

# Safeguarding and Child Protection Policy

<b>Category:</b>	Trust-wide Policy
<b>Authorised By:</b>	Board of Trustees
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## Version Control

<u>Ver.</u>	<u>Date</u>	<u>Comment</u>
9	September 2019	Ratified by the Safeguarding Trustee pending full ratification by the Board
9.1	October 2019	Updates relating to 2019 KCSIE guidance ratified by the Board
9.1.1		Updated DDSL information for Moorcroft and Sunshine House Schools
9.1.2	February 2020	Updated DSL & DDSL information for James Rennie School
10	September / October 2020	Agreed by the safeguarding Hub and Safeguarding Trustee and ratified by the Board.
10.1	November 2020	Updated section on personal devices and cameras
11	September 2021	Annual update to reflect KCSIE 2021
12	September 2022	Annual update to reflect KCSIE 2022
13	September 2023	Annual update to reflect KCSIE 2023
13.1	March 2024	Reflects new definition of safeguarding from Working Together to Safeguard Children. Ratified by the Safeguarding Trustee pending full ratification by the Board
14	September 2024	Annual Update to Reflect KCSIE
15	September 2025	Annual Update to Reflect KCSIE
15.1	November 2025	New section 36 added regarding remote learning.

This policy will be subject to ongoing review and may be amended prior to the scheduled date of the next review in order to reflect changes in legislation, statutory guidance, or best practice (where appropriate).

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## Revisions for September 2025

1. 1.1 Updated to reflect Keeping Children Safe in Education 2025
2. 2.51 Added links to DFE attendance guidance and noted that Working Together to Improve School Attendance is now Statutory
3. 27.2 Updated to include misinformation and disinformation as ways in which children can be harmed online
4. Page 52 links updated plus new links to support with Online Safety and AI
5. 5.13 Update details of schools responsibility for pupils in Alternative Provision
6. 10.5.18 Added children in kinship care to the list of those at most risk

Trustee responsible	Mariangela Ladu
Senior leader responsible for safeguarding	Andrew Sanders
Status and review cycle	Statutory Annual
Next review date	September 2026

## Safeguarding Statement

The Eden Academy Trust recognises our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation, and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the school's safeguarding responsibilities.

At The Eden Academy Trust we ensure that through our school vision, values, rules, diverse and differentiated curriculum and teaching, we promote tolerance and respect for all cultures, faiths and lifestyles, and we actively celebrate diversity and inclusion. The trustees also ensure that this ethos is reflected and implemented effectively in school policy and practice and that there are effective risk assessments in place to safeguard and promote students' welfare.

We have a duty to prepare our children for life in modern Britain and to keep them safe.

Pupils who attend our schools have the right to do so in safety. We do not tolerate bullying of any kind and we will challenge derogatory language and behaviour towards others.

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### Key Personnel for the Eden Academy Trust

**The Chair of the Board of Trustees is:** Barry Nolan

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**The Trustee responsible is:** Mari Ladu

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**The senior leader responsible is:** Andrew Sanders

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**The Trust Safeguarding officer is:** Lisa Hatcher

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Key Personnel for each school can be found on the individual school safeguarding appendix posted on the respective school websites.

## Terminology

**Safeguarding** and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

**Child Protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child** includes everyone under the age of 18. (It is worth noting that there are some young people educated in the trust who are 19 years of age, and that this policy still applies to our work to keep them safe.)

**Parents** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

## 1. Introduction

- 1.1. This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.
- 1.2. Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- 1.3. Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school
- 1.4. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- 1.5. Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- 1.6. The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- 1.7. Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- 1.8. Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk
- 1.9. The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- 1.10. The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- 1.11. The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- 1.12. The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- 1.13. This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

- 1.14. This policy also complies with our funding agreement and articles of association
- 1.15. The Board of Trustees takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.
- 1.16. This policy applies to all members of staff, volunteers and local advisory board members in the schools.

## **2. Policy principles**

- 2.1. The welfare of the child is paramount
- 2.2. All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- 2.3. We recognise that all adults, including temporary staff, volunteers and local advisory board members have a full and active part to play in protecting our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm; All staff believe that our schools should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- 2.4. Pupils and staff involved in child protection issues will receive appropriate support.

## **3. Policy aims**

- 3.1. To demonstrate the schools' commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- 3.2. To support the child's development in ways that will foster security, confidence and independence.
- 3.3. To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- 3.4. To raise the awareness of all teaching and support staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- 3.5. To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the schools, contribute to assessments of need and support packages for those children.
- 3.6. To emphasise the need for good levels of communication between all members of staff.
- 3.7. To develop a structured procedure within the schools which will be followed by all members of the schools' communities in cases of suspected abuse.
- 3.8. To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- 3.9. To ensure that all staff, including supply staff and trainee teachers, working within our schools who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, a satisfactory DBS check (according to guidance) <sup>1</sup>, that teachers are not prohibited from doing so, and

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<sup>1</sup> <https://www.gov.uk/government/collections/dbs-checking-service-guidance--2>

other mandatory checks such as an overseas criminal record check where appropriate, and a single central record is kept for internal and external audit.

## **4. Values**

### **4.1. Supporting children**

- 4.1.1. We recognise that a child who is abused or witnesses' violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- 4.1.2. We recognise that the schools may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- 4.1.3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn. Our schools will support all children by:
  - 4.1.3.1. Encouraging self-esteem, self-advocacy and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
  - 4.1.3.2. Promoting a caring, safe and positive environment.
  - 4.1.3.3. Responding sympathetically to any requests for time out to deal with distress and anxiety.
  - 4.1.3.4. Offering details of helplines, counselling or other avenues of external support.
  - 4.1.3.5. Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
  - 4.1.3.6. Notifying Social Care as soon as there is a significant concern.
  - 4.1.3.7. Providing continuing support to a child about whom there have been concerns who leaves one of our schools by ensuring that appropriate information is copied under confidential cover to the child's new setting as soon as possible, and receiving acknowledgement of safe receipt, and ensuring the school's medical records are forwarded as a matter of priority.
- 4.1.4. Children are taught to understand and manage risk through our personal, social, health and citizenship (PSHCE) education and relationships and sex education curricula and through all aspects of school life. This includes online safety.
- 4.1.5. Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

### **4.2. Prevention / protection**

- 4.3. We recognise that the schools play a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. They play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment
  - 4.3.1. The schools' communities will therefore:
    - 4.3.1.1. Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
    - 4.3.1.2. Include regular communication with children that gives due regard to their level of cognitive ability and communication difficulties e.g. through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes, etc.

- 4.3.1.3. Ensure that all children know there are adults in the school whom they can approach if they are worried or in difficulty.
- 4.3.1.4. Include safeguarding across the curriculum, including PSHCE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular, this will include anti-bullying work, online-safety and road safety. Also, focused work in Year 6 where relevant to prepare for transition to secondary school, and in Key Stages 4 and 5 for transition out of school, and more personal safety/independent travel.
- 4.3.1.5. Ensure all staff are aware of their school's guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## 5. Safe schools, safe staff

- 5.1. Schools will ensure that;
- 5.2. All staff receive information about their school's safeguarding arrangements, their school's safeguarding statement, staff code of conduct, behaviour policy, child protection policy, the safeguarding response to children who go missing from education, the role and names of the Designated Safeguarding Lead and their deputy(ies), and Keeping Children Safe in Education Part 1 (2024) in its entirety on induction;
- 5.3. All staff receive safeguarding and child protection training at induction in line with advice from the Trust leads for safeguarding (Andrew Sanders and Lisa Hatcher) and the local safeguarding partners in which the school is based. This must be regularly updated and they must receive safeguarding and child protection updates (for example, via e-mail, e-bulletins and staff meetings), as required, but at least annually;
- 5.4. Training with have regards to the teacher standards to support the expectation that all teachers will manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all pupils
- 5.5. All members of staff are trained in and receive regular updates in online safety and reporting concerns;

All staff, trustees and local advisory board members have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse; All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge, can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding. As the chair of Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the head, they receive training in managing allegations for this purpose.

