emergency contact for each pupil.

5.3   The Academy shall inform the local authority of any pupil who is going to be added to or deleted from the Academy's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

5.4   This will assist the local authority to:

5.4.1   fulfil its duty to identify children of compulsory school age who are missing from education; and

5.4.2   follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

5.5   The Academy shall inform the local authority of any pupil who:

5.5.1   fails to attend school regularly; or

5.5.2   has been absent without the Academy's permission for a continuous period of ten school days or more, at such intervals as are agreed between the Academy and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

6   **Elective Home Education (EHE)**

6.1   Where a parent expresses their intention to remove a pupil from school with a view to educating at home, the Academy will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and / or has a social worker.

7   **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

7.1   Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:

7.1.1   in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or

7.1.2   for the financial advantage or increased status of the perpetrator or facilitator; and / or

7.1.3   through violence or threat of violence to victims (and their families).

7.2   Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may

be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

7.3   CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

7.4   The victim may have been exploited even if the activity appears consensual.

7.5   CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

7.6   Some of the following can be indicators of both CSE and CCE, including children who:

    7.6.1   appear with unexplained gifts, money or new possessions;

    7.6.2   associate with other young people involved in exploitation;

    7.6.3   suffer from changes in emotional well-being;

    7.6.4   misuse drugs and alcohol;

    7.6.5   go missing for periods of time or regularly come home late; or

    7.6.6   regularly miss school or education or do not take part in education.

7.7   Children who have been exploited will need additional support to help maintain them in education.

7.8   CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and / or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

7.9   The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:

    7.9.1   have older boyfriends or girlfriends; or

    7.9.2   suffer from sexually transmitted infections or become pregnant.

8   County lines

8.1   County lines[5] is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move, store and sell drugs and money and

[5] See the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance for more information.

they will often use coercion, intimidation, violence (including sexual violence) and weapons.

8.2   Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

8.3   A number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE) may also be applicable to children involved in county lines.

8.4   Additional reporting duties:

8.4.1   if a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation;

8.4.2   where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism[6] should be considered.

9   **Serious violence**

9.1   Indicators which may signal children are at risk from, or are involved with serious violence crime may include:

9.1.1   Increased absence from school;

9.1.2   a change in friendships or relationships with older individuals or groups;

9.1.3   a significant decline in performance;

9.1.4   signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;

9.1.5   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.

9.2   Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence e.g. being male, having frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

10   **Cybercrime**

10.1   Cybercrime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either "cyber-enabled" (crimes that can

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[6] For further information and a definition of trafficking, see: National Crime Agency - modern slavery and human trafficking and the DfE and Home Office guidance: Trafficking: safeguarding children

happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer).

10.2   Cyber-dependent crimes include:

10.2.1   unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;

10.2.2   denial of Service (Dos or DDos) attacks or "booting" - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;

10.2.3   making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.

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

10.4   The DSL (or deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when 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.

11   Domestic abuse

11.1   Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

11.2   Children can be victims of domestic abuse. They may see hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

11.3   All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and / or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

11.4   Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

12   So-called "honour-based" abuse

12.1   All forms of so-called "honour-based" abuse are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors

such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.

12.2   If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

13   **Female genital mutilation (FGM)**

13.1   FGM is a form of so-called "honour-based" abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.

13.2   There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the Multi-agency statutory guidance on FGM (HM Government, July 2020) (pages 61 - 63 focus on the role of schools).

13.3   All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

13.4   If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (January 2020) for further details about the duty.

13.5   Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the Academy's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM,

14   **Forced marriage**

14.1   Forced marriage is also a form of so-called "honour-based" abuse . Forcing a person into marriage is a crime in England and Wales. 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 or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

14.2 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.

14.3 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 39-44 of the Multi-agency guidelines: handling case of forced marriage (HM Government, April 2023).

14.4 Staff should speak to the DSL if they have any concerns. Pages 75-80 of the Multi-agency guidelines: handling case of forced marriage (HM Government, April 2023) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fco.gov.uk for advice and information.

