



East Midlands
Education Trust

Safeguarding – Child Protection Policy

Autumn 2022

Review Date:	Autumn 2022	Reviewed & adopted by:	Trustees
Next Review Due:	Autumn 2023	Updated by:	A Turkson-Jones Safeguarding Officer
Mid-Reviews (<i>statutory</i>):	Section 47: replaced reference to 'DfE guidance on sexual violence and sexual harassment between children in schools 2021' with 'KCSiE 2022 Part Five' (27/9/2022).		
Document No:	POL-OPS-001	The information contained on this document is considered proprietary to East Midlands Education Trust in that these items and processes were developed at private expense. This information shall not be released, disclosed, or duplicated.	

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1 Safeguarding contacts

Designated safeguarding lead for Child Protection

Lisa Turner-Rowe – Headteacher
head@cjs.derby.sch.uk

Designated deputy safeguarding leads for Child Protection	Jayne Deane-Robson – Learning Mentor Karen Price – Deputy Head Teacher Kate Ballington – Assistant Head Teacher Steve Beeston – Assistant Head Teacher Charlotte Busby – Assistant Head Teacher Sarah Woolley – The Zone Manager
Designated governor for Child Protection	Keir Mather
Designated teacher for Looked After Children	Lisa Turner-Rowe - Headteacher
Local Authority Safeguarding Partner Lead	Locality 2 Lead Practitioner Children's Services Professional Consultation Line 07812300329
Multi-Agency Safeguarding Hub (MASH)	Derby and Derbyshire Safeguarding Children Partnership www.ddscp.org.uk/
Emergency Duty Team (Children’s Social Care)	Children's Social Care and the First Contact Team Monday to Friday, between 9-5pm. Telephone: 01332 641172 At all other times concerns can be discussed with Careline . Concerns which are not urgent can be raised using our online form .
Local Police Safeguarding Partner Lead	Police Emergency 999 Police Non-emergency 101
Trust Safeguarding Lead	Aune Turkson-Jones aturkson-jones@emet.uk.com
Safeguarding Trustees	Kate Foale kfoale@emet.uk.com Ann Witheford awitheford@emet.uk.com

2 Appendices

The following appendices are part of this policy:

Appendix A	Roles and responsibilities
Appendix B	Identifying concerns
Appendix C	Confidentiality
Appendix D	Protocol for visitors to school
Appendix E	Prevent strategy
Appendix F	Child-on-child abuse sexual violence and Harassment
Appendix G	Consensual and non-consensual sharing of nude and semi-nude images and/or videos
Appendix H	Child criminal and child sexual exploitation (CCS/CSE) policy
Appendix I	Domestic abuse
Appendix J	Female genital mutilation
Appendix K	Honour-based abuse
Appendix L	Forced marriage
Appendix M	Private fostering
Appendix N	Children missing education (CME)
Appendix O	Local authority guidance on children missing in education
Appendix P	Sexual violence and sexual harass
Appendix Q	Children staying with host families
Appendix R	Online safety
Appendix S	Mental health

Appendix T	Managing allegations made about staff, incl. supply teachers, volunteers & contractors
Appendix U	Low level concerns form
Appendix V	Police and Criminal Evidence Act

3 Links to other policies

This policy, together with the following, should be read alongside and in conjunction with other policies regarding the safety and welfare of children. These together make up the suite of policies to safeguard and promote the welfare of children in our schools. The majority of these policies can be found on either the school or trust websites or available from the school office.

- Anti-bullying
- Attendance
- Behaviour Management
- Contact between staff and students
- Complaints
- Equality
- Drugs
- E-Safety
- Physical intervention
- Safeguarding – Safer Recruitment
- Visits (educational)
- Staff Code of Conduct
- RSE and Health-Mental Wellbeing
- SEND
- Health and Safety
- First Aid in schools
- Curriculum
- Whistleblowing

4 Links to Local Authority Policies

- Pathway to Provision
- Guidance where children are at risk of missing education
- Escalation Policy
- Interagency Safeguarding Children Procedures of the local authority safeguarding children partners.

5 A whole Trust policy for child protection and to safeguard and promote the welfare of children

- 5.1 The Trust recognises its responsibilities for safeguarding children and protecting them from harm. This policy will be reviewed annually by Trustees.

6 Commitment

- 6.1 Our policy applies to all staff, governors and volunteers working in our schools and takes into account statutory guidance provided by the Department for Education and local guidance issued by the Three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for our local authority area).
- 6.2 We will ensure that all parents/carers are made aware of our responsibilities with regard to child protection procedures and how we will safeguard and promote the welfare of their children through the publication of this Trust's Safeguarding and Child Protection policy.
- 6.3 "Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child." Keeping Children Safe in Education 2022.
- 6.4 Our schools and Colleges, as relevant agencies participate in discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.
Safeguarding partners publish a local threshold document: Derby City and Derbyshire Safeguarding Children Partnership document can be accessed [here](#).
All designated safeguarding leads (and their deputies) familiarise themselves with the threshold document.
- 6.5 These duties and responsibilities as set out within the Education Act 2002 sec 175 and 157, DfE Statutory Guidance Keeping Children Safe in Education 2022 and HM Working Together to Safeguard Children 2018 which are incorporated into this policy.

7 Safeguarding

- 7.1 **Safeguarding children definition:** The actions we take to promote the welfare of children and protect them from harm are everyone's responsibility. Everyone who comes into contact with children and families has a role to play. NB: Children includes everyone under the age of 18.
- 7.2 **Safeguarding and promoting the welfare of children is defined as:**
 - 7.2.1 Protecting children from maltreatment.
 - 7.2.2 Preventing impairment of children's mental and physical health or development.
 - 7.2.3 Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
 - 7.2.4 Taking action to enable all children to have the best outcomes
 - 7.2.5 Keeping Children Safe in Education 2022 page 6
- 7.3 **Safeguarding is not just about protecting children from deliberate harm. It also relates to broader aspects of care and education including:**
 - 7.3.1 Pupils' health and safety and well-being, including their mental health
 - 7.3.2 Meeting the needs of children with special educational needs and/or disabilities
 - 7.3.3 The use of reasonable force.
 - 7.3.4 Meeting the needs of children with medical conditions.
 - 7.3.5 Providing first aid.
 - 7.3.6 Educational visits.
 - 7.3.7 Intimate care and emotional well-being

- 7.3.8 Online safety and associated issues
- 7.3.9 Appropriate arrangements to ensure school security, taking into account the local context.

7.4 **Safeguarding can involve a range of potential issues such as:**

- 7.4.1 Neglect, physical abuse, sexual abuse and emotional abuse
- 7.4.2 child on child abuse (formerly known as peer on peer abuse)
- 7.4.3 Bullying, including online bullying (by text message, on social networking sites etc.) and prejudice based bullying
- 7.4.4 Racist, disability and homophobic or transphobic abuse.
- 7.4.5 Extremist behaviour and/or radicalisation
- 7.4.6 Child sexual exploitation and child criminal exploitation
- 7.4.7 The impact of new technologies, including consensual and non-consensual sharing of nude and semi-nude images and videos (formerly known as sexting and youth produced sexual imagery)
- 7.4.8 Substance misuse.
- 7.4.9 Issues which may be specific to a local area or population, for example gang activity and youth violence (County Lines)
- 7.4.10 Sexual violence and/or sexual harassment
- 7.4.11 Homelessness
- 7.4.12 Particular issues affecting children including domestic violence, honour based abuse, female genital mutilation and forced marriage
- 7.4.13 'Up skirting' – a criminal offence from 2019
- 7.4.14 Experiencing or developing a mental health problem
- 7.4.15 Involvement in serious violence

7.5 Our ethos demonstrates that the effective safeguarding of children can only be achieved by putting children at the centre of a system where we listen and hear what they say. Every individual within the Trust will play their part, including working with professionals from other agencies to meet the needs of our most vulnerable children and keep them safe. We will take opportunities to teach children about important safeguarding issues in a way that is age appropriate.

7.6 Our schools, therefore, aim to provide a safe environment and a vigilant culture where children and young people can learn and be safeguarded. If there are safeguarding concerns we will respond with appropriate action in a timely manner for those children who may need help or be suffering, or likely to suffer, significant harm.

7.7 Where staff members have concerns about a child (as opposed to a child being in immediate danger), they will decide what action to take in conjunction with the designated safeguarding lead. Concerns can be raised directly with Children's Social Care but we would advocate contact with the designated safeguarding lead first. Where a child is identified as being in immediate danger then there should be no delay in reporting the concerns to Children's Social Care, MASH or the Police as required.

7.8 The designated safeguarding lead who is familiar with national and local guidance will share concerns, where appropriate, with the relevant agencies.

8 Our Safeguarding and Child Protection Policy

8.1 **There are five main elements to our policy:**

- 8.1.1 Providing a safe environment in which children can learn and develop.
- 8.1.2 Ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with children.
- 8.1.3 Developing and then implementing procedures for identifying and reporting cases, or suspected cases of abuse.
- 8.1.4 Supporting pupils who have been abused or harmed in accordance with his/her child protection plan.
- 8.1.5 Raising awareness of safeguarding children, child protection processes and equipping children with the skills needed to keep them safe.

8.2 We recognise that because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. Our schools will therefore:

- 8.2.1 Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to and heard.
- 8.2.2 Ensure children know that there are adults in school who they can approach if they are worried.
- 8.2.3 Ensure that every effort is made to establish effective working relationships with parents/carers and colleagues from other agencies.
- 8.2.4 Include opportunities in the PSHE (Personal, Social and Health Education) (or whatever course a school has as its equivalent) curriculum for children to develop the skills they need to recognise and stay safe from abuse:
 - Availability of local and online advice including at primary level, accessing the NSPCC online and in school training for children.
 - Recognising and managing risks, including online, sexual exploitation, consensual and non-consensual sharing of nude and semi-nude images and/or videos and running away, as well as radicalisation.
 - Developing healthy relationships and awareness of domestic violence, bullying and abuse.
 - Recognising how pressure from others can affect their behaviour.
 - Knowing that we will act swiftly to address any concerns related to serious violence, gang and knife crime or child on child sexual violence or sexual harassment incidents.
- 8.2.5 Take all reasonable measures to ensure risks of harm to children's welfare are minimised.
- 8.2.6 Take all appropriate actions to address concerns about the welfare of a child, working to local policies and procedures in full working partnership with agencies.
- 8.2.7 Ensure robust child protection arrangements are in place and embedded in the daily life and practice of our schools.
- 8.2.8 Promote pupil health and safety.
- 8.2.9 Promote safe practice and challenge unsafe practice.
- 8.2.10 Ensure that procedures are in place to deal with low level concerns and allegations of abuse against teachers and other staff including volunteers (DfE Keeping Children Safe in Education 2022, page 85-101) and the local multi-agency procedures.
- 8.2.11 Provide first aid and meet the health needs of children with medical conditions.
- 8.2.12 Ensure site security in our schools.
- 8.2.13 Address drugs and substance misuse issues. Support and plan for young people in custody and their resettlement back into the community

- 8.2.14 Work with all agencies with regard to missing children, anti-social behaviour/gang activity and violence in the community/knife crime and children at risk of criminal and/or sexual exploitation
- 8.2.15 Recognise that everyone has a duty to safeguard children inside/outside the school environment including school trips, extended school activities, vocational placements and alternative education packages
- 8.2.16 Take into account contextual safeguarding and consider the context within which incidents and/or behaviours occur.