- 5.6. The child protection policy is made available via the school's websites or other means and that parents/carers are made aware of this policy and their entitlement to have a copy via the school handbook/newsletter/website. All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Child Protection Policy and reference to it in each school's handbook.
- 5.7. The schools provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter- agency working and plans;

- 5.8. In cases where Trust premises are let to organisations who themselves will be working with children in the course of the let, the Trust lettings policy will seek assurances of the suitability of adults working with children on school sites;
- 5.9. Schools will seek to ensure the suitability of purpose of use of Trust premises, and that the organisations renting academy premises do not promote views or values which are at odds with the Trust's own values or are offensive in nature. In addition, any lettings which coincide with times pupils are on site will demonstrate the suitability of adults to be around children;
- 5.10. Community users organising activities for children are aware of the Trust's Child Protection Policy, guidelines and procedures;
- 5.11. The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy(ies), are clearly advertised in the schools with a statement explaining the school's role in referring and monitoring cases of suspected abuse;
- 5.12. All staff will be given a copy of Part 1 of Keeping Children Safe in Education 2024 and will sign to say they have read and understood it. This applies to the Trustees in relation to part 2 of the same guidance.
- 5.13. Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. Schools should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. The school should know where a child is based during school hours and should have records of where the child attends including any subcontracted provision or Satellite. Senior leaders from the school should also undertake monitoring visits at least half-termly to check on the provision and keep written records of such monitoring. They should also seek regular feedback from school colleagues who may be supporting the school's pupil(s) at the alternative provider.

## 6. Roles and responsibilities

### 6.1. All members of The Board of Trustees understand and fulfil their responsibilities namely, to ensure that;

- 6.1.1. There is a Trust-wide approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- 6.1.2. Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- 6.1.3. Be aware that the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure
- 6.1.4. There is a Child Protection and Safeguarding policy together with a staff behaviour policy (code of conduct) which they have approved and evaluated;
- 6.1.5. That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognized and are 3 times more likely to be abused than their peers

6.1.6. Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with local safeguarding partners and statutory requirements, are reviewed annually and that the Child Protection policy is publicly available on the schools' websites or by other means;

6.1.7. All Trustees should read KCSIE in its entirety

6.1.8. Ensures that all staff including temporary staff and volunteers are provided with the schools' child protection policy and staff code of conduct;

6.1.9. All staff will read Keeping Children Safe in Education (2024) part 1 in its entirety and will review this annually. Mechanisms will also be in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.

6.1.10. The schools operate a safer recruitment procedure that includes statutory checks on staff suitability to work with children regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training;

6.1.11. The schools have procedures for dealing with allegations of abuse against staff (including the Head teacher or Head of School) including supply staff, volunteers, and contractors and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned, or when an individual is suspended or moved out of regulated activity to another post, if they meet the 'harm' criteria as determined by the area LADO to whom any such procedures will have been reported.

6.1.12. The Executive Leader with responsibility for safeguarding is nominated to liaise with the local authority on child protection issues and in the event of an allegation of abuse made against a Head teacher or Head of School;

6.1.13. A member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) by the Board of Trustees who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description;

6.1.14. On appointment, the DSL and deputy(ies) undertake interagency training and also undertake DSL 'New to Role' and 'Update' training every two years;

6.1.15. All other staff have safeguarding training updated as appropriate to their role;

6.1.16. At least one member of the Board of Trustees has completed safer recruitment training to be repeated every five years.

6.1.17. Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and citizenship education (PSHCE) and through relationships and sex and health education.

6.1.18. Appropriate safeguarding responses are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation including sexual abuse or exploitation and to help prevent the risks of their going missing in future;

6.1.19. Appropriate online filtering and monitoring systems are in place and Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

- 6.1.20. The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors)
- 6.1.21. Enhanced DBS checks and section 128 checks (without barred list checks, unless the Trustee or LAB member is also a volunteer at one of the schools) are in place for all Trustees and local advisory board members;
- 6.1.22. An enhanced DBS check will be carried out on all volunteers.
- 6.1.23. Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll): Trustees should seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed, ensuring there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate. Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- 6.1.24. Any identified weaknesses in child protection systems within any of the Trust schools, or the Trust itself, are remedied immediately.

## **6.2. The Head teacher or Head of School will**

- 6.2.1. Ensure that the Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff;
- 6.2.2. Ensure that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction particularly those concerning referrals of cases of suspected abuse neglect and exploitation
- 6.2.3. Provide sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy(ies) DSL(s) to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- 6.2.4. Ensure that where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide;
- 6.2.5. Ensure that systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart;
- 6.2.6. Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures;
- 6.2.7. Ensure that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe both in real life and online;
- 6.2.8. they liaise with the Local Authority Designated Officer (LADO), before taking any action and on an ongoing basis, where an allegation is made against a member of staff or volunteer;
- 6.2.9. Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- 6.2.10. Make decisions regarding all low-level concerns, (though they may wish to collaborate with the DSL on this) and ensure that procedures with dealing with Low Level concerns are outlined clearly in local policies.

- 6.2.11. Ensure anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service;
- 6.2.12. In conjunction with the DSL (6.3.25 see below) they will ensure that, if they are away from the school site during school hours, that there is sufficient deputy DSL cover.
- 6.2.13. Communicate this policy to parents when their child joins the school and via the school website

### **6.3. The Designated Safeguarding Lead for each school:**

- 6.3.1. holds ultimate responsibility for safeguarding and child protection in the school;
- 6.3.2. acts as a source of support and expertise in carrying out safeguarding duties for the whole school community;
- 6.3.3. encourages a culture of listening to children and taking account of their wishes and feelings;
- 6.3.4. is appropriately trained with updates every two years and will refresh their knowledge and skills at regular intervals but at least annually;
- 6.3.5. Has a good understanding of harmful sexual behaviour.
- 6.3.6. will refer a child if there are concerns about possible abuse, to the local Multi-Agency Safeguarding Hub (MASH), and act as a focal point for staff to discuss concerns. Referrals should be made, following a telephone call, using the local Multi Agency Referral Form (MARF);
- 6.3.7. will keep detailed, accurate records, using appropriate online software, of all concerns about a child even if there is no need to make an immediate referral. This should include how concerns were followed up and resolved and the reason for decision making.
- 6.3.8. will ensure that all such records are kept confidential, stored securely and are separate from pupil records, until the child's 25th birthday;
- 6.3.9. will ensure that an indication of the existence of the additional file in 6.3.7 above is marked on the pupil records;
- 6.3.10. will ensure that when a pupil leaves the school, their child protection file is passed to the new school (5 days for an in-year transfer, or within the first 5 days of the start of a new term).
- 6.3.11. separately from the main pupil and (ensuring secure transit and that confirmation of receipt is obtained); will ensure that due consideration is given to information sharing in advance of transferring the child protection file.
- 6.3.12. Will ensure that a copy of the CP file is retained until such a time that the new school acknowledges receipt of the original file. The copy should then be shredded;
- 6.3.13. will liaise with the local authority and work with other agencies and professionals in line with Working Together to Safeguard Children (2023);
- 6.3.14. Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- 6.3.15. Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