15 **Radicalisation and the Prevent duty**

15.1 The Academy has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

15.2 The Academy aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The Academy is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

15.3 The Academy has adopted the government's definitions for the purposes of compliance with the Prevent duty:

15.4 **Extremism:** "*vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas*"

15.5 **Radicalisation:** "*the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups.*"

15.6 **Terrorism**: "*an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause.*"

15.7 Although there is no single way of identifying an individual who is likely to be susceptible an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may

contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

15.8   It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Academy staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, February 2021) The DfE and Home Office's briefing note The use of social media for online radicalisation (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

16   **Child-on-child abuse**

16.1   All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online.

16.2   The Academy's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.

17   **Online safety**

17.1   All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

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

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

17.3.1   **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;

17.3.2   **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

17.3.3 **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and / or pornography, sharing other explicit images and online bullying; and

17.3.4 **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils, students or staff are at risk, it should be reported to the Anti-Phishing Working Group.

18 **Sharing nudes and semi-nude images and videos**

18.1 Consensual and non-consensual sharing of nudes and semi-nude images and / or videos can be signs that children are at risk.

18.2 "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery.

18.3 The Academy treats all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.

18.4 Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images members of staff should describe the content of the images as reported to them.

18.5 The DSL may in exceptional circumstances view images with the prior approval of the Headteacher and only where:

18.5.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;

18.5.2 it is necessary to report the image to a website or, app or suitable reporting agency to have it taken down, or to support the pupil or parent in making a report; or

18.5.3 a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the academy's devices or network.

18.6 Where viewing an image is unavoidable:

18.6.1 viewing should take place on Academy premises wherever possible;

18.6.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

18.6.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;

18.6.4 full details of the viewing must be recorded in the Academy's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

18.6.5 any member of staff who views an indecent image should be given appropriate support.

18.7 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

18.8 If an electronic device that is prohibited by the Behaviour policy has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

18.9 If external agencies do not need to be involved, the Academy must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

18.10 If images have been shared online and cannot now be deleted by the person who shared them, the Academy should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

18.11 Where a pupil receives unwanted images, the Academy should advise the pupil and their parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

18.12 The UK Council for Internet Safety's advice note Sharing nudes and semi-nudes: advice for education settings working with children and young people (DfDCMS and UKCIS, December 2020) contains details of support agencies and provides further information for schools on how to responding to incidents of sexting.

19 **Upskirting**

19.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear), to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

19.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

19.3 The Academy will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the Academy's child protection procedures.

19.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

20 **Special educational needs and disabilities or physical health issues**

20.1 The Academy welcomes pupils with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the Academy's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the Academy's policy on special educational needs and learning difficulties and disability policy.

20.2 Additional barriers can exist when detecting the abuse or neglect of pupils with SEND or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The Academy is mindful in particular that:

20.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration;

20.2.2 pupils with SEND or certain health conditions may be more prone to peer group isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;

20.2.3 some pupils may be unable to understand the difference between fact and fiction in online content and can repeat the content / behaviour in school without understanding the consequences; and

20.2.4 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

20.3 The Academy should consider providing extra pastoral support and attention for these pupils, along with ensuring any appropriate support for communication is in place.

21 **Looked after children and previously looked after children**

21.1 The Governing Body ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:

21.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;

21.1.2 contact arrangements with birth parents or those with parental responsibility;

21.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after them.

21.2 The DSL maintains these details, including contact details of the child's social worker. See paragraph 6.6.4 of the policy for the DSL's role in relation to pupils who are looked after children.

22   **Care leavers**

22.1   The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

23   **Children who are lesbian, gay, bi or trans (LGBT)**

23.1   The Academy recognises that pupils who are or perceived to be LGBT are vulnerable to being targeted by other children.

23.2   LGBT inclusion is taught as part of the statutory relationships education / RSE / PSHE curriculum.

23.3   All staff are aware of these vulnerabilities and the Academy endeavours to provide a safe space to speak out or share concerns.

23.4   KCSIE 2024 is awaiting statutory guidance.

Appendix 2   Concerns about a child - guidance for staff

1   **Receiving a disclosure**

1.1   Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

1.2   Do not ask leading questions, i.e. a question which suggests its own answer. Use "tell me, explain to me, describe to me" (**TED**) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed - the police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.

1.3   Take the pupil to the DSL / DDSL if there is a medical need and do not examine the injury yourself.

1.4   Reassure the pupil they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

1.5   Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.