8.3 We will follow the procedures set out by the Derby City and Derbyshire Safeguarding Children Partnership and take account of guidance issued by the DfE (Department for Education) in Keeping Children Safe in Education, 2022 to:

- 8.3.1 Ensure we have a designated safeguarding lead and a deputy safeguarding lead in each school for child protection who has received appropriate training and support for this role.
- 8.3.2 The designated safeguarding lead role is written into their job description and clarifies the role and responsibilities included (as defined in KCSIE 2022Annex C).
- 8.3.3 Ensure we have a nominated, suitably trained governor responsible for child protection in each school and a named, suitably trained trustee responsible for safeguarding.
- 8.3.4 Ensure that we have a designated teacher for looked after children in each school.
- 8.3.5 Ensure every member of staff (including temporary and supply staff and volunteers) and governing bodies know the name of their designated safeguarding lead (and their deputy) responsible for child protection and their role.
- 8.3.6 Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated safeguarding lead or to children's social care/police if a child is in immediate danger.
- 8.3.7 Ensure all staff and volunteers are aware of the early help process and understand their role in it.
- 8.3.8 Ensure that there is a whistleblowing policy and culture where staff can raise concerns about unsafe practice and that these concerns will be taken seriously.
- 8.3.9 Ensure that there is a complaints system in place for children and families.
- 8.3.10 Ensure that parents have an understanding of the responsibility placed on their school and staff for child protection by setting out its obligations in the school prospectus.
- 8.3.11 Notify children's social care if there is an unexplained absence of a child who is subject to a child protection plan and where no contact can be established with the child or a parent or appropriate adult linked to the child.
- 8.3.12 Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at child protection conferences.
- 8.3.13 Keep written/electronic records of concerns about children, even where there is no need to refer the matter immediately; documenting and collating information on individual children to support early identification, referral and actions to safeguard.
- 8.3.14 Ensure all written/electronic records are kept securely; separate from the main pupil file and in locked locations.
- 8.3.15 Ensure that we follow robust processes to respond when children are missing from education or missing from home or care.
- 8.3.16 Ensure that where reasonably possible the school holds more than one emergency contact number for each pupil.
- 8.3.17 Where a pupil is placed with an alternative provision provider the school continues to be responsible for the safeguarding of the pupil and will ensure that written confirmation is

obtained that appropriate safeguarding checks have been carried out on individuals working at the establishment.

- 8.3.18 Develop and then follow procedures where an allegation is made against a member of staff (including supply staff) or volunteers.
- 8.3.19 Ensure safe recruitment practices are always followed ([EMET Safeguarding Safer Recruitment Policy](#)).
- 8.3.20 Apply confidentiality appropriately.
- 8.3.21 Apply the local authority safeguarding child protection escalation procedures if there are any concerns about the actions or inaction of social care staff or staff from other agencies.

8.4 Supporting children

8.4.1 We recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. A school may be the only stable, secure and predictable element in the lives of children at risk. When at school, their behaviour may be challenging and defiant or they may be withdrawn. We also recognise that there are children who are more vulnerable than others, which includes children with special educational needs and/or disabilities. Our schools will endeavour to support the pupil through:

- a. The content of the curriculum.
- b. A school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- c. A school behaviour policy, which is aimed at supporting vulnerable pupils in school. Schools in the Trust will ensure that their pupils know that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- d. Liaison with other agencies that support the pupil such as children's social care (in line with Local Authority guidance) and Educational Psychology Service.
- e. Ensuring that, where a pupil leaves and is subject to a child protection plan or where there have been wider safeguarding concerns, their information is transferred to the new school immediately and that the child's social worker is informed.
- f. Ensuring that the vulnerability of children with special educational needs and/or disabilities is recognised.

8.4.2 Children who are lesbian, gay, bisexual, transgender or questioning (LGBTQ+)

We acknowledge that children and young people who are LGBTQ+, or perceived to be, may be at greater risk of harm.

- Being LGBTQ+ in itself doesn't put them at greater risk, but they may be targeted by their peers, or might not have a trusted adult they can talk to.
- We will endeavour to provide a safe space in our schools, for pupils to speak out, or share their concerns.
- LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health curriculum provided in our schools.

8.5 Early Help

- 8.5.1 All Staff (anyone who has contact with a child or young person including governors and volunteers) are made aware of what Early Help means, how to identify emerging needs and understanding their role within it. This means sharing information and having discussions with the Designated Safeguarding Lead, liaising with other professionals and supporting children identified in the school (i.e. potentially vulnerable and those who are vulnerable) who may therefore need Early Help intervention.
- 8.5.2 The provision of Early Help Services should form part of a continuum of help and support to respond to the different levels of need of individual children and their families.
- 8.5.3 When providing early help, each school can demonstrate they have a framework and structures to support the work including information sharing, procedures around step up into social care, robust recording and advice, and support to staff in early help activity.
- 8.5.4 Early Help Arrangements:

Notifying parents

The school will normally seek to discuss any needs or concerns about a child with their parents or carers. This must be handled sensitively. Where an Early Help Assessment would benefit the child and their family the most appropriate member of staff should approach the parent/carer to take this forward. In situations where there are serious needs or child protection concerns the Designated Safeguarding Lead (DSL) will make contact with the parent or carer. However, if the setting believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Children's Social Care.

Getting early help for the child

If a referral to Social Care is not considered appropriate, consideration should be made to what support the child and family needs. The school will consider what support could be offered within the setting via pastoral support processes or whether it may be useful to undertake an Early Help Assessment (EHA) to clarify the child's needs/strengths and the support required and/or make a referral for other services.

Full written records of the information that the Designated Safeguarding Lead (DSL) or deputy received, detailing the actions taken or not taken and the reasons for these will be made. See [Derby Education Providers Safeguarding/Child Protection File Guidance](#).

Using the [Early Help Assessment \(EHA\)](#)

Where parents, carers or children tell us that they require support, or staff identify that there may be emerging needs and that services might be required an Early Help Assessment (EHA) is likely to be beneficial. In such cases staff will have an open discussion with the parents / carers and child about the support and services that might help and agree how they would be accessed.

Extra support (universal)

Where the school and another service i.e. Derby early help offer to schools, may be able to meet the needs, take swift action and prevent needs escalating, the Early Help Assessment (EHA) pre-assessment will be completed to identify and document the needs. This process may identify that an Early Help Assessment may be needed and the action to be taken.

Emerging needs

Where the child or parent are likely to require co-ordinated support from a range of early help services, or where there are concerns for a child's well-being or a child's needs are not clear, not known or not being met, staff should discuss the use of the Early Help Assessment with the child and /or their parents or carers. Where a multi-agency response is needed a Team Around the Family (TAF) should be formed to bring together practitioners from the different services so that they, along with the family, can work together to meet the child's needs. The Designated Safeguarding Lead (DSL) or deputy will generally lead on liaising with other agencies, setting up the inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as lead professional.

For more information about the Early Help Assessment process see the DDSCP [Early Help](#) webpage or DDSCP safeguarding children procedures; [Providing early help](#).

If Early Help and/or other support are appropriate, the case should be kept under constant review. At each stage of the process where the child's situation doesn't appear to be improving and complex needs requiring intensive support (via Multi-Agency Team/MAT) or enduring complex needs (child in need) or child protection concerns are identified requiring specialist support, a referral to Children's Social Care will be made.

9.0 All staff and volunteers

- 9.1 Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone in our schools who come into contact with children and their families have a role to play in safeguarding children. All staff in our schools consider, at all times, what is in the best interests of children.
- 9.2 All staff within our schools are particularly important as they are in a position to identify concerns early and provide help to children to prevent concerns from escalating. All staff contribute to providing a safe environment in which children can learn.
- 9.3 All our staff are aware of the early help process and understand their role in this, this includes being able to identify emerging problems to recognise children who may benefit from early help. Staff know in the first instance to discuss their concerns with the designated safeguarding lead and understand they may be required to support other agencies and professionals in assessments for early help.
- 9.4 All our staff are aware of systems within The Trust, and are explained to them as part of their staff induction, which includes our Safeguarding and Child Protection policy, the employee Code of Conduct, Pupil Behaviour Policy and the role and names of the designated safeguarding lead and deputies and Keeping Children Safe in Education Part One. School leaders and staff who work directly with children must also read Annex A of Keeping Children Safe in Education 2022.
- 9.5 All our staff receive safeguarding and child protection training which is updated every three years. In addition to this training, all staff members receive child protection and safeguarding updates when required, but at least annually.
- 9.6 All our staff are aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 and understand the role they may have in these assessments.
- 9.7 All our staff know what to do if a child is raising concerns, or makes a disclosure of abuse and/or neglect. Staff will maintain a level of confidentiality whilst liaising with the designated safeguarding lead and children's social care. Our staff will never promise a child that they will not tell anyone about a disclosure or allegation, recognising this may not be in the best interest of the child.
- 9.8 All our staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and that children may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from exercising their professional curiosity and speaking to the DSL, if they have concerns about a child. All staff will determine how best to build trusted relationships with our pupils and young people, which facilitate communication.

10.0 Teachers (including ECTs and Head teachers) – Professional Duty

10.1 The Teachers' Standards 2012 remind us that teachers, newly qualified, now known as early career teachers and head teachers should safeguard children and maintain public trust in the teaching profession as part of our professional duties. (This is re-enforced in Trust appraisal and pay policies where 'EMET Teacher standards' align with national Teachers' standards 2012.)

11.0 Designated Safeguarding Lead

11.1 We have a designated safeguarding lead in all our schools who takes lead responsibility for safeguarding children and child protection who has received appropriate training and support for this role. This designated safeguarding lead is a senior member of the school leadership team and their responsibilities are explicit in their job description.

11.2 We also have at least one deputy safeguarding lead in all our schools, who will provide cover for the designated safeguarding lead when they are not available. Our deputy safeguarding leads have received the same training as our designated safeguarding lead. They will provide additional support to ensure responsibilities for child protection and safeguarding children are fully embedded within their school's ethos, and that specific duties are discharged. They will assist the designated safeguarding lead in managing referrals, attending child protection conferences and supporting the child/children.

11.3 We acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils. Each designated safeguarding lead will ensure there is a structured procedure within their school, which will be followed by all of the members of the school community in cases of suspected abuse.

12.0 Extra-familial Harm

12.1 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (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 exploitation, criminal exploitation, and serious youth violence.

12.2 Our staff will be alert to the potential needs for early help for a child who

- a. Is disabled and has specific additional needs
- b. Has special educational needs (whether or not they have a statutory education, health and care plan (EHCP))
- c. Is a young carer
- d. Is showing signs of being drawn into anti-social behaviour, including gang involvement and association with organised crime groups
- e. Is frequently missing/goes missing from care or from home
- f. Is misusing drugs or alcohol themselves
- g. Is at risk of modern-day slavery, trafficking or exploitation
- h. Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse

- i. Has returned home to their family from care
- j. Is showing early signs of abuse and/or neglect
- k. Is at risk of being radicalised or exploited
- l. Has an age inappropriate understanding of sexualised behaviours
- m. Is privately fostered
- n. Misusing drugs or alcohol themselves
- o. Not attending school or at risk of exclusion from school
- p. Not in education, employment or training after the age of 16 (NEET)

12.3 All our staff are aware they must always act in the 'best interest of the child' and report or refer concerns in accordance with our policies and procedures.