- 6.3.16. Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- 6.3.17. Has a working knowledge of their local safeguarding partners' procedures;
- 6.3.18. Will ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required which has been shared with the those who have parental responsibility;
- 6.3.19. Will ensure that any pupil currently with a child protection plan who is absent without explanation for two days is referred to their key worker's Social Care Team;
- 6.3.20. Will ensure that all staff sign to say they have read, understood and agree to work within the school's child protection policy, staff behaviour policy (code of conduct) and Keeping Children Safe in Education (2024 Part 1 in its entirety and ensure that the policies are used appropriately.
- 6.3.21. Will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences; Will contribute to and provide, with the Head teacher, the audit of statutory duties and associated responsibilities to be submitted annually to the Senior Head teacher with responsibility for safeguarding.
- 6.3.22. Has an understanding of locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate.
- 6.3.23. Will ensure that the name of the Designated Safeguarding Lead and deputy(ies) are clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse;
- 6.3.24. In conjunction with the Head teacher or Head of School (see 6.2.12 above) they will ensure that, if they are away from the school site during school hours, that there is sufficient deputy DSL cover. In exceptional circumstances the DSL can be available remotely through video conferencing facilities.
- 6.3.25. The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. The document *NPCC- When to call the police2* should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do
- 6.3.26. The DSL will be given the time, funding, training, resources and support to: Provide advice and support to other staff on child welfare and child protection matters
- 6.3.27. Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- 6.3.28. Contribute to the assessment of children
- 6.3.29. Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

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2 <https://www.npcc.police.uk/documents/Children and Young people/When to%20ll the police guidance for schools and colleges.pdf>

6.3.30. The full responsibilities of the DSL and deputy/deputies are set out in their job description

#### **6.4. The Deputy Designated Safeguarding Lead(s)**

6.4.1. Is/are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

#### **6.5. All School Staff**

6.5.1. All staff working across the Trust will read at least Part 1 of Keeping Children Safe in Education (KSCIE). All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

6.5.2. All staff should be aware of Trust Wide systems which support safeguarding, including this child protection and safeguarding policy, the Eden code of Conduct, the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies], the behaviour policy, and the IT and online safety policy

6.5.3. Understand that it is everyone's responsibility to safeguard and promote the welfare of children and that they have a role to play in identifying concerns, sharing information and taking prompt action;

##### **6.5.4. Consider, at all times, what is in the best interests of the child;**

6.5.5. Know how to respond to a pupil who discloses abuse or neglect through delivery of 'Working together to Safeguard Children' (2023), and 'What to do if you are worried a child is being Abused' (2015). including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

6.5.6. Know the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

6.5.7. Understand the signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines), and non-consensual sharing of nude and semi-nude images and/or videos.

6.5.8. Understand the fact that children can be at risk of harm inside and outside of their home, at school and online

6.5.9. Understand The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children

6.5.10. Will refer any safeguarding or child protection concerns to the DSL or if necessary where the child is at immediate risk to the police or Children's Social care.

6.5.11. Understand the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.

6.5.12. Are aware of the Early Help process and understand their role within it including identifying emerging problems for children who may benefit from an offer of Early Help, liaising with the DSL in the first instance and supporting other agencies and professionals in an assessment through information sharing. In some cases, staff may act as the Lead Professional in Early Help Cases.

6.5.13. Staff should be particularly aware of the Early Help Indicators which include a child who

- Is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour,
- including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

6.5.14. Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

6.5.15. Will provide a safe environment in which children can learn.

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## 7. Confidentiality

- 7.1. The Eden Academy Trust recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm our schools must contribute to inter-agency working in line with Working Together to Safeguard Children (2023) and share information between professionals and agencies where there are concerns. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- 7.2. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the General Data Protection Regulation is not a barrier to sharing information where the failure to do so would place a child at risk of harm
- 7.3. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- 7.4. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- 7.5. The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- 7.6. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

- 7.7. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing
- 7.8. However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Head teacher, Head of School or DSLs will only disclose information about a child to other members of staff on a need-to-know basis.
- 7.9. We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with an Assistant Team Manager at the Children's Services Team on this point.

## **8. Personal devices and cameras**

- 8.1. Staff are allowed to bring their personal devices to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal devices will remain in their bags or cupboards during contact time with pupils.
- 8.2. Staff will not take pictures or recordings of pupils on their personal devices or cameras.
- 8.3. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school. See the trust ICT and E-safety policies (links included in Trust policies section)

## **9. Child protection procedures**

- 9.1. Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.
- 9.2. Further information about the four categories of abuse; physical, emotional, sexual and neglect, and indicators that a child may be being abused can be found in appendices 1 and 2.
- 9.3. Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".
- 9.4. There are also a number of specific safeguarding concerns that we recognise our pupils may experience;
- 9.5. child missing from education
- 9.6. child missing from home or care
- 9.7. child sexual exploitation (CSE Appendix 3)
- 9.8. bullying including cyberbullying
- 9.9. domestic abuse (Appendix 5)
- 9.10. drugs and alcohol misuse
- 9.11. fabricated or induced illness
- 9.12. faith abuse
- 9.13. female genital mutilation (FGM) (Appendix 4)
- 9.14. forced marriage

- 9.15. gangs and youth violence
- 9.16. gender-based violence/violence against women and girls (VAWG)
- 9.17. mental health
- 9.18. private fostering
- 9.19. radicalisation (Appendix 6)
- 9.20. sharing of Nudes or Semi-Nudes (sexting)
- 9.21. teenage relationship abuse
- 9.22. trafficking
- 9.23. child on child abuse
- 9.24. Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sharing of Nudes or Semi-Nudes (sexting) put children in danger and that safeguarding issues can manifest themselves via child on child abuse.
- 9.25. We also recognise that abuse, neglect and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.
- 9.26. If staff are concerned about a child's welfare they should follow the procedures outlined in their School's Local Appendix

## **10. Children who are particularly vulnerable**

- 10.1. Eden schools recognise that the children we educate are, due to their cognitive, social, emotional and/or physical and health needs, or because of a fixed mind-set more vulnerable to abuse, neglect and exploitation, and that additional barriers exist when recognising abuse.
- 10.2. We understand that this increase in risk is exacerbated by societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.
- 10.3. In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.
- 10.4. Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.
- 10.5. To ensure that all of our pupils receive equal protection we will give special consideration to children who are, in addition to having special educational needs;
  - 10.5.1. Disabled
  - 10.5.2. Young carers
  - 10.5.3. Affected by parental substance misuse, domestic abuse or parental mental health needs
  - 10.5.4. Asylum seekers
  - 10.5.5. Living away from home
  - 10.5.6. Vulnerable to being bullied or engaged in bullying