1.6   Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

1.7   Pass on the record when reporting the concern in accordance with this policy.

2   **Recording a concern**

2.1   Staff must record all concerns in writing via CPOMS.

2.2   Records should be factual. Any written copies of statements must be signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1   the pupil's details: name; date of birth; address and family details;

2.2.2   date and time of the event / concern / conversation;

2.2.3   a clear and comprehensive summary of the event/concern / conversation;

2.2.4   details of how the concern was followed up and resolved;

2.2.5   a note of any action taken and by whom, decisions reached and the outcome;

2.2.6   the name and position of the person making the record.

3   **Use of reasonable force**

3.1   There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. "Reasonable" in these circumstances means using no more force than is needed.

Appendix 3   Dealing with allegations of child-on-child abuse

1   **Child-on-child abuse**

1.1   Children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and / or outside school and / or online. This includes, but is not limited to:

1.1.1   bullying (including cyber-bullying and prejudice-based and discriminatory bullying);

1.1.2   abuse within intimate personal relationships between peers (teenage relationship abuse);

1.1.3   physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);

1.1.4   sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;

1.1.5   sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

1.1.6   causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

1.1.7   consensual and non-consensual sharing of nude and semi-nude images (also known as "sexting" or "youth produced sexual imagery") means the taking and sending or posting of nude or semi-nude images, videos or lives streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop;

1.1.8   upskirting, typically involving taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

1.1.9   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 include an online element);

2   **The Academy's approach to child-on-child abuse**

2.1   Staff understand that, even if there are no reports of child-on-child abuse at the Academy, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).

2.2   Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The Academy will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children and its worst to a culture that normalises abuse.

2.3   All staff should challenge inappropriate behaviour between pupils and anyone who suffers, witnesses or hears of abuse of any form between pupils is asked to report it in accordance with this policy and / or the school's behaviour and anti-bullying policies, so that appropriate action can be taken.

2.4   Appropriate action will involve supporting all members of the Academy community who may be involved as a priority. This may require investigation by the Academy or other agencies. Until investigations have been undertaken and findings made, the Academy will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at school, or when the pupil involved was under the Academy's care and whether or not the pupil is under 18, as an issue which may impact pupil welfare. Disciplinary action will follow separately, if appropriate.

3   **Sexual violence and sexual harassment (SVSH)**

3.1   Where the misconduct may constitute sexual violence[7] (rape, assault by penetration, sexual assault[8] or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.

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

3.3   SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.

3.4   The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The Academy acknowledges this and that children are likely to report such

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[7] When referring to sexual violence the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above

[8] Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom / breasts / genitalia without consent, can still constitute sexual assault).

matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4   Management of allegations of child-on-child SVSH

4.1   The initial report

4.1.1   The Academy recognises that it is not easy for children to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them; and to respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.

4.1.2   The Academy acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.

4.1.3   They should:

    (a)   listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its truth;

    (b)   where possible they should ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;

    (c)   where there is an online element, considering the searching, screening and / or confiscation of devices and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child[9];

    (d)   explain the next steps and how the report will be progressed;

    (e)   make a written record of the report (recording the facts as the child has presented them);

    (f)   inform the DSL (or deputy) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2   DSL's considerations

4.2.1   Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case by case basis taking all of the circumstances into account, in the best interest of the pupils involved. The Academy's response is led by the

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[9] School staff can search pupils with their co-operation for any item. If a pupil refuses to co-operate staff may use reasonable force to search pupils if they have reasonable grounds for suspecting a pupil is in possession of a prohibited item or is likely to be used to commit an offence or cause personal injury or damage to property. The decision to use reasonable force should be made on a case by case basis. See http://www.gov.uk/goverment/publications/searching -screening-and-confiscation for further information.

DSL who will always have regard to Part 5 of KCSIE in the management of the issue.

4.3 **The Academy's considerations**

4.3.1 The Academy will consider:

(a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the Academy may have to take action to protect other children;

(b) the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour[10] has been displayed;

(c) the ages and developmental stages of the children involved and any imbalance between them;

(d) if there is an intimate personal relationship between the children;

(e) whether there are any ongoing risks to those involved;

(f) the time and location of any incident, and any action required to make the location safer;

(g) the wider context.