13.0 **The Designated Safeguarding Lead is expected to:**

13.1 **Manage Referrals**

- a. Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- b. Support staff who make referrals to children's social care and other referral pathways.
- c. Refer cases where a person is dismissed or left due to risk/harm to a child and the DBS is required.

13.2 **Work with others**

- a. Liaise with the Principal/Head Teacher (where the designated senior safeguarding lead role is not carried out by the head teacher) to inform him/her of any issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult present. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)
The guidance is summarised in Appendix V.
- b. Liaise with staff on matters of safety and safeguarding and deciding when to make a referral by liaising with other agencies. Act as a source of support, advice and expertise for other staff
- c. Take part in strategy discussions or attend inter-agency meetings and/or support other staff to do so and to contribute to the assessment of children.
- d. Liaise with the local authority and other agencies in line with Working Together to Safeguard Children 2018.

13.3 **Undertake training**

13.3.1 Formal designated safeguarding lead training will be undertaken every two years. Informal training and updating of knowledge and skills will be at regular intervals, undertaken at least annually. The designated safeguarding lead is responsible for their own training and should obtain access to resources or any relevant refresher training.

13.3.2 The training undertaken should enable the designated safeguarding lead to:

- a. Understand the assessment process for providing early help and intervention through the Local Authority mechanisms.
- b. Have a working knowledge of how the Local Authority's Safeguarding Partners operates, the conduct of a child protection conference, and be able to attend and contribute to these effectively when required to do so.
- c. Ensure that each member of staff has access to the Safeguarding and Child Protection policy and procedures
- d. Be alert to the specific needs of children in need, including those with special educational needs and or disabilities and young carers
- e. Be able to keep detailed, accurate, secure written records of concerns and referrals.
- f. Understand the Prevent Duty and provide advice and support to staff on protecting children from the risk of radicalisation.
- g. Understand the reporting requirements for FGM.
- h. Encourage a culture of protecting children; listening to children and their wishes and feelings.

13.4 **Raise awareness**

- a. Ensure that the child protection policies are known, understood and used appropriately
- b. Ensure that the Safeguarding and Child Protection policy is reviewed annually, procedures and implementation are updated and reviewed regularly and work with the Trust regarding this
- c. Work strategically to ensure policies and procedures are up-to-date and drive and support development work within our schools.
- d. Ensure that the Safeguarding and Child Protection policy is available to parents and carers and make parents/carers aware that referrals may be made about suspected abuse or neglect
- e. Liaise with the Local Authority Safeguarding Partners and ensure all staff receive induction training covering child protection and are able to recognise and report any concerns immediately as they arise.

13.5 **Child protection file**

The designated safeguarding lead is responsible for ensuring that where children leave their school or college, the child protection file is transferred to the new school or college as soon as possible ensuring secure transit and confirmation of receipt is obtained. The child protection file will be transferred separately from the main pupil file. The designated safeguarding lead of the transferring school will also consider whether it would be appropriate to share information with a new school in advance of a pupil leaving.

13.6 **Availability**

During term time the designated safeguarding lead (or a deputy) are always available (during school hours) for staff in the school or college to discuss any safeguarding concerns. Appropriate arrangements are put in place for out of school hours' activities.

13.7 Training

13.7.1 The CEO will ensure that:

- a. The policies and procedures adopted by the Trust are fully implemented and followed by all staff.

13.7.2 The Principal/Head Teacher of each school will ensure that:

- a. The policies and procedures devolved to their local governing body are fully implemented and followed by all staff.
- b. The school has an up-to-date Single Central Record (SCR) which is reviewed regularly and is compliant with statutory guidance.
- c. Liaise with the case manager and the Local Authority Designated Officer where there are concerns about a staff member
- d. Refer cases where a person is dismissed or left due to risk/harm to a child and the DBS as required
- e. That the curriculum will implement sex, relationship and health education (RSE in secondary schools and RE in primary schools) teaching and make the best use of PSHE to cover safeguarding issues with children in line with the statutory obligations 2020
- f. Sufficient resources and time are allocated to enable the senior designated person and other staff to discharge their responsibilities, including taking part in strategy discussions and inter-agency meetings, and contributing to the assessment of children.
- g. All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with the agreed Whistleblowing policy. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them including the NSPCC helpline 0800 028 0285 (8AM – 8PM) Monday – Friday and email help@nspcc.org.uk.
- h. The Principal/Head Teacher will ensure all staff have access to and read the whole school Safeguarding and Child Protection policy, the Employee Code of Conduct, the Pupil Behaviour Policy, Contact between Staff and Pupils outside the usual work context policy and the DfE Keeping Children Safe in Education Guidance 2022 Part One and Annex A, as a minimum and are aware of the role and names of the designated safeguarding leads and their deputies.
- i. The Principal/Head Teacher will ensure there are mechanisms in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of Keeping Children Safe in Education 2022.

13.7.3 Trustees

Trustees are collectively responsible for ensuring that safeguarding arrangements are fully embedded within the ethos of all our schools and reflected in each school's day-to-day safeguarding practices by:

- a. Ensuring there is an individual member of a local governing body to take leadership responsibility for safeguarding and champion child protection issues within their school.

- b. Ensuring each school has effective policies and procedures in line with statutory guidance (*Working Together to Safeguard Children 2018*) as well as with local Safeguarding Partners guidance and the means to monitor their school's compliance with them.
- c. Ensuring that safeguarding policies and procedures are in place for *appropriate* action to be taken in a *timely* manner to promote a child's welfare
- d. Recognising the importance of information sharing between agencies. Ensuring cooperation with the local authority and other safeguarding partners.
- e. Appointing a designated safeguarding lead from the leadership team to take lead responsibility for safeguarding and child protection and a designated teacher for looked after children, who is appropriately trained.
- f. Ensuring that all staff and governors read at least part one of *Keeping Children Safe in Education 2022* as a minimum and ensure that there are mechanisms in place to assist staff to understand and discharge their role and responsibilities as set out in part one.
- g. Ensuring that the local governing body understands it is collectively responsible for their school's safeguarding arrangements. All new governors and trustees will receive appropriate safeguarding and child protection training on induction. All Safeguarding governors and trustees will have access to annual safeguarding training (including online). This will equip them with the knowledge to effectively provide strategic challenge to test a school's safeguarding practices and ensure that schools are robust in all of their safeguarding arrangements. Equally, governors will be enabled to tailor their support for a school's safeguarding procedures accordingly.
- h. Ensuring there is a training strategy in place for all staff, including the Principal/Head Teacher, so that child protection training is undertaken with refresher training at three yearly intervals. The designated safeguarding lead should receive refresher training at two yearly intervals.
- i. Ensuring that staff undergo safeguarding child protection training at induction and there are arrangements in place for staff to be regularly updated to ensure that safeguarding remains a priority.
- j. Ensuring that temporary staff and volunteers who work with children are made aware of that school's arrangements for child protection and their responsibilities. (Reminder that DBS checks on volunteers are free)
- k. Ensuring that there are procedures in place to manage allegations against staff. Exercising their disciplinary functions in respect of allegations against a member of staff or as a consequence of dealing with a complaint.
- l. Ensuring a response if there is an allegation against the Principal/Head Teacher by liaising with the LADO (Local authority designated officer) or other appropriate officers within their local authority.
- m. Ensuring appropriate responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, including child sexual exploitation and to help prevent the risks of their going missing in future.
- n. Ensuring that appropriate filters and monitoring systems are in place to protect children online. Regularly review the effectiveness of a school's systems. Ensure that the leadership team and relevant staff have an awareness and understanding of what is in place, manage them effectively and understand how to escalate concerns when identified. Governors should consider the age range of children, number of children, how often they access IT and the proportionality of costs, versus safeguarding risks.
- o. Ensuring that children learn about safeguarding online through teaching and learning opportunities.

- p. Giving staff the opportunities to contribute and shape safeguarding arrangements and policy.
- q. Prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, making decisions about additional checks and ensuring volunteers are supervised, as required.
- r. Ensuring at least one person on any appointment panel has undertaken safer recruitment training.
- s. Recognising that certain children are more vulnerable than others such as looked after children and children with special educational needs and disabilities.
- t. Be open to accepting that child abuse and incidents can happen within the school and be available to act decisively upon them.
- u. Ensuring that governing bodies are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. KCSIE 2022 (pages 24-26)

13.8 Looked After Children – the role of the Designated teacher and the Designated Safeguarding Lead

- 13.8.1 A teacher is appointed who has responsibility for promoting the education achievement of children who are looked after. They have the appropriate training. The designated teacher will work with the Virtual School Head to ensure that the progress of the child is supported.
- 13.8.2 In line with the Children and Social Work Act 2017 designated teachers also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.
- 13.8.3 The designated safeguarding lead will also have details of the child’s social worker and the name of the virtual head. The designated safeguarding lead will work closely with the designated teacher as we recognise that children may have been abused or neglected before becoming looked after and we need to ensure their ongoing safety as well as supporting their education and development by linking with the designated safeguarding lead, their social worker and parents where appropriate.

- 14.0 All members of staff, volunteers and the designated governor for child protection will know how to identify pupils who may be being harmed and then how to respond to a pupil who discloses abuse, or where others raise concerns about them. Our staff will be familiar with procedures to be followed.

Staff understand that abuse, neglect and safeguarding issues are rarely standalone events covered by one definition and that in most cases multiple issues will overlap with each other.

Staff who regularly come into contact with children are aware of the DfE guidance **What to do if you're Worried a Child is Being Abused**

- 14.1 Some of the following signs might be indicators of abuse or neglect:

- a. Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- b. Children with clothes which are ill-fitting and/or dirty;
- c. Children with consistently poor hygiene;
- d. Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- e. Children who don't want to change clothes in front of others or participate in physical activities;
- f. Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- g. Children who talk about being left home alone, with inappropriate carers or with strangers;
- h. Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- i. Children who are regularly missing from school or education;
- j. Children who are reluctant to go home after school;
- k. Children with poor school attendance and punctuality, or who are consistently late being picked up;
- l. Parents who are dismissive and non-responsive to practitioners' concerns;
- m. Parents who collect their children from school when drunk, or under the influence of drugs;
- n. Children who drink alcohol regularly from an early age;
- o. Children who are concerned for younger siblings without explaining why;
- p. Children who talk about running away; and
- q. Children who shy away from being touched or flinch at sudden movements.

- 14.2 The four categories of child abuse are as follows:

- a. Physical Abuse
- b. Emotional Abuse
- c. Sexual Abuse, and
- d. Neglect

11.0 Physical Abuse - a form of abuse that 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.

May be recognised by: Children with frequent injuries, injury such as bruising, bite marks, burns and scalds, fractures but also by aggressive behaviour. It may also be an indicator of concern where a parent gives an explanation inconsistent with the injury or gives several different explanations for the injury.