- 10.5.7. Already viewed as a 'problem'
- 10.5.8. Living in temporary accommodation
- 10.5.9. Live transient lifestyles
- 10.5.10. Living in chaotic and unsupportive home situations including where there are issues such as substance abuse or domestic violence vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- 10.5.11. At risk of sexual exploitation
- 10.5.12. Do not have English as a first language
- 10.5.13. At risk of female genital mutilation
- 10.5.14. At risk of forced marriage
- 10.5.15. At risk of radicalisation, or being drawn into extremist ideology
- 10.5.16. Are at risk due to either their own or a family member's mental health needs
- 10.5.17. Are looked after or previously looked after.
- 10.5.18. In Kinship Care

## **11. Pupils with a social worker**

- 11.1. Pupils may need a social worker due to safeguarding or welfare needs. We recognize that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- 11.2. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- 11.3. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:
- 11.4. Responding to unauthorised absence or missing education where there are known safeguarding risks the provision of pastoral and/or academic support
- 11.5. Due to the vulnerable nature of Eden pupils some schools will have a large number of pupils on a Children in Need plan. This can be due to children and young people needing a high level of care or respite provision. Schools will have their own arrangements for who attends CIN meetings. Schools needs to ensure that educational outcomes are discussed at these meetings.

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## **12. Anti-bullying/cyberbullying**

- 12.1. Our schools' individual policies on anti-bullying are set out in separate documents and acknowledge that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. School keep a record of known bullying incidents and this information is shared termly with the Senior Head teacher with responsibility for safeguarding. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.
- 12.2. When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Head

teacher/Head of School and the DSL will also consider implementing child protection procedures.

12.3. The subject of bullying is addressed at regular intervals in PSHE education.

## 13. Racist incidents

13.1. We acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents and they are reported termly to their Senior Head teacher with responsibility for safeguarding.

## 14. Radicalisation and extremism

14.1. The Prevent Duty for England and Wales (2015) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

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

14.3. Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

14.4. The Eden Academy Trust is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism 3.

14.5. The Eden Academy Trust seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

14.6. School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 6.

14.7. Opportunities are provided in the curriculum to enable pupils to learn about issues of religion, ethnicity and culture and the schools refer to the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014) 4. These should be outlined in individual school safeguarding appendices

14.8. If a member of staff is concerned a child is vulnerable to extremism, then the following actions should be taken;

14.9. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible a member of staff should speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. The person concerned should speak to a member of the senior leadership team and/or seek advice from local authority children's social

3 <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

4

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Schools.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf)

care. In the rare event a senior member of staff cannot be contacted then staff can refer to local authority children's social care directly. The DSL or deputy as soon as practically possible after the referral.

- 14.10. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
- 14.11. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.
- 14.12. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
  - 14.12.1. Think someone is in immediate danger
  - 14.12.2. Think someone may be planning to travel to join an extremist group
  - 14.12.3. See or hear something that may be terrorist-related

## **15. Domestic abuse**

- 15.1. Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.
- 15.2. We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.
- 15.3. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.
- 15.4. Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. (See Appendix 5).

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## **16. Homelessness**

- 16.1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- 16.2. The DSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
- 16.3. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## **17. Child sexual exploitation (CSE)**

- 17.1. Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.
- 17.2. Child Criminal Exploitation can be an indicator of CSE as can;
- 17.3. children who have older boyfriends or girlfriends; and
- 17.4. children who suffer from sexually transmitted infections or become pregnant.
- 17.5. Any concerns that a child is being, or is at risk of being, sexually exploited should be passed without delay to the DSL. The Eden Academy Trust is aware there is a clear link between regular school absence/truanting and CSE. Staff should consider a child to be at potential CSE risk in the case of regular school absence/truanting and make reasonable enquiries with the child and parents to assess this risk.
- 17.6. The DSL will use the local safeguarding partners' CSE screening tool where one exists on all occasions when there is a concern that a child is being, or is at risk of being, sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited. Where one is not available the DSL will report concerns to their local authority via the MASH team in the usual way.
- 17.7. In all cases if the tool identified any level of concern (green, amber or red) the DSL should contact the local MASH and email the completed CSE screening tool along with a Multi-Agency Referral Form (MARF). If a child is in immediate danger the police should be called on 999.
- 17.8. The Eden Academy Trust is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

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## **18. Child criminal exploitation**

- 18.1. Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
- 18.2. The abuse can be perpetrated by males or females, and children or adults. It can a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
- 18.3. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

- 18.4. Indicators of CCE can include a child:
- 18.5. Appearing with unexplained gifts or new possessions
- 18.6. Associating with other young people involved in exploitation
- 18.7. Suffering from changes in emotional wellbeing
- 18.8. Misusing drugs and alcohol
- 18.9. Going missing for periods of time or regularly coming home late
- 18.10. Regularly missing school or education
- 18.11. Go missing from school or home and are subsequently found in areas away from their own
- 18.12. Have been the perpetrator or alleged perpetrator of serious violence (e.g. knife crime), as well as the victim
- 18.13. Not taking part in education
- 18.14. If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **19. Female genital mutilation (FGM)**

- 19.1. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police 5. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- 19.2. The duty applies to all persons in The Eden Academy Trust who is employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed unless the member of staff has been specifically told to disclose. The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out.
- 19.3. If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher must personally make a report to the police force in which the girl resides by calling 101.
- 19.4. School staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4. Concerns about FGM outside of the mandatory reporting duty should be reported as per The Eden Academy Trust child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.
- 19.5. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

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5 <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

19.6. There are no circumstances in which a teacher or other member of staff should examine a pupil for signs of FGM.

## **20. Forced marriage**

20.1. A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

20.2. Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

20.3. A forced marriage is not the same as an arranged marriage which is common in some cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

20.4. School staff should never attempt to intervene directly as a school or through a third party in cases where it is suspected forced marriage has taken place or is being planned for. Contact should be made with the MASH team.

20.5. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, 153 Section 5B (6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case. 156 threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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## **21. So-called honour-based abuse (including female genital mutilation and forced marriage)**

21.1. So-called honour-based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

21.2. So-called honour-based abuse might be committed against people who;

21.3. become involved with a boyfriend or girlfriend from a different culture or religion;

21.4. want to get out of an arranged marriage;

21.5. want to get out of a forced marriage;

21.6. wear clothes or take part in activities that might not be considered traditional within a particular culture.

21.7. It is a violation of human rights and may be a form of domestic and/or sexual abuse. As a result, suspicions should be reported and dealt with in the same way all other concerns of domestic or sexual abuse are reported and dealt with, namely by reporting immediately to DSLs who will liaise with the MASH team. There is no, and cannot be, honour or justification for abusing the human rights of others.

## **22. One chance rule**

- 22.1. All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance to speak to a pupil who is a potential victim and have just one chance to save a life.
- 22.2. The Eden Academy Trust are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

## **23. Private fostering arrangements**

- 23.1. A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.
- 23.2. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.
- 23.3. The Eden Academy Trust recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.
- 23.4. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the local authority in which the child is resident of the circumstances.