4.3.2 Before deciding how best to support and protect those involved. The Academy will undertake:

(a) Immediate risk and needs assessments: these will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve suspension pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.

4.3.3 The Academy will make a proportionate response to these matters in light of the circumstances and the factors identified above and decide if any further action is appropriate.

4.3.4 The Academy will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

5 **Investigations and findings**

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[10] Hackett's sexual behaviours across a continuum table - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive or violent may be helpful here.

5.1   The Academy will record the findings of investigations undertaken by the police and / or the CPS, and if the police decide not to take any further action, will consider whether investigation should be undertake or commissioned by the Academy to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances whether this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the Academy should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.

5.2   The Academy should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether further referral and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and / or harmful sexual behaviours identified or the victim where concerns were found to be deliberately invented or malicious.

Appendix 4   Charity safeguarding procedures

1   **Charity safeguarding duties**

1.1   As charity trustees of an exempt charity and as Proprietor of the Academy, the Trustees acknowledge in addition to their statutory duties to safeguard and protect children and adults at risk, they have a duty to take reasonable steps to protect everyone associated with the Academy Trust from harm, abuse or mistreatment, whether working online or in person. This protection of the people involved in the Academy Trust is central to its culture. The full extent of these additional Safeguarding duties is set out in the Charity Commission guidance: Safeguarding and Protecting People for Charities and Trustees. This guidance lists risks to be aware of, including discrimination, health and safety, cyber abuse and data breaches.

1.2   The contents of the Academy's Safeguarding and data protection suites of policies, the staff handbook and the Health and safety policy set out how many concerns about these issues will be handled. If anyone has any Safeguarding concerns which have caused or may cause harm to anyone associated with the Academy Trust which are not expressly covered by those or other Academy policies, they should contact Emma Twell, Reach South Academy Trust Head of Safeguarding without delay.

1.3   The Trustees fulfil these duties by:

1.3.1   leading by example and promoting a fair, inclusive and positive culture, ensuring that everyone involved with the Academy Trust feels able to report any concerns they may have, confident that they will be heard and responded to;

1.3.2   setting and regularly (at least annually) reviewing the suitability of policies and procedures as a Board to ensure they remain fit for purpose and that they are followed in practice;

1.3.3   establishing appropriate delegation arrangements for the effective governance and management of safeguarding matters within the Academy Trust;

1.3.4   appointing a Designated Trustee with the required knowledge, skills and expertise or sufficiently qualified and experienced to take leadership responsibility across the Academy Trust;

1.3.5   exercising proper oversight of the management of individual Safeguarding matters and a review of the performance of the Academy Trust's Safeguarding function, including consultation with stakeholders and appropriate trend analysis;

1.3.6   being quick to respond to concerns, to carry out appropriate investigations and take necessary action;

1.3.7   being open and transparent and not ignoring harm or downplaying failures;

1.3.8   managing conflicts of interest and / or loyalty;

1.3.9   ensuring that staff receive training in Safeguarding at a level which is commensurate with their role;

1.3.10 having clear recruitment and contracting processes and ensuring that proper due diligence is undertaken on the suitability of:

(a) staff;

(b) partner organisations;

(c) contractors;

(d) beneficiaries;

(e) entering into any appropriate agreements with other third parties (whether those who provide services to the Academy Trust or directly to its beneficiaries (including pupils)) covering the relationship, their respective roles and monitoring and reporting requirements.[11]

1.3.11 reviewing its premises and security arrangements and arrangements for third party use to ensure appropriate measures are in place to keep people safe;

1.3.12 setting out risks and how it will manage them in a risk register and regularly monitoring and reviewing the risk register and as well as strategies to mitigate risk;

1.3.13 allocating sufficient funds for the effective management of Safeguarding and arranging appropriate insurance cover;

1.3.14 ensuring a sufficient level of oversight of the Academy Trust's operations to manage risk and report any incident to the ESFA as might be required in line with 'How to report a serious incident in your charity (Charity Commission, June 2019)

[11] https://www.gov.uk/goverment/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds

POLICY HISTORY

Policy Date	Summary of change	Contact	Implementation Date	Review Date
09/10/2023	New Policy	Emma Twell		
16/9/2024	Updates	Debbie Innes-Turnill		