12.0 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 imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

12.1 It may involve serious bullying (including cyberbullying), 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.

May be recognised by: Developmental delay, attachment issues, aggressive behaviour, appeasing behaviour, watchfulness or stillness, low self-esteem, withdrawn or a loner, or having difficulty in forming relationships. Emotional abuse may be difficult to recognise as signs are usually behavioural rather than physical. Signs of emotional abuse may be associated or similar to other forms of abuse so presence of emotional abuse may indicate other abuse is prevalent as well.

13.0 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

May be recognised by: Inappropriate sexualised conduct, age inappropriate sexualised play or conversation, sexually harmful behaviour – contact or non-contact, self-harm, eating disorders, continual, inappropriate or excessive masturbation, anxiousness or unwillingness to remove clothes – sports / PE etc, pain or itching in genital area, blood on underclothes, bruising in genital region and / or inner thighs etc.

14.0 **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 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.

May be recognised by: Being constantly hungry; constantly tired; have a poor state of clothing; be emaciated; have untreated medical problems; be frequently late or have poor or non-attendance at school; have low self-esteem; display neurotic behaviour and/or have poor social relationships, have poor personal hygiene. A neglected child may also be apathetic, fail to thrive or be left with or in the care of adults under the influence of alcohol or drug misuse.

15.0 **Children with Special Educational Needs** - we recognise that children with special educational needs (SEN) and or disabilities can face additional safeguarding challenges. Children with SEN and/or disabilities are especially vulnerable when identifying concerns due to their impaired capacity to resist or avoid abuse. They may have speech, language and communication needs, which may make it difficult to tell others what is happening.

15.1 This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children which include:

- a. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- b. children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- c. communication barriers and difficulties in overcoming these barriers.

16.0 **Serious violence** - All staff should be aware of indicators, which may signal that children are at risk from, or are involved in serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

16.1 All staff should be aware of the associated risks and understand the measures in place to manage these. Further advice for schools can be found in the Home Office's 'Preventing youth violence and gang involvement' and 'Criminal exploitation of children and vulnerable adults: county lines' guidance.

17.0 Taking action where concerns are identified

- 17.1 Our staff recognise the difference between concerns about a child and a child in immediate danger. If staff have concerns about a child, they will need to decide what action to take. Where possible, a discussion will take place with the designated safeguarding lead to agree a course of action.
- 17.2 Where there are concerns about children displaying sexually harmful behaviour reference will be made to the [Stop it Now](#) Sexual Behaviours Traffic Light Tool, How to tell if a child's sexual behaviour is age appropriate or the [Brook Traffic Light tool](#) in order to determine whether a behaviour might be normal in terms of a child's development. The school will evidence in the pupil file when the tool has been used and the conclusions drawn. This assessment will be kept under review. If after using these resources a concern remains or support is required to reach a judgement on further action MASH will be contacted.
- 17.3 If a child is in immediate danger or risk of harm a referral will be made immediately to the Multi-Agency Safeguarding Hub (or equivalent) and/or the Police immediately. In this case, a referral will be made by the member of staff if required, with the designated safeguarding lead being informed of the referral.
- 17.4 Our staff recognise that children are vulnerable to abuse by their peers. Such abuse will be taken seriously by staff and will not be dismissed.
- 17.5 If a child chooses to tell a member of staff about alleged abuse, there are a number of actions that staff will undertake to support the child:
- a. The key facts will be established in language that the child understands and the child's words will be used in clarifying/expanding what has been said.
 - b. No promises will be made to the child, e.g. to keep secrets.
 - c. Staff will stay calm and be available to listen.
 - d. Staff will actively listen with the utmost care to what the child is saying.
 - e. Where questions are asked, this should be done without pressurising and only using open questions:
 - Leading questions should be avoided as much as possible.
 - Questioning should not be extensive or repetitive.
 - f. Staff will not put words in the child's mouth but will subsequently note the main points carefully.
 - g. A full written/electronic record will be kept by the staff duly signed and dated, including the time the conversation with the child took place, outline what was factually said, comment on the child's body language, etc as soon as possible after the disclosure
 - h. It is not appropriate for staff to make children write statements about abuse that may have happened to them or get them to sign the staff record.
 - i. Staff will reassure all children and let them know that they were right to inform them and inform the child that this information will now have to be passed on.
 - j. The designated safeguarding lead will be informed immediately unless the disclosure has been made to them.
 - k. If there is an online element to the abuse then staff should not view or forward any indecent images and refer to UKCIS guidance 2020
 - l. Information should be shared with Children's Social Care without delay, either to the child's

own social worker or to the MASH (Multi Agency Safeguarding Hub) or equivalent. Children's Social Care will liaise with the police where required which will ensure an appropriate police officer response rather than a uniformed response.

- m. The Police would only therefore be contacted directly in an emergency. [NSPCC- When to call the Police](#) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

Staff will never attempt to carry out an investigation of suspected abuse by interviewing the child or any others involved, especially if a criminal act is thought to have occurred. The only people who should investigate child abuse and harm are Social Care, Police or the NSPCC.

- 18.0 We recognise that all matters relating to child protection are confidential; however, a member of staff must never guarantee confidentiality to children; children will not be given promises that any information about an allegation will not be shared.
- 18.1 Where there is a child protection concern it will be passed immediately to the designated safeguarding lead. When a child is in immediate danger Children's Social Care/Police will be contacted.
- 18.2 The Head teacher or Designated Safeguarding Lead will disclose personal information about a pupil to other members of staff, including the level of involvement of other agencies, only on a 'need to know' basis.
- 18.3 All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children
- 18.4 Schools will ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018 and the GDPR. Relevant staff will also be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allows them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- 18.5 Schools should not under the GDPR as supplemented by the Data Protection Act 2018 provide pupils' education data where the serious harm test under that legislation is met. Therefore, in a situation where a child is in a refuge, this could mean that schools can withhold data under the GDPR; they should do so where the serious harm test is satisfied.
- 18.6 Further details on information sharing can be found:
- a. in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
 - b. at [Information sharing: advice for practitioners](#) providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful.
 - c. at The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department [Guide to the UK General Data Protection Regulations ICO](#)
 - d. in [Data Protection: a toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

19.0 Responsibilities

19.1 The Principal/Head Teacher and Chair of Governors are responsible for implementing this guidance and managing visitors to their school. All staff have a responsibility to ensure that visitors to their school are properly welcomed and managed safely within school.

19.2 All staff will be made aware of this guidance and that it applies to all visitors equally, including VIPs.

20.0 Types of visitor

20.1 There are a number of different types of legitimate visitors to a school.

- a. Visitors who attend the school in connection with children and who have a professional role i.e. social workers, educational psychologist, SEND officers, targeted support workers or health related professionals.
- b. Visitors attending to work with children in roles such as peripatetic tutors, sports coaches
- c. Visitors who attend the school in connection with the building, grounds or equipment i.e. builders, contractors, maintenance staff or IT workers
- d. VIPs – Very Important People
- e. Other legitimate visitors i.e. parents, school governors, Trustees

20.2 Visits should be planned to ensure they run smoothly, taking into account the need to safeguard both children, the reputation of the school and the visitor. Where appropriate, risk assessments should be undertaken.

21.0 Procedures for ALL visitors

- a. Wherever possible, visits to schools should be pre-arranged
- b. All visitors must report to reception first and not enter a school via any other entrance
- c. At reception, all visitors should explain the purpose of their visit and who has invited them.
- d. All Local Authority staff should show their photo ID card.
- e. All visitors will be asked to sign the visitors' record book. If the visitor is part of a large group of visitors a separate register may be utilised
- f. A visitor's badge should be worn and displayed prominently.
- g. Visitors should wait in the reception area until they are met by an appropriate member of staff to be escorted to their destination.
- h. All visitors should be accompanied by a member of staff. Visitors should not be alone with pupils/children unless this is a legitimate part of their role for example a social worker seeing a child and the relevant school has assured itself that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks).

- i. On departing the school, visitors should leave via reception, sign out of the building, return their visitor badge and be seen to leave the premises. School reception staff should check the 'in – out' records regularly to monitor compliance with these procedures.
- j. The Head Teacher or designated safeguarding lead (DSL) along with the nominated Safeguarding Governor should also monitor compliance with the agreed specified visitor's procedures. Should any shortfalls be found these should be addressed as a matter of urgency, to ensure children and visitors to the schools are kept safe.
- j. All EMET staff, including Trustees, who are wearing their EMET photo ID are not required to wear a visitor's badge nor sign in, unless this is required for a school's fire procedures.

22.0 **Special categories of visitor**

22.1 **VIPs**

A VIP is usually an external visitor of importance or influence who commands special treatment.

- a. Royalty and Royal Representatives
- b. Government (Members of Parliament, including government ministers and politicians)
- c. Diplomats and Senior Public Servants
- d. Chairpersons/ Chief Executives Officers of major companies and organisations
- e. Senior Officers from Charitable Trusts
- f. Religious leaders
- g. Civic and local community leaders
- h. Notable academics, Olympians, Authors, high profile prize winners and those with celebrity status in particular fields such as sport, music, the arts, media including celebrities and who are likely to inspire others.

22.2 **Important considerations for VIP visits**

An invitation to a VIP should be made in advance with sufficient time to enable appropriate planning for a safe and successful visit, recognising how the visit will be hosted and importantly who will be escorting and supervising the visitor at all times.

In general terms VIPs should be treated in a very similar way to any other visitor but a degree of common sense should prevail. Members of their entourage must follow normal procedures.

All VIPs and any entourage should be accompanied at all times by a member of staff.

22.3 **Local Authority, Trustees and EMET Staff**

Local Authority, Trustees and EMET staff who visit schools and who have unsupervised contact with children will have had an appropriate DBS check conducted by their employing service. Schools will of course, need to see identification from visitors to confirm that they do indeed work for the Local Authority or EMET. All Local Authority and EMET staff visiting schools carry photo identification.

22.4 **Staff from other MAT schools**

A member of staff from a MAT school wearing an EMET badge and lanyard has access to a school without signing in unless this is required for a school's fire procedures.

22.5 **Staff from other agencies**

The same requirement as above applies. If a school has 'written notification' from an agency that their staff have a DBS 'Enhanced with barred list information' check, then it is not necessary for the visitor to produce individual evidence of their DBS check before being granted unsupervised contact with children.

22.6 **Candidates for interview**

For those candidates currently working in a school, a small amount of time to see the school unescorted by a member of staff is appropriate. Candidates who do not fall into this category must be escorted by a member of staff.

22.6 **Contractors**

The statutory guidance says:

"Schools and colleges should ensure that any contractor, or any employee of the contractor, who is to work at the school or college has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across a number of sites.

Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity. Schools and colleges are responsible for determining the appropriate level of supervision depending on the circumstances.

If an individual working at a school or college is self-employed, the school or college should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

Schools and colleges should always check the identity of contractors and their staff on arrival at the school or college". (*Keeping Children Safe in Education DfE 2022*)

For building or maintenance contractors, schools should establish a formal agreement regarding access to specific areas of the building. For many building projects physical separation – fencing off the work areas will provide additional safeguards. Any DBS checks required should be completed before the contractor begins work in school.