## **24. Looked after and previously looked after children**

- 24.1. Although the most common reason for children becoming looked after is as a result of abuse, neglect and exploitation, in special school settings a number of pupils are Looked After due to the number of short breaks they are provided with throughout the year. Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- 24.2. Each school will appoint designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked- after children in line with statutory guidance. In a small school this may be the same person as the DSL. The school will publish the name of their designated teacher in their Safeguarding Appendices in line with statutory guidance.
- 24.3. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Virtual School Head teachers for children in care for the local authorities with which the school works.
- 24.4. The designated teacher for looked after children works with the Virtual School Head teacher to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the school and meet the needs in the child's personal education plan (PEP).
- 24.5. Children who were previously looked after remain vulnerable and designated teachers and Head teachers will ensure agencies work together to safeguard them.

## 25. Children Missing Education

25.1. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to 45 local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

### *Statutory*

*Guidance on school attendance '[Working together to improve school attendance](#)' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.*

*Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).*

*Further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#).*

*General information and advice for schools and colleges can be found in the Government's [Missing Children and Adults Strategy](#).*

25.2. Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse, neglect and exploitation, including sexual abuse and sexual exploitation or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

25.3. The DSL will monitor unauthorised absences and take appropriate action including notifying the relevant local authority, particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities 6 and any local authority policies on missing education.

25.4. Schools must inform the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

25.6. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

6 <https://www.gov.uk/government/publications/children-missing-education>

25.7. As a preventative measure our schools will seek to hold more than one emergency contact number for parents or carers giving additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

## **26. Elective home education**

26.1. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, schools should work with the LA and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has vulnerable, and/or has a social worker.

## **27. Online safety**

27.1. Children and young people increasingly use electronic equipment on a daily basis to access the internet, play games, share and view content and images via social media.

27.2. Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or e-mails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. They may also be affected by misinformation, disinformation and conspiracy theories

27.3. The Eden Academy Trust has an e-safety guidelines policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents (See flowchart, Appendix 7). schools and colleges use to filter and monitor online use.

27.4. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

27.5. The Eden Academy Trust will ensure all schools have appropriate filtering and monitoring systems in place and regularly review their effectiveness.

27.6. The Trust will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

27.7. The appropriateness of any filtering and monitoring systems are a matter for individual schools and will be informed in part, by the risk assessment required by the Prevent Duty.<sup>39</sup>

27.8. The Trust will ensure that all schools:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs

27.9. Pupils are taught about online safety throughout the curriculum at a level appropriate to their age and level of cognitive ability, and all staff receive online safety training

which is regularly updated. We also routinely filter out social media, such as Facebook. However, specific access arrangements can be made to ensure children can learn about safe and appropriate use of social media platforms, e-mail and other IT systems.

## **28. Child on child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2. In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. The Eden Academy Trust recognise that children are capable of abusing their peers. Abuse will never be tolerated and it will not be passed off as 'banter' or 'part of growing up'. The forms of child-on-child abuse, are most likely to include, but not limited to: bullying (including cyber bullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm; sexual violence such as rape, assault by penetration and sexual assault; sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse; upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks or obtaining sexual gratification, or cause the victim humiliation, distress or alarm; sexting (also known as Sharing of Nudes or Semi-Nudes); and hazing/initiation type violence and rituals. When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support. Child on Child abuse can be categorised as:

- 28.1. Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- 28.2. Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- 28.3. Child sexual exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- 28.4. Harmful sexual behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others (For more information, please see Appendix 2).
- 28.5. Serious youth violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19, i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.
- 28.6. Upskirting – staff should be made aware that upskirting (taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) or obtaining sexual gratification, or cause the victim humiliation, distress or alarm) is a criminal offence under the Voyeurism (Offences) Act 2019. Anyone of any gender, can be a victim.
- 28.7. The term child on child abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.
- 28.8. There are also different gender issues that can be prevalent when dealing with child on child abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

28.9. The Eden Academy Trust aims to reduce the likelihood of child on child abuse through;

28.10. the established ethos of respect, friendship, courtesy and kindness;

28.11. high expectations of behaviour;

28.12. clear consequences for unacceptable behaviour;

28.13. providing a developmentally appropriate PSHCE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;

28.14. systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed;

28.15. Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

28.16. robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk. Targeted risk assessments should consider school transport as a potentially vulnerable place.

28.17. Research indicates that young people rarely disclose child on child abuse and that if they do, it is likely to be to their friends. Therefore, The Eden Academy Trust will, where appropriate, also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

28.18. Any concerns, disclosures or allegations of child on child abuse in any form should be referred to the DSL using The Eden Academy's child protection procedures as set out in this policy. Where a concern regarding child on child abuse has been disclosed to the DSL(s), advice and guidance will be sought from children's social care and where it is clear a crime has been committed or there is a risk of crime being committed the police will be contacted. This behaviour may include putting other pupils at the school at risk, forcing others to use drugs or alcohol, sexually inappropriate videos, and sexual exploitation, harassment and abuse.

28.19. Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

28.20. Action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and implementing safety measures. We will consider these matters on a case-by-case basis, taking into account whether taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this. There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

28.21. Working with external agencies schools will respond to unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils, then safeguards will be put in place to promote the well-being of the pupils affected and the victim and perpetrator will be provided with support.

28.22. Schools should be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

28.23. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent. The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis): Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed. Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## **29. Sharing of nudes or semi-nudes (sexting)**

29.1. The practice of children sharing images and videos via text message, e-mail, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

29.2. Youth<sup>7</sup> produced sexual imagery refers to both images and videos where;

29.3. A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.

29.4. 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.

29.5. A person under the age if 18 is in possession of sexual imagery created by another person under the age of 18.

29.6. All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'.

29.7. Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

29.8. If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy, download, share or print the youth produced sexual imagery. Staff should not delete the image or ask the pupil to do so. They should not ask the pupil for information regarding the image. They should not do or say anything to blame or shame the young people involved. Information about the incident should be kept confidential. It is the DSLs responsibility to ask the pupil for information about the imagery.

29.9. The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the Police as appropriate.

29.10. Immediate referral at the initial review stage should be made to Children's Social Care/Police if;

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<sup>7</sup> Youth refers to anyone under the age of 18

29.11. The incident involves an adult;

29.12. There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, the obvious concern in our case that it may be owing to special education needs);

29.13. What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;

29.14. The imagery involves sexual acts;

29.15. The imagery involves anyone aged 12 or under;

29.16. There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

29.17. Given the needs of all of our children, there is a strong presumption that all cases will involve referral and there would have to be extremely compelling reasons not to that must be documented in the form of a risk assessment and agreed by the DSL and Head teacher/Head of School.

29.18. If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Head teacher/Head of School, to respond to the incident without escalation to Children's Social Care or the police.

29.19. In applying judgement, the DSL will consider if;

29.20. there is a significant age difference between the sender/receiver;

29.21. there is any coercion or encouragement beyond the sender/receiver;

29.22. the imagery was shared and received with the knowledge of the child in the imagery;

29.23. the child is more vulnerable than usual i.e. at risk;

29.24. there is a significant impact on the children involved;

29.25. the image is of a severe or extreme nature;

29.26. the child involved understands consent;

29.27. the situation is isolated or if the image been more widely distributed;

29.28. there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;

29.29. the children have been involved in incidents relating to youth produced imagery before.

29.30. If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the school.

29.31. The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

29.32. It is important that Pupils are taught about the issues surrounding sexting as part of our PSHEC education and computing programmes.

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## **30. Serious violence**

30.1. All staff should be alert to the signs that may indicate that children are vulnerable to, or involved in, serious 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.

30.2. If a member of staff becomes concerned that a child or children may be vulnerable to, or involved in, serious crime they should follow the child protection procedures and refer to the DSL as soon as possible.

## **31. Mental health and bereavement**

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

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

31.3. If a member of staff has a mental health concern about a child that is also a safeguarding concern, then immediate action should be taken by following the protocols for individual schools.

31.4. If a member of staff has a mental health concern about a child that is not also a safeguarding concern, they should speak to the DSL to agree a course of action.

31.5. Everyone experiences bereavement sometime in their life and we need to be alert to the impact of bereavement on the pupil's mental health and wellbeing. If a member of staff becomes aware that a pupil has a bereavement outside the school community then they should inform a member of the Senior Leadership Team and ensure the DSL is always alerted. Support needs to be individualised to the needs of the pupil and school within the trust will have a range of services available. This will include support from the arts therapy team, the SALT Team (for example, social stories) and family services. Support offered should always be discussed with the pupil's family. For pupils with a social worker, the school should work with the family to provide the most appropriate support. Individual schools should include bereavement as an essential topic in their PSHEC programmes. Schools will also have their own procedures to manage bereavement (e.g. critical incident plans) in a way that is most appropriate for their settings.

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## **32. Allegations against a staff member, an agency member of staff or a volunteer**

32.1. The Trust's Policy on Allegations against staff, supply staff, volunteers and contractors must be followed in cases where anyone working in a school (regardless of whether the behaviour took place on the school) has;

32.2. behaved in a way that has harmed a child, or may have harmed a child;

32.3. possibly committed a criminal offence against or related to a child;

32.4. behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or

32.5. behaved or may have behaved in a way that indicates they may not be suitable to work with children.

32.6. All school staff, volunteers and supply staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

32.7. All staff, volunteers and supply staff should be aware of their school's own behaviour policy.

32.8. Guidance about conduct and safe practice, including safe use of mobile phones by staff, supply staff and volunteers will be given at induction

32.9. We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member.

32.10. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Head teacher/Head of School.

32.11. The Head teacher/Head of School on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) of the local authority in which their school is based at the earliest opportunity and before taking any further action.

32.12. If the allegation made to a member of staff concerns the Head teacher/Head of School, the person receiving the allegation will immediately inform the Chief Executive Officer who will consult the LADO, without notifying the Head teacher/Head of School first.

32.13. Where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs).

32.14. The school will follow the local safeguarding partners' procedures for managing allegations against staff, procedures set out in Keeping Children Safe in Education (2024) and the Trust's managing allegations policy and procedures.

32.15. Suspension of the member of staff, supply teacher or volunteer, excluding the Head teacher/Head of School, against whom an allegation has been made, needs careful consideration, and the Head teacher/Head of School will seek the advice of the LADO in making this decision.

32.16. In the event of an allegation against the Head teacher/Head of School, the decision to suspend will be made by the Chief Executive Officer with advice as in 26.9 above.

32.17. We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

32.18. Staff, parents and local advisory board members are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

32.19. For schools that have an early years department, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale where appropriate.

32.20. When services or activities are provided separately by another body The Trust will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate.

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### **33. Low Level Concerns**

#### **33.1 Definition of low-level concerns**

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

### **33.2 Sharing low-level concerns**

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

### **33.4 Responding to low-level concerns**

If the concern is raised via a third party, the Headteacher/Head of School will collect evidence where necessary by speaking:

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

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

The Headteacher/Head of School will manage Low level concerns and all concerns should be reported to the Headteacher/Head of School who will determine if these concerns are at the threshold for a low level concern or need to be escalated. Having one recipient of all such concerns should allow any potential patterns of inappropriate, problematic or concerning behaviour to be identified, and ensure that no information is possibly lost.

### **33.5 Record keeping**

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

Records will be:

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

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

### **33.6 References**

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

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

## **34. Whistleblowing**

- 34.1. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 34.2. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in their school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Trust's Whistleblowing Policy.
- 34.3. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- 34.4. Whistleblowing regarding the Head teacher/Head of School should be made to the Chief Executive Officer whose contact details are available at the top of this policy.

## **35. Physical intervention**

- 35.1. We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Given the particular vulnerabilities of our pupil populations planning positive and proactive behaviour support must be used to reduce the occurrence of risky behaviour and the need to use restraint.
- 35.2. Such events should be recorded using the school's system as soon as is practicably possible and certainly within 24 hours.
- 35.3. The DSL or deputy DSL will review all reports of physical intervention within 24 hours of submission to ensure policy and procedure is followed, to keep track of patterns and trends and to follow up where appropriate to ensure the wellbeing of all involved.
- 35.4. Parents must be informed when their child has been subject to physical intervention.

- 35.5. Staff who are likely to need to use physical intervention will be appropriately trained using a recognised and accredited training provider who conform to the BILD Physical Intervention Accreditation Scheme and/or the Institute of Conflict Management.
- 35.6. We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

## **36. Remote Learning**

From time to time a pupil is unable to attend school but can join in lessons remotely. There may also be times when a member of staff might lead an activity from home, if they cannot attend due to bad weather or injury.

Staff should use Microsoft Teams for remote learning and ensure they are signed in with their Eden account.

Staff should not conduct online conferencing on a one-to-one basis. This can be avoided by asking parents to be present, involving another member of staff in the conference, or broadcasting to a group rather than an individual. Consent must be sought from parents / carers if you are broadcasting to a group of pupils. This can be gained by asking parents to send consent by email or written form or by sending them a link to a video conference with a statement to say that they give consent by joining the conference. All members of staff taking part in the conference call should introduce themselves.

There may be very rare events where staff conduct online learning from home. This may be if a school is closed during bad weather. While conducting online conferencing staff should be suitably dressed. They should also ensure that they are situated in a suitable and appropriate location within their residence (e.g. not in the bathroom). Members of their household should not join in with the conference call and should be advised of appropriate conduct while the broadcast is taking place. (e.g. wearing appropriate clothing and not using offensive language). All parties on a conference call should be reminded of confidentiality and family members should not be present in the room when conversations are confidential.

Staff should always keep a written log of the conference using the appropriate recording systems as directed by the school.