22.7 **Trainee teachers**

The statutory guidance says:

"Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools and colleges should obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school or college would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children.

There is no requirement for the school to record details of fee-funded trainees on the single central record.”

(Keeping Children Safe in Education DfE 2022)

As with other visitors who have been checked by an external organisation, the school should have ‘written notification’ that appropriate checks have been made.

If tutors of trainee teachers do not have unsupervised contact with children, they will not require a DBS check. If they do have such contact, then it will be the responsibility of their institution to undertake the check and inform the school that appropriate checks have been made.

22.8 **Governors**

Governors should follow the same procedures as other visitors when coming into school.

Enhanced DBS checks will be carried out on all governors to ensure the safety of children in our schools. The school will hold this information on the single central record.

22.9 **Parents and relatives**

Keeping Children Safe in Education (2022) says that schools do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors such as children’s relatives or other visitors attending, for example, a sports day. In these circumstances, staff will use their professional judgment about the need to escort or supervise visitors.

22.10 **Ofsted**

Ofsted provide each local authority with written confirmation that all Ofsted staff who visit schools have been through a DBS ‘Enhanced with barred list information’ check. They also confirm that all approved additional inspectors have also been through a DBS ‘Enhanced with barred list information’ check. Ofsted provide a list of all approved additional inspectors at:

[Ofsted Inspectors: lists](https://www.gov.uk/government/publications/ofsted-inspector-lists) – GOV.UK (www.gov.uk)

Our schools will regard this note as constituting ‘written notification’ that Ofsted staff have been subject to relevant checks, as local authorities hold ‘written notification’ from Ofsted.

22.11 **Raising awareness of visitor safety with children**

Pupils should be reminded on a regular basis and especially prior to any VIP or celebrity visits that they should remain with a staff member and not wander off/ leave to an area which unsupervised by a member of staff. They should also be reminded of any other relevant actions identified by a risk assessment relating to the visit.

22.12 **Concerns related to a visitor**

Pupils, staff and parents should be made aware of who they should report concerns to or go to for help and advice if they have concerns about a visitor. This would be any teacher in the first instance, who should then report the concerns to the designated person for safeguarding.

Any issues regarding the suitability of visitors to a school will be noted by the designated person for safeguarding and promptly brought to the attention of the Principal/Head Teacher. If the behaviour of a visitor causes safeguarding concerns, the designated person for safeguarding will contact their Local Authority Safeguarding Partner for advice.

22.13 Unknown, uninvited or malicious visitors to the school

Any visitor to a school site who is not wearing an identity badge should be challenged politely by staff and escorted to reception to sign the visitor's book and be issued with an identity badge. Failure to comply should result in them being asked to leave the site and the Principal/Head Teacher or other senior person informed. In extreme circumstances or if the person refuses to leave, the police could be called and the school's appropriate emergency plan invoked.

22.14 Monitoring and Evaluation

Schools will regularly monitor and evaluate the implementation of this policy and its effectiveness. The responsibility for this will lie with the designated person for safeguarding

23.0 The Prevent Duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

23.1 Definitions (Keeping Children Safe in Education 2022)

23.1.1 **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

23.1.2 **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

- i) The Trust deplores terrorism of every kind and of any radical ideology. We will do anything we can to protect our pupils from the threat of terrorism and we will not tolerate extremism in our schools. As is our responsibility under law, we will do our utmost to safeguard our pupils from being drawn into extremism and terrorism.
- ii) We support and adhere to the latest guidance from the Department for Education which requires schools to actively promote fundamental British Values and to ensure that pupils are encouraged to regard people of all faiths, races and cultures with respect and tolerance.

24.0 Risk Assessment

24.1 The statutory guidance makes clear that schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

24.2 We appreciate that schools are in an important position to identify risks within a given local context and that it is important that schools understand these risks so that they can respond in an appropriate and proportionate way. In exercising our specific duty under Prevent we seek to protect children and young people from being drawn into, and against, the messages of all violent extremism. This includes and is not restricted to Daesh, AQ, Far Right, Neo Nazi, White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights risk.

24.3 There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. 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. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. The Prevent duty does not require teachers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

24.4 Furthermore, the Trust is aware that young people can be exposed to extremist influences or prejudiced views from an early age, which emanate from a variety of sources and media, including via the internet and at times pupils may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. As part of whole schools' online safety programmes, we highlight the potential risks pupils may face in relation to on-line radicalisation and encourage students to report any concerns they may have for themselves or other students.

25.0 **Working in Partnership**

25.1 When it is appropriate, a school will make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Contact will be made with parents/carers.

26.0 **Staff Training**

26.1 In addition to whole school training on safeguarding, which will include training on extremism and radicalisation and its safeguarding implications, each school works closely with the Prevent team and provides additional WRAP (Workshop to Raise Awareness of Prevent) training to staff.

27.0 **Building children's resilience to radicalisation**

27.1 Our schools can build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. Schools are already expected to promote the spiritual, moral, social and cultural development of pupils and, within this, fundamental British values.

27.2 Personal, Social and Health Education (PSHE), or our schools' alternative programme, is an effective way of providing pupils with time to explore sensitive or controversial issues, and equipping them with the knowledge and skills to understand and manage difficult situations. This subject is used in our schools to teach pupils to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. They can also develop effective ways of resisting pressures, including knowing when, where and how to get help. Each school encourages pupils to develop positive character traits through PSHE, such as resilience, determination, self-esteem, and confidence.

27.3 Citizenship helps to provide pupils with the knowledge, skills and understanding to prepare them to play a full and active part in society. It should equip pupils to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. In Citizenship, pupils learn about democracy, government and how laws are made and upheld. Pupils learn about the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect and understanding.

27.4 The Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, a school is able to offer a safe space in which children can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

28.0 Promoting Fundamental British Values

28.1 Each school should promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. This can help schools to demonstrate how they are meeting the requirements of section 78 of the Education Act 2002, in their provision of SMSC. Actively promoting the values means challenging opinions or behaviours in school that are contrary to fundamental British values.

28.2 Through the provision of SMSC our schools will:

- a. enable students to develop their self-knowledge, self-esteem and self-confidence;
- b. enable students to distinguish right from wrong and to respect the civil and criminal law of England;
- c. encourage students to accept responsibility for their behaviour, show initiative, and to understand how they can contribute positively to the lives of those living and working in the locality of a school and to society more widely;
- d. enable students to acquire a broad general knowledge of and respect for public institutions and services in England;
- e. further tolerance and harmony between different cultural traditions by enabling students to acquire an appreciation of and respect for their own and other cultures;
- f. encourage respect for other people; and
- g. encourage respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in England.

- 29.0 Our schools recognise that children are vulnerable to and capable of abusing their peers. We take such abuse as seriously as abuse perpetrated by an adult. Child on child abuse will not be tolerated or passed off as part of “banter” or “growing up”
- 29.1 In cases where child on child abuse is identified we will follow our child protection procedures, recognising that both the victim and perpetrator will require support.
- 29.2 We recognise that child on child abuse can manifest itself in many ways. This is most likely to include, but may not be limited to
- a. Child Sexual Exploitation Appendix H
 - b. Bullying (including cyberbullying)
 - c. Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - d. Sexual violence such as rape, assault by penetration and sexual assault
 - e. Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
 - f. Up-skirting, which is a criminal offence and typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - g. Consensual and non-consensual sharing of nude and semi-nude images and /or videos
 - h. Initiation/hazing type violence and rituals
 - i. Radicalisation
 - j. Abuse in intimate relationships
 - k. Children who display sexually harmful behaviour
 - l. Gang association and serious violence
 - m. Technology can be used for bullying and other abusive behaviour
- 29.3 There are a number of factors, which make children more vulnerable to child on child abuse: experience of abuse within their family; living with domestic violence young people in care; children who go missing; children with additional needs (SEN and/or disabilities).
- 29.4 Research tells us girls are more frequently identified as being abused by their peers, girls are more likely to experience unwanted sexual touching in schools. Boys are less likely to report intimate relationship abuse. Boys report high levels of victimisation in areas where they are affected by gangs. There is an increasing evidence base emerging on the sexual exploitation of boys (both by adults and peers) and LGBTQ young people. We recognise that both boys and girls experience child on child abuse but they do so in gendered ways.
- 29.5 Schools will use the following national guidance to assist them in dealing with child on child abuse incidents:
- a. Keeping Children Safe in Education 2022 [KCSIE 2022](#).
 - b. [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)
 - c. LGFL [undressed](#) provides advice for schools about how to teach young children about being tricked into getting undressed online in a fun way, without scaring them or explaining the motives of sex offenders.

- 29.6 Schools will ensure that both the alleged abuser/s and victim/s are supported and will use a range of strategies tools and templates available, for example:
- a. [Parents Protect - Traffic light tools for parents, carers and professionals](#)
 - b. Local intel and mapping tools and meetings e.g. LCP's – local children's partnerships.
 - c. Risk management plans for alleged abusers
 - d. Victim support plans for alleged victims
- 29.7 Schools will work with partners for example, the police, health, children's services, and youth offending to help keep the child safe and feel protected as well as signpost them to services.
- 29.8 Staff will listen to and consult with the child, working with the parents for example, looking at segregation and separation in the school and the classroom.
- 29.9 All staff will receive an awareness and understanding of child on child abuse, sexual violence and harassment in their training and we will work together to reduce this behaviour and any related incidents.
- 29.10 We aim to use approaches in the curriculum to address and tackle child on child abuse and eradicate any cultures pertaining to an unsafe and unhealthy school/setting where children do not feel safe.
- 29.11 We will reassure all victims that their concerns are being taken seriously, regardless of how long it has taken for them to come forward and that they will be supported and kept safe. Abuse which occurs online, or outside school will be treated equally seriously.
We will make it clear to all children and young people that the law is in place to protect them, rather than to criminalise them.
- 29.12 We acknowledge that even if no cases are being reported, child on child abuse may still be occurring. Staff will retain a high level of vigilance with this in mind

Appendix G Consensual and non-consensual sharing of nude and semi-nude images and/or videos

30.0 Introduction

30.1 Each school recognises that consensual and non-consensual sharing of nude and semi-nude images and videos is a growing concern amongst professionals and parents as it can expose children to risks, particularly if the imagery is shared further. It can lead to embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing images of under 18's is also illegal.

30.2 There is no clear definition of what is 'sexting' and indeed many professionals, young people and parents have different interpretations ranging from sending flirty messages to sending nude or semi-nude photographs via mobiles or over the internet. The term sexting is now referred to as consensual and non-consensual sharing of nude and semi-nude images and /or videos. KCSIE 2022

30.3 This guidance is based on UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people 2020. The full guidance is located at: [UKCIS Guidance 2020](#)

This guidance covers what happens when:

- a. A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- b. A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- c. A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

30.4 It does not cover:

- a. The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and schools should always inform the police and CSC.
- b. Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

30.5 The term youth produced sexual imagery has been adopted to provide some clarity and to distinguish it from imagery where there are adults involved in some manner. The purpose of this guidance is to make expectations clear to pupils and their parents and carers as well as to be clear to staff about each school's policy and procedure in responding to incidents.