## **37. Trust policies that are related to this policy**

- Code of Conduct
- Whistleblowing
- E-Safety
- Safer Recruitment
- Attendance
- Complaints

## **38. School based policies**

- Curriculum
- PHSCE/RSHE/PHSE
- Teaching and Learning
- Administration of medication
- Intimate Care
- Behaviour/SEL



## Appendix 1: Recognising signs of child abuse

### Categories of Abuse

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

### Signs of Abuse in Children

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

### Risk indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s, carers or guardian
- Act in a way that is inappropriate to her/his age and stage of development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances

- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

## Recognising physical abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

## Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

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This resource from [NSPCC, 'Bruises on children: Core info leaflet'](#) is extremely useful on this subject

## Bite marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

## **Burns and scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

## **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

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## **Scars**

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## **Recognising emotional abuse**

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school children

- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

## Recognising signs of sexual abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age or stage of development
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a young person where the identity of the father is not disclosed, and where the young person is either below the legal age of consent, or there is good reason to believe the young person would not have been in a position to give informed consent to sexual intercourse (thresholds for Fraser competency unlikely to be met could be one such example)
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

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## Recognising neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

## Appendix 2: Sexual Violence and Sexual Harassment between children and young people

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Sexual Violence and Harassment includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the activity the following factors should be given consideration. The presence of exploitation in terms of:

- ❖ **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- ❖ **Consent** – agreement including all the following:
  - Understanding that is proposed based on age, maturity, development level, functioning and experience
  - Knowledge of society's standards for what is being proposed
  - Awareness of potential consequences and alternatives
  - Assumption that agreements or disagreements will be respected equally
  - Voluntary decision
  - Mental competence
- ❖ **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

In a special school setting the boundary between what is violent and what is part of a child's stage of development is in danger of being blurred. For example, we may not consider indecent exposure as abusive in all circumstances. Therefore, staff need to be trained how spot inappropriate behaviour that may result from a child's level of development. However, this behaviour should never be ignored and it is essential that staff are provided with the tools to deal with these situations sensitively and appropriately.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice to assist in identifying and responding appropriately to sexual behaviour is available from the Brook Sexual Behaviours Traffic Light Tool.<sup>8</sup>

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<sup>8</sup> <https://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool>

## Appendix 3: Child sexual exploitation

Staff should refer to Part A of 'Child Sexual Exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation' (2017)<sup>9</sup> for comprehensive guidance on Child Sexual Exploitation.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- going missing from home or school
- regular school absence/truanting
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- having unaffordable new things (clothes, mobile) or expensive or harmful habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether

<sup>9</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

## Appendix 4: Female genital mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

### What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris
- Type 2 Excision – partial/total removal of clitoris and labia minora
- Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

### Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

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### Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

### **The 'One Chance' rule**

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings/schools/colleges take action without delay and make a referral to children's services or to police if the circumstances come under the mandatory reporting duty for those employed or engaged to carry out 'teaching work' in the school.

## Appendix 5: Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. (This is the procedure where police forces are part of [Operation Encompass](#))

The DSL will provide support according to the child's needs and update records about their circumstances.

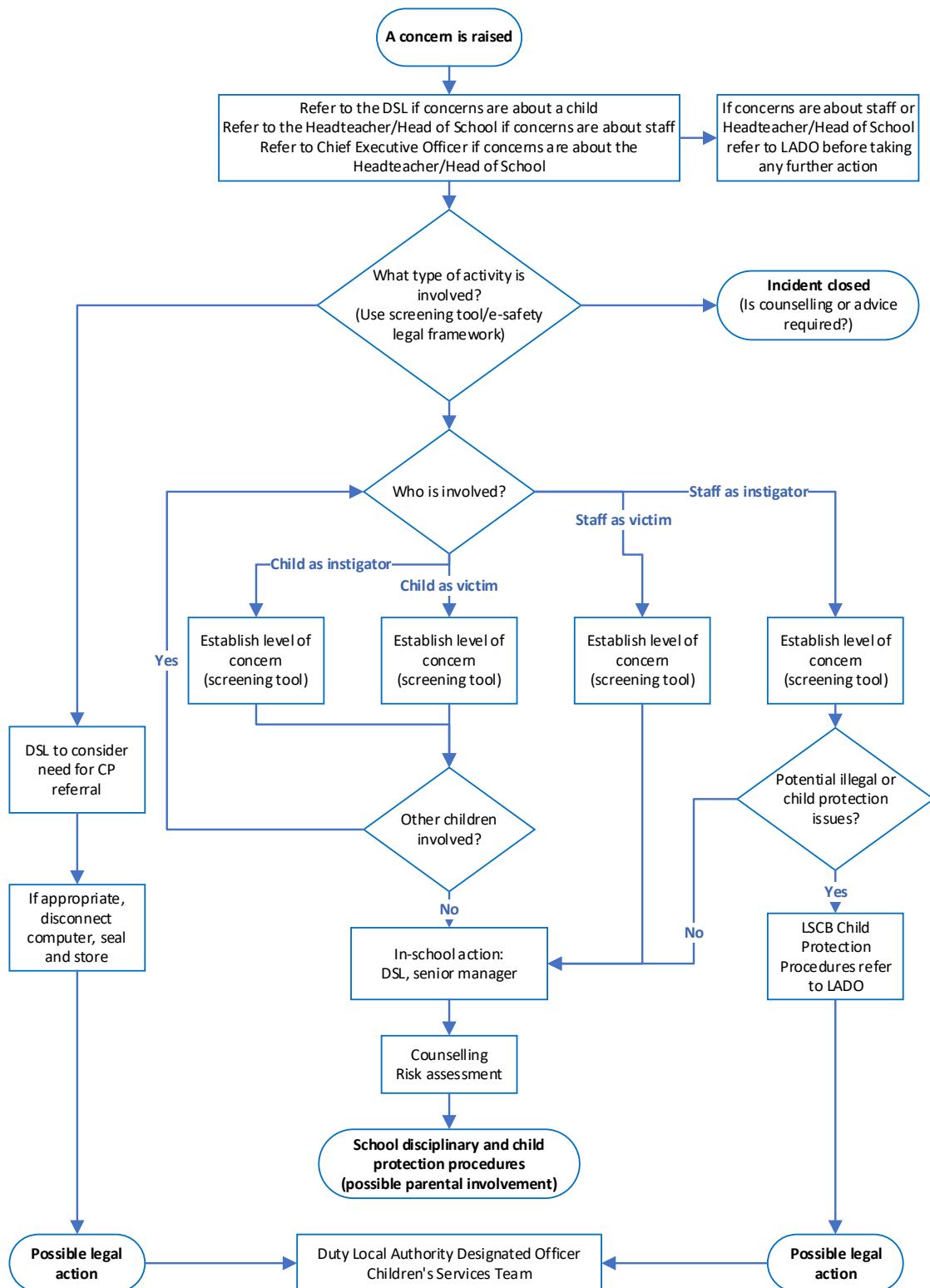
## Appendix 6: Indicator of vulnerability to radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:
  - Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:
  - The demonstration of unacceptable behaviour by using any means or medium to express views which:
    - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
    - Seek to provoke others to terrorist acts;
    - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
    - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
  - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
  - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
  - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
  - Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
  - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
  - Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include:
  - Being in contact with extremist recruiters;
  - Accessing violent extremist websites, especially those with a social networking element;
  - Possessing or accessing violent extremist literature;
  - Using extremist narratives and a global ideology to explain personal disadvantage;
  - Justifying the use of violence to solve societal issues;
  - Joining or seeking to join extremist organisations; and
  - Significant changes to appearance and / or behaviour;
  - Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

## Appendix 7: What to do if you have an online safety concern



## Appendix 8: Further advice on child protection

Further advice on child protection is available from:

**NSPCC:** <http://www.nspcc.org.uk/>

**NSPCC** [Safeguarding children with special educational needs and disabilities \(SEND\)](#) and [NSPCC - Safeguarding child protection/deaf and disabled children and young people](#)

**Childline:** <http://www.childline.org.uk/pages/home.aspx>

**CEOPS Thinkuknow:** (Includes resources for professionals and parents)  
<https://www.thinkuknow.co.uk/>

**Anti-Bullying Alliance:** <http://anti-bullyingalliance.org.uk/>

**National Bullying help line** <https://www.nationalbullyinghelpline.co.uk>

**Childnet International** –making the internet a great and safe place for children.  
Includes resources for professionals and parents: <http://www.childnet.com/>

**Filtering and Monitoring Standards for Schools and Colleges**

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**Cyber Security Standards for Schools and Colleges**

**DFE Guidance on Generative AI**

**The Information Commissioner's Employment Practices Code** Guidance on record keeping and retention

**Plan Techology for Your School** A tool for to support schools in using digital technology to keeping children safe online

**Safer Internet Centre:** <http://www.saferinternet.org.uk/>

**A safe space for teenagers worried about sexual behaviour**

**Helping Education Settings** Three resources to help education professionals to identify and respond when they have concerns of child sexual abuse or behaviour.