30.6 This policy forms part of our schools' safeguarding arrangements and our response to concerns about consensual and non-consensual sharing of nude and semi-nude images and videos will be guided by the principle of proportionality and our primary concern at all times is the welfare and protection of the children and young people involved.

30.7 The Trust recognises that it is an offence under the Sexual Offences Act 2003 to possess, distribute, show and make indecent images of children (a child being under 18 years) but it does not define what is indecent.

- 30.8 However, the police accept that the law, which criminalised indecent images of children, was created before the technological advances of today and it originally sought to protect children from adults. It was not intended to criminalise children. Despite this, children who share sexual imagery of themselves or other children are breaking the law and therefore we will seek to manage this type of case appropriately.
- 30.9 All professionals including the National Police Chiefs Council agree that incidents involving youth produced imagery should primarily be treated as a safeguarding issue. It is agreed that we should not unnecessarily criminalise children, as the consequence of this can be significant in terms of their life chances in adulthood. Where children do share images, it is often as a result of natural curiosity and exploring relationships and in the context of the digital world we live in.
- 30.10 Our schools are therefore empowered to deal with these incidents without involving the police.

31.0 **Handling Incidents**

- 31.1 A school may become aware of the issue in a variety of ways i.e. from the child direct, a friend of parent or a member of staff.
- 31.2 We recognise that the child is likely to be very embarrassed and worried about what might happen. We also recognise the pressure that a child can be under to take part in sharing such imagery but we will reassure them that they are not on their own and will help and support them. We will also help them to understand what has happened and the context for the concerns. We will discuss issues of consent and trust within healthy relationships.
- 31.3 All incidents will be investigated in line with our safeguarding and child protection policy. Where an incident comes to our attention:
- a. The incident will be reported to the designated safeguarding lead as soon as possible.
 - b. An initial meeting with the appropriate school staff will be held to:
 - c. Establish if there is immediate risk & what further information is needed, whether or not the imagery has been shared
 - d. Consider facts about the children involved, which could influence a risk assessment. Further guidance and questions to consider is in Annex A, page 41 Sharing nudes and Semi-nudes guidance.
 - e. A meeting with the young person will be held (if appropriate)
 - f. Parents will generally be informed at an early stage
- 31.4 An immediate referral to Children's Social Care and/or the Police should be made if at the initial stage:
- a. The incident involves an adult
 - b. The child has been coerced, blackmailed or groomed or if there are concerns about capacity to consent
 - c. If the sexual acts are unusual for the developmental age or violent
 - d. Children under 13 years are involved
 - e. The child is at immediate risk e.g. suicidal or self-harming

- 31.5 Where the above do not apply then a school will generally deal with a matter without involving the police or children's social care although this will be subject to review.
- 31.6 This decision is made where we are confident that we have sufficient information to assess and manage any risks within our schools' pastoral support and disciplinary framework. The decision will be made by the designated safeguarding lead with the input of the Principal/Head Teacher and others as appropriate and will be recorded.
- 31.7 Examples of cases where there is no need to involve the Police are:
- a. If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for a school to manage the incident directly.
 - b. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to Police and/or Children's Social Care.
- 31.8 The following information will be considered when deciding on a course of action:
- a. Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
 - b. Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the young person in the imagery?
 - c. Are there any adults involved in the sharing of the imagery?
 - d. What is the impact on the young people involved?
 - e. Do the young people involved have additional vulnerabilities?
 - f. Does the young person understand consent?
 - g. Has the young person taken part in this kind of activity before?
- 31.9 Professional judgement will always be applied.
- 31.10 Images will not generally be viewed by staff, unless there is a clear reason for doing so, and reporting of the content is usually sufficient
- a. We will NOT copy, print or share the image as this is illegal
 - b. If viewing is done, it will be with another member of safeguarding staff or senior leadership
- 31.11 Once a decision has been made not to involve the Police or Children's Social Care then images may be deleted but we will be clear that this is appropriate action.
- 31.12 Where it is necessary to involve the Police and it is appropriate we are authorised to seize any device (Education Act 2011) and pass it the Police
- 31.13 Children's Social Care will be involved where there are concerns which meet the threshold or if we know they are already involved with a child.

32.0 Educating Young People

- 32.1 Our schools need to teach children in an age appropriate way about consensual and non-consensual sharing of nude and semi-nude images and videos to protect them from harm by providing them with the skills, attributes and knowledge to help them navigate risks.
- 32.2 This approach to tackling sensitive issues promotes a whole school approach to safeguarding giving children the space to explore key issues and the confidence to seek the support of adults should they encounter problems.
- 32.3 This issue will be taught as part of a wider PSHE and statutory RSE /(RE in our Primary schools) programme and through the IT curriculum work to underpin a specific message such as safe use of social media.
- 32.4 The work that we do therefore will include issues, at an age-appropriate level such as:
- a. communication
 - b. understanding healthy relationships including trust
 - c. understanding and respecting the concept of genuine consent
 - d. understanding our rights (especially our collective right to *be* safe and to *feel* safe)
 - e. recognising abusive and coercive language and behaviours
 - f. accepting our responsibilities (especially our responsibility to respect others trust and protect their right to be physically, emotionally and reputationally safe)

33.0 Helplines and reporting

- a. Children can talk to a ChildLine counsellor 24 hours a day about anything that is worrying them by ringing 0800 11 11 or in an online chat at 1-2-1 counsellor chat | Childline
- b. If parents or carers are concerned that their child is being contacted by adults as a result of having shared sexual imagery they should report to National Crime Agency -CEOP at [CEOP Safety Centre](#)
- c. ChildLine and the Internet Watch Foundation have partnered to help children get sexual or naked images removed from the internet. Young person can get their photo removed by talking to a ChildLine counsellor. More information is available at [Sexting and sending nudes | Childline](#)
- d. If parents and carers are concerned about their child, they can contact the NSPCC Helpline by ringing 0808 800 5000, by emailing help@nspcc.org.uk, or by texting 88858. They can also ring the Online Safety Helpline by ringing 0808 800 5002.

34.0 Advice and information for parents

- 34.1 Children can talk to a ChildLine counsellor 24 hours a day about anything that is worrying them by ringing 0800 11 11 or in an online chat at <https://www.childline.org.uk/get-support/1-2-1-counsellor-chat/>
- 34.2 If parents or carers are concerned that their child is being contacted by adults as a result of having shared sexual imagery they should report to NCA-CEOP at <https://www.ceop.police.uk/safety-centre/>

- 34.3 ChildLine and the Internet Watch Foundation have partnered to help children get sexual or naked images removed from the internet. A young person can get their photo removed by talking to a ChildLine counsellor. More information is available at <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/>
- 34.4 If parents and carers are concerned about their child, they can contact the NSPCC Helpline by ringing 0800 028 028 0295 or by emailing help@nspcc.org.uk
- 35.0 **National guidance**
- 35.1 Our schools will refer to national guidance when dealing with incidents of this nature.

[The DfE guidance 2018 on Searching Screening and Confiscation Advice for Schools](#)

[The DfE Guidance, June 2019 on Teaching Online Safety in Schools](#)

[Gov Guidance Sharing nudes and semi nudes, Dec 2020](#)

- 36.0 The Trust adheres to local authorities Safeguarding Children's Partnership procedures in relation to child criminal and child sexual exploitation. This is our policy to summarise our position.
- 36.1 We recognise that child criminal and sexual exploitation is a high profile issue both nationally and locally.
- 36.2 CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

A victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. **It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may be different, however, both boys and girls being criminally exploited, may be at higher risk of sexual exploitation.**

Some of the following can be indicators of CCE:

- a. children who appear with unexplained gifts or new possessions;
- b. children who associate with other young people involved in exploitation;
- c. children who suffer from changes in emotional well-being;
- d. children who misuse drugs and alcohol;
- e. children who go missing for periods of time or regularly come home late; and
- f. children who regularly miss school or education or do not take part in education.

Further information on the signs of a child's involvement in county lines is available in guidance: [Home Office and the Children's Society County Lines Toolkit](#)

- 36.3 Child Sexual Exploitation (CSE) occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It 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).
- 36.4 The above CCE indicators can also be indicators of CSE, as can:
- a. children who have older boyfriends or girlfriends; and
 - b. children who suffer from sexually transmitted infections or become pregnant.

- 36.5 Each school recognises that child sexual exploitation can cause a great deal of harm to a child, including physically, emotionally, educationally and socially. Where it exists, it can also cause harm to communities including schools.
- 36.6 As a Trust, we recognise that prevention is the best position with regard to CCE and CSE. We seek to support children to develop confidence and build resilience. We will endeavour to support their age appropriate knowledge and raise awareness and understanding of what CCE and CSE is, to understand the risks of CCE/CSE and to spot the warning signs for themselves and also their friends and peers and by doing so keep safe.
- 36.7 If prevention is not possible, we aim to identify children who are at risk of, or being, exploited very early. Early intervention is key to effectively working with the child to prevent or reduce the level of risk. Once they have been groomed, some children will find it difficult to withdraw from their abusers and we need to contribute to helping to protect them. Some children feel that they are in a relationship with these people. We commit to working with our inter-agency partners to safeguard and protect children.
- 36.8 Much of this work will be through our programmes of personal, social and health education (PSHE) (or school equivalent) or through our Relationships and Sex Education (RSE) work in secondary schools and Relationships Education (RE) work in primary schools.
- 36.9 An important part of educating our children is focussing on what is a healthy relationship and issues of consent. This will also target potential abusers at an early age with the intention of helping to shape their attitudes to others.
- 36.10 We want to have a culture where the welfare of children is actively promoted and staff and pupils are vigilant. As part of this, children will feel listened to and safe.

37.0 Domestic abuse can encompass a wide range of behaviours and may be rooted in a single incident, or pattern of incidents. The abuse can be psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home. A child may blame themselves for the abuse or have to leave the family home as a result.

37.1 Children may suffer the effects of abuse in their own intimate relationships too. (teenage relationship abuse) or be the perpetrator of this abuse on another child. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Being a victim of domestic abuse can have a lasting negative impact on a child's health, well-being and ability to learn.

37.2 **Operation Encompass:**

This operates in all police forces across England. It helps police and schools to work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household, the police will inform the designated safeguarding lead or deputy in a school. before the child/ren arrive at school the following day.

We will work with our local police contacts to ensure that we have up to date and relevant information and can quickly put appropriate support in place to safeguard children.

Operation Encompass Advice and helpline service for all staff from educational settings who may be concerned about children who have experienced domestic abuse:

The helpline is available Monday to Friday, 8AM to 1PM 0204 5139990 (charged at local rate)

- 38.0 We recognise that Female Genital Mutilation is a safeguarding issue; it is child abuse and a form of violence against girls. Our schools follow procedures laid down by their local authority Safeguarding Children Board.
- 38.1 A new duty for teachers to report 'known' cases of Female Genital Mutilation FGM was introduced on the 31st October 2015. If a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18 the teacher must personally report this to the police.
- 38.2 FGM is a procedure that includes the partial or total removal of the external female genital organs for 'cultural' or other non-therapeutic reasons.
- 38.3 It is illegal in the UK to subject a child to female genital mutilation (FGM) or to take a child abroad to undergo the procedure – Female Genital Mutilation Act 2003.
- 38.4 School staff should be alert to the following indicators:
- a. The family comes from a community known to practise FGM or is less integrated within the community.
 - b. A child may talk about a long holiday to a country where the practice is prevalent.
 - c. A child may confide that she is to have a 'special procedure' or to attend a special occasion.
 - d. A child may request help, directly or indirectly, from a teacher or another adult.
 - e. Any female child born to a woman or has a sister who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family.
 - f. A girl is withdrawn from PSHE/RSE.
- 38.5 In brief the signs that FGM may have occurred are:
- a. Difficulty walking, sitting or standing.
 - b. Spending longer in the bathroom.
 - c. Urinary or menstrual problems.
 - d. Prolonged absence and then noticeable behaviour changes.
 - e. Reluctance to undergo normal medical examinations.
 - f. May confide in a professional but may not be explicit or may be embarrassed.
- 38.6 Where it is known or suspected that FGM has occurred:
- a. Be sensitive to the child, and family, be gender sensitive, make no assumptions, be non-judgemental, use simple language, record clearly.
 - b. You have a duty to protect, safeguard and share information.
 - c. Refer to Children's Social Care for coordination of careful assessment (not necessarily with consent).
 - d. There will be potential enquiries under Section 47.
 - e. Potential police enquiries.
 - f. Possible use of police protection or legal orders such as EPO, prohibitive steps but not necessarily the removal of the child. (Government Equalities Office: Fact sheet)
 - g. [National FGM centre Schools guidance](#)

39.0

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA – Keeping Children Safe in Education 2022.

40.0 Forcing a person into a 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 of 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). The Trust recognises that it plays an important role in safeguarding children from forced marriage.

41.1 If there are concerns for the safety of a student under 18 years old, we will activate local child safeguarding procedures as set out by each Local Authority Safeguarding Children Board and use national and local protocols for multi-agency liaison with police and children's social care .
The Forced Marriage Unit has created guidelines for dealing with forced marriage, which can be found at: [The right to choose: government guidance on forced marriage](#)
School and College staff can contact the FMU if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk

42.0 What is a private fostering arrangement?

- 42.1 A private foster carer is someone *other than* a parent or a close relative who cares for a child for a period of 28 days or more, in agreement with the child's parent. It applies only to children under 16 years, or under 18 if they are disabled.
- 42.2 A private fostering arrangement is not a when a child is Looked After by the Local Authority or placed in any residential home, hospital or school.
- 42.3 Private foster carers can be part of the child's wider family, a friend of the family, the parents of the child's boyfriend or girlfriend or someone unknown but willing to foster the child. A cousin, great aunt or a co-habitee of a mother or father would therefore be a private foster carer.
- 42.4 Close relatives - a grandparent, a brother or sister, an aunt or an uncle, a step parent - are *not* private foster carers.

43.0 Who may be privately fostered?

- 43.1 This list is by no means exhaustive and indicates the scale and variety of situations and agencies these arrangements can cover.
- a. Children whose parents are unable to care for them, for example if they have chronic ill health or are in prison;
 - b. Children sent to this country, for education or health care, by parents who live overseas;
 - c. A child living with a friend's family because they don't get on with their own family;
 - d. Children living with a friend's family because of their parents' study or work;
 - e. Children staying with another family because their parents have separated or divorced;
 - f. Teenagers living with the family of a boyfriend or girlfriend;
 - g. Children from abroad who attend a language school or mainstream school in the county and are staying with host families;
 - h. Children at boarding schools who do not return to their parents in the holidays but stay with 'host families' recruited by 'education guardians';
 - i. Unaccompanied asylum seeking minors who are living with friends, relatives or strangers.
- 44.0 **Children who are trafficked** into the UK are especially vulnerable and are often living in de facto private fostering arrangements. Child trafficking is the movement of children for exploitation, including domestic servitude, commercial sexual exploitation and to support benefit claims. Where trafficking is suspected, a safeguarding referral should be made to the Local Authority Multi Agency Safeguarding Hub.
- 44.1 Each school will:
- a. Ensure that all staff are aware of the definition of private fostering and the Local Authority's responsibilities when such arrangements occur;
 - b. Ensure that when a student is involved in a private fostering arrangement staff are made aware of who has parental responsibility;
 - c. Look at admission files to check on the home situation, and make a note to follow up any circumstances which are not clear.

- d. Whenever staff become aware of private fostering arrangements they should notify the designated safeguarding lead
- e. The designated safeguarding lead or another appropriate member of staff should speak to the families of children who might be involved in private fostering and check that they are aware of their duty to notify the Local Authority of the arrangement. School staff should actively encourage the parents and/or carer to notify Children's Services of the arrangement

- 45.0 All children, regardless of their circumstances, are entitled to a full-time education suitable to their age, ability, aptitude and any special educational needs they may have. We are aware that local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.
- 45.1 We recognise that a child going missing from education is a potential indicator of abuse or neglect.
- 45.2 When a child is absent from school without authority, each school will follow its procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.
- 45.3 We will discuss and agree actions with regards to individual cases with the relevant colleagues in safeguarding/education within a school's local authority, for pupils who are to be removed from the admission register where the pupil:
- a. has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education – this will be communicated with the home elective team
 - b. does not arrive at the school as part of an admission process and we are not aware of their whereabouts
 - c. has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered and has been discussed with the children missing officer (CMO), or equivalent, as they have not been registered at a new school
 - d. has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
 - e. are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
 - f. have been permanently excluded
- 45.4 Where a pupil who fails to attend our schools regularly, or has been absent without the school's permission for a **continuous** period of 10 school days or more, in spite of attempts at regular contact from the school, the school will follow local authority guidance where children are at risk of missing education.
- 45.5 We will not remove a child from our roll unless we are legally permitted to do so.

- 46.0 Derby City Children Missing Education information can be found [here](#). A referral form can be accessed [here](#) (form 50)

- 47.0 Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into colleges. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. In dealing with such incidents the school will follow the advice set out in the Keeping Children Safe in Education 2022 – Part Five (Child-on-child sexual violence and sexual harassment).
- 47.1 **Sexual violence** refers to sexual offences under the Sexual Offences Act 2003: rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.
- 47.2 **Sexual harassment** refers to “unwanted conduct of a sexual nature” that can occur online and offline. Sexual harassment can include:
- a. Sexual comments
 - b. Sexual “jokes” or taunting
 - c. Physical behaviour
 - d. Online sexual harassment
 - e. Consensual and non-consensual sharing of nude and semi-nude images and videos
 - f. Sharing of unwanted explicit content
 - g. Up skirting
 - h. Sexualised online bullying
 - i. Unwanted sexual comments and messages, including on social media
 - j. Sexual exploitation; coercion and threats
- 47.3 The Trust’s approach will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. Some situations are statutorily clear:
- a. A child under the age of 13 can never consent to any sexual activity
 - b. The age of consent is 16
 - c. Sexual intercourse without consent is rape
 - d. Rape, assault by penetration and sexual assault are defined in law
 - e. Creating and sharing sexual photos and videos of under 18s is illegal (previously referred to as sexting). This includes children making and sharing sexual images and videos of themselves.
- 47.4 **Managing the report**
Every situation will be considered on a case by case basis. Parents and carers should normally be informed (unless this would put the victim at greater risk)
We will always consider the importance of understanding intra familial harms and any necessary Support for siblings following incidents.

- a. **Manage internally:** In some cases of sexual harassment, for example one-off incidents, the school may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, using the Behaviour and Anti-Bullying policies and by providing pastoral support.
- b. **Early help:** the school may decide that the children involved do not require statutory intervention but may benefit from early help. This can be particularly useful to address non-violent harmful sexual behaviour.
- c. **Referrals to Children's Social Care:** where a child has been harmed, is at risk of harm or is in immediate danger the school will make a referral to Children's Social Care.
- d. **Reporting to the police:** where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed to the police. Reporting to the police will generally be in parallel with referrals to Children's Social Care.

47.5 Risk assessment

When there has been a report of sexual violence, the designated safeguarding lead or deputy should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case by case basis.

47.6 Ongoing response

47.6.1 Safeguarding and supporting the victim

The needs and wishes of the victim should be paramount and whenever possible the victim, if they wish, should be able to continue in their normal routine. The priority should be to make the victim's daily experience as normal as possible so that school is a safe place for them. Support will be tailored on a case by case basis.

47.6.2 Safeguarding and supporting the alleged perpetrator

The school will take into account the need to balance the safeguarding of the victim (and the wider student body) and on the other hand providing the alleged perpetrator with an education, safeguarding support as appropriate and implementing any disciplinary sanctions. Advice will be taken as appropriate from Children's Social Care and the Police.

- 48.0 Each school acknowledges that we have a duty to safeguard and promote children's welfare and that this extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit the school arranges, and when organising for the care and accommodation of a child with a host family as part of the exchange.
- 48.1 In circumstances where the school arranges for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related the responsible adults will be engaging in regulated activity for the period of the stay.
- 48.2 When the school arranges a homestay, it will consider what intelligence/information it has that will best inform its assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay and of other adults the school knows will be staying at the time of the visit. The school will use their professional judgement to decide what it considers will be relevant. However, to help inform this assessment the schools **will** obtain a DBS enhanced certificate with barred list information of those adults with parental responsibility for the host child who live at the host address. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed it will also allow the school or college to consider, alongside all other intelligence that it has obtained, whether these adults would be a suitable host for a child. The school is not required to obtain a DBS enhanced certificate in respect of any other adults aged 16 or over in the household where the child will be staying.

- 49.0 The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.
- 49.1 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- a. content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
 - b. contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
 - c. conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying
 - d. commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group ([APWG](#)).

49.2 **Protecting children**

Governing bodies should be doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, governing bodies ensure their school has appropriate filters and monitoring systems in place. Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, governing bodies consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks.

Governing bodies should ensure that online safety is a running and interrelated theme, whilst devising and implementing the whole school approach to safeguarding, related policies and procedures. This will include consideration of how online safety is woven into curriculum plans, teacher training, the roles of designated safeguarding leads and a school's activities with parents and families.

Additional advice on preparing for online challenges and hoaxes, sharing information with parents and carers and where to get help and support, can be found here:

[Harmful Online Challenges and Hoaxes](#)

49.3 **Remote education**

The following guidance supports our protocols for ensuring that children, young people and staff are kept safe while learning remotely.

- [Safeguarding and Remote Education](#)
- [Undertaking remote teaching/NSPCC](#)

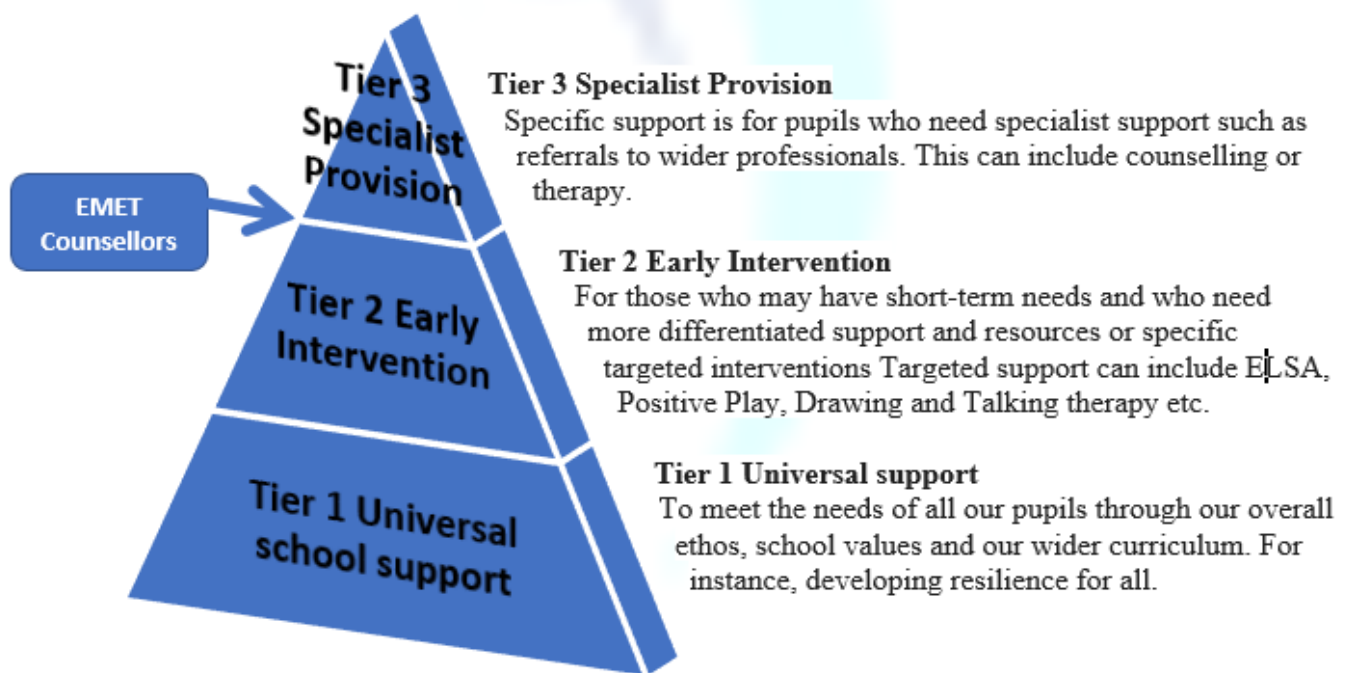
School staff will retain a high level of vigilance when communicating the importance of keeping children safe while learning online.

Schools will provide clear explanations of what is expected of children when online tasks are set and what systems schools use to filter and monitor children's safe use of the internet.

50.0 We have an important role to play in supporting the mental health and well-being of our learners. Mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. We have clear systems and processes in place for identifying potential mental health problems, seek advice from external agencies where appropriate and have clear referral and accountability systems. We have a Senior Mental Health lead identified in school and Adult and Children’s Mental Health First Aiders trained in school, who will be a first port of call for children, staff and parents wishing to discuss mental health and well-being. The school Mental Health lead can signpost to external agencies or the Trust Counsellor who can offer more specialised support where necessary.

50.1 Referral to the Trust Counsellor:

EMET adopt a 3-tiered approach to supporting children’s mental health and well-being.



Appendix T Managing Allegations made about staff, including supply teachers, volunteers and contractors

51.0 As part of our Trust and individual school approach to safeguarding, **all** concerns and/or allegations about adults working in or on behalf of the school (including supply teachers, volunteers and contractors) will be reported and dealt with promptly and appropriately.

By doing so, everyone in the school will:

- Create and embed a culture of openness, trust and transparency
- Help to identify concerning, problematic or inappropriate behaviour at an early stage
- Minimise risk of abuse
- Ensure that school staff are clear about professional boundaries and act within these in accordance with the ethos and value of the institution. The school recognises that there are two levels of allegation/concern.

- I. Allegations that may meet the harms threshold
- II. Allegations that do not meet the harms threshold, also known as ‘low levels of concern’

Our response is consistent with the Derby City and Derbyshire Safeguarding Children Partnership which can be found [here](#).

51.1 Allegations that may meet the harms threshold

This is where an allegation might indicate that a person would pose a risk of harm if they continue to work in their current position, or in any capacity with children in a school or college. Where it is alleged that anyone working in the establishment, including supply teachers, volunteers or contractors has:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates he/she may pose a risk of harm to children and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes any behaviour that may have happened outside school and is known as transferable risk.

51.2 If you have concerns about another staff member

Staff who are concerned about the conduct of a colleague (including supply staff, volunteers and contractors) towards a child are undoubtedly placed in a difficult position. However, all staff must remember that the welfare of the child is paramount.

All concerns of poor practice, or concerns about a child’s welfare brought about by the behaviour of colleagues, **must be reported to the Headteacher/Principal without delay.**

Where there are concerns about the Headteacher/Principal, this should be referred to the Chair of Governors in the first instance.

(The trust Safeguarding lead and Safeguarding trustees provide an additional layer of support, where staff may not be able to report to the Chair of Governors)

Where there is a conflict of interests in reporting to the Headteacher, Staff should report concerns directly to the Local Authority Designated Officer (LADO)

The member of staff should make a record which will include time, date, place of incident, persons present, what was witnessed, what was said etc; this should then be signed and dated.

51.3 **Looking after the welfare of the child**

Where a child has been harmed, or there is an immediate risk of harm to a child or if the situation is an emergency, children's social care should be contacted and where appropriate, the police. It is the designated safeguarding lead's responsibility to ensure that the child is not at risk and refer cases of suspected abuse to children's social care.

51.4 **Investigating and supporting the person subject to the allegation**

A case manager will be assigned to lead the investigation. This will be the Headteacher/Principal, or where the Headteacher/Principal is the subject of the allegation, the Chair of Governors, Trust Safeguarding lead or Safeguarding trustee.

Allegations will be dealt with:

- By applying common sense and judgement
- Quickly, fairly and consistently
- Providing effective protection for the child and support for the person subject to the allegation

Before contacting the LADO, the case manager will conduct basic enquiries in line with Cerby City and Derbyshire Safeguarding Children Partnership procedures to establish the facts to help them determine whether there is any foundation to the allegation; being careful not to jeopardise any future police investigation.

The headteacher/Principal, or Chair of Governors should complete the Derby City and Derbyshire Safeguarding Children Partnership LADO Referral Form and email to the responsible local authority (contact details found in Safeguarding Contacts, Section 1 of this policy). The LADO on duty will then contact them within one working day to discuss their referral. The discussion will consider the nature, content and context of the allegation and agree a course of action.

- When to inform the individual will be on a case by case basis, with guidance from the LADO, and where appropriate children's social care and the police.
- Where the subject of the allegation is a member of supply or contracted staff, the employment agency should be fully involved in any enquiries, however the school will usually take the lead
- Consideration will be given throughout to the support and information needs of pupils, parents and the subject of the allegation.
- Details of the allegation, any investigation, actions taken and the outcome category will be recorded as outlined in national and local guidance. Records will be kept confidential, held securely and comply with data protection legislation.
- If consideration needs to be given to the individual's employment, advice will be sought from HR or equivalent.

51.5 **Non-Recent allegations**

Non-recent allegations by a child will be reported to the LADO in line with Derby City and Derbyshire Safeguarding Children Partnership procedures. Where an adult makes an allegation to a school that they were abused as a child, the Derby City Safeguarding Adults procedure should be followed.

For further information about concerns which may meet the harms threshold, see our [Staff Code of Conduct Policy, Complaints Policy and Whistleblowing Policy](#).

51.6 **Allegations that do not meet the harms threshold (Low level concerns)**

Low level concern does not mean that it is insignificant, rather that the behaviour towards the child does not meet the harms threshold as outlined above. A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is:

- Inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or
- Is not considered serious enough for a referral to the LADO

The behaviour can exist on a wide spectrum. Further information about distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour can be found in the school/College staff code of conduct policy.

51.7 **Reporting Low level concerns**

Staff should share concerns with the designated safeguarding lead, this may include self-referral where staff have found themselves in a situation which could be misinterpreted, might appear compromising to others and/or on reflection, they believe they have behaved in a way which they consider falls below the expected, professional standards. This should be done either through CPOMS/MY Concern or by speaking directly with a member of the safeguarding team.

Reports about supply staff or contractors will be communicated to their employers.

All low-level concerns will be recorded in writing by the designated safeguarding lead. Records will be kept confidential, held securely and comply with data protection legislation.

For further information about the procedure for responding to low level concerns see our [Staff Code of Conduct Policy, Complaints Policy and Whistleblowing Policy](#).

East Midlands Education Trust
Keeping Children Safe in Education 2022
Low Level Concerns

This document should be used when 'low level' concerns as defined in Section 2 of Part 4 of Keeping Children Safe in Education 2022 are reported. In the event that concerns are either categorised as more serious than low level or when formal disciplinary procedures are required in relation to the low-level concern, please contact Central HR for further advice and guidance.

<p>1. Name of individual raising the concern</p> <p><i>If concern was raised anonymously, or the individual wishes to remain anonymous, please state "Anonymous".</i></p>	
<p>2. Date the concern was raised</p>	
<p>3. Name and role of individual about whom concern has been raised</p>	
<p>4. Details of the concern(s) reported (give description and context)</p> <p><i>A 'low level concern' is any concern– no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the staff code of conduct without meeting the allegations against staff threshold.</i></p>	
<p>5. Details of steps that have been taken to investigate this concern</p> <p><i>Steps should include speaking to the individual who raised the concern, the individual about whom the concern is raised and any witnesses. You will need to review your Code of Conduct and Safeguarding Policies to determine if there has been a breach.</i></p>	

<p>6. Set out the Individual's response to the concern</p>	
<p>7. Is this concern 'low level' or should it be treated as an allegation against staff and managed in accordance with Section 1 of Part 4?</p> <p><i>To reach this decision, consider the information set out in 5 and 6 above. If you are unsure, seek advice from your HR and/or safeguarding advisors and/or discuss the matter with your LADO. Set out your reasons for reaching your conclusion, including the advice provided by your advisors and any discussions with your LADO</i></p>	
<p>8. Have 'low level' or other concerns been raised about this individual previously?</p> <p><i>If so, please provides dates, brief details and relevant file/document reference for the concern(s). Also consider whether previous concern(s) raised, coupled with this new concern, meet the allegations against staff threshold.</i></p>	<p>Yes [] No []</p>
<p>Details of further action required</p> <p><i>Action could range from no action or a conversation to discuss the concern, to being clear why the behaviour is concerning and formal disciplinary action.</i></p>	

Completed by: Name:

Position:

Date:

Signature:

Please keep this form in the individual's personal file.

52.0 Police and Criminal Evidence Act (1984) – Code C

- 52.1 The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.
- 52.2 PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.
- 52.3 PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.
- 52.4 The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMs.
- 52.5 If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.
- 52.6 A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence², or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.
- 52.7 A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.
- 52.8 The 'appropriate adult' means, in the case of a child:**
- a) the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
 - b) a social worker of a local authority
 - c) failing these, some other responsible adult aged 18 or over who is not:
 - i. a police officer;
 - ii. employed by the police;
 - iii. under the direction or control of the chief officer of a police force; or
 - iv. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

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

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

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

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