**Preventing Child Sexual Exploitation**

## **Appendix 9: Appendix to child protection policy for those pupils educated at an offsite provision such as a satellite or specialist site.**

Numbers of pupils are increasing across the Trust which means that currently (September 2023) there are 3 off site settings where pupils attend daily but are on the roll of one of the Trust Schools. Some of our off- site settings accommodate pupils from more than one school.

Offsite settings will need to publish their own safeguarding procedures in consultation with the Heads of home school represented in the settings. However, DSL's at the home school will need to be consulted on safeguarding incidents and important decisions.

### **DSLs**

Each setting should have their own DSL and Deputy DSL and should publish these names and contact details in their own safeguarding policy. They should also include the names and contact details of the DSLs and Heads of the mains schools.

### **Reporting Safeguarding Concerns**

All concerns should be reported to the Settings DSL and recorded on the online system. The Setting DSL should inform the DSL and Head Teacher of the home school immediately if a MASH referral is made that is of a Child Protection nature, if they receive a welfare check from MASH regarding any of their pupils, if a LADO referral is necessary or if a pupil is put on a child protection plan.

### **Recording**

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Larger settings may have their own online system and smaller settings may use the same system of their home school. DSLs at the home school will have access to settings own system so they are aware of concerns around pupils on their school roll. DSLs should also have alerts set up so that they are informed immediately of any concerns raised regarding their pupils.

### **Half-termly updates**

DSLs from the setting will meet half termly with DSLs from the home school to discuss any safeguarding issues. They will also meet as a team with the Trust Safeguarding Officer termly.

### **Safer recruitment**

The Eden Academy Trust operates an online Single Central Record. Staff working at each setting are recorded onto their home school's SCR. Central staff are recorded on the central SCR. All staff transferring to The Eden Academy Trust should have an Eden DBS and a personnel file including 2 professional references, evidence of qualifications, full employment history and evidence of Right to Work in the UK. The Single Central Record and personnel files should be available to the Heads of the home school on request and should be available immediately in the event of an Ofsted inspection.

Staff working at each setting are employees of their home school. The Head of the home school should be informed / consulted about any appointments and should be informed immediately about any safer recruitment concerns such as convictions on a DBS or an unsatisfactory reference.

## **Training**

It is the responsibility of the Head and DSL of the setting to ensure all staff receive safeguarding training. The Head and DSL at the home school should have access to training logs and should be informed of any issues around training.

## **Policies**

Each setting will continue to follow Trust policies and will also publish a site appendix using the template agreed by the safeguarding hub.

## Appendix 10: Model local school safeguarding arrangements

Each school will publish their own local arrangements based on this template including a safeguarding flowchart of reporting. This section is for illustration purposes only. Please see Local School Safeguarding Arrangements on each school website.

### Key Personnel

#### Key Personnel for School

**The Designated Safeguarding Lead (DSL) is:**

Contact details: email: Telephone:

**The deputy DSL(s) are:** and

Contact details: email and Telephone: 01895 437799

**The Head teacher / Head of School is:**

**The Executive Head teacher is**

### Safeguarding procedure

A flow chart is attached at the end of this document that outlines the procedures staff should follow when they have safeguarding concerns.

When a member of staff has a safeguarding concern then they should contact the DSL in the first instance. If the DSL is not available, they should contact the Deputy DSL (s). Wherever possible they should do this via face-to-face contact. If a DSL is not available, then staff should telephone one of the key contacts on the Safeguarding Flowchart. Initial concerns should not be raised first via email, recording on a digital system, or by leaving a message with the school office as this may cause delays in taking the appropriate action. If a member of staff has a concern about the conduct of another member of staff they should inform the Head Teacher / Head of School or one of the DSLs if the Head is unavailable. This includes any concerns regarding the behaviour of agency staff or volunteers.

Once a member of staff has reported a safeguarding issue then the DSL will ask them to record this as a concern on the schools digital recording system. If the member of staff has made any “paper notes” these should be handed to the DSL who will scan the notes and attach them to the digital concern form. Paper copies will then be shredded to maintain confidentiality.

All concerns forms and safeguarding information is kept on the schools digital system. The DSL is alerted immediately by email any time a concern is logged or updated. All safeguarding information is only accessible to DSLs. Once a member of staff has logged a concern they will no longer be able to access the information unless this is agreed by the DSL. From time to time the DSL may be asked to share concern forms with statutory bodies. All information shared must be in compliance with GDPR and the Data Protection Act (2018).

### When and what to report

If staff notice any indicators of abuse/neglect or signs that a child may be experiencing a safeguarding issue they should record these concerns on an electronic cause for concern form and submit it to the DSL. They should speak to a DSL in person without delay if they believe that a child is in danger of significant imminent harm. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

If staff have a concern, they should act on it. They should not assume a colleague or another professional will take action. Staff should also be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Staff should not assume that other professionals will share information that might be critical in keeping children safe.

There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.

Staff should recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. However, they may also indicate a child is being abused or is in need of additional safeguarding action.

In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

Staff should use the electronic cause for concern form to record these early concerns.

If the pupil begins to reveal that they are being harmed, staff should follow the advice below regarding a pupil making a disclosure.

If, for any reason, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

### **If a pupil discloses to a member of staff;**

We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.

A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

During their conversation with the pupil staff will;

- Listen to what the child has to say and allow them to speak freely
- Remain calm and not overact or act shocked or disgusted – the pupil may stop talking if they feel they are upsetting the listener
- Reassure the child that it is not their fault and that they have done the right thing in telling someone
- Not be afraid of silences – staff must remember how difficult it is for the pupil and allow them time to talk
- Take what the child is disclosing seriously
- Ask open questions and avoid asking leading questions
- Avoid jumping to conclusions, speculation or make accusations
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- Avoid admonishing the child for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong.

Tell the child what will happen next.

If a pupil talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on – staff are not allowed to keep secrets.

The member of staff should write up their conversation as soon as possible on an electronic cause for concern form in the child's own words. Staff should make this a matter of priority. It should also detail where the disclosure was made and who else was present.

### **Notifying parents**

Schools will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

Where there are concerns about forced marriage or so-called honour-based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

### **Reporting system for pupils**

Schools will ensure pupils feel safe and comfortable to come forward and report any concerns and/or allegations. The system that the school has in place to for pupils to report abuse is:

*add information here*

*Reporting systems should be well promoted, easily understood and easily accessible for pupils*

### **Making a referral**

Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's social care, early help or other support is appropriate in accordance with local safeguarding partners' thresholds.

If a referral is needed, then the DSL should make it. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made they can and should consider making a referral themselves.

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

The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

If, after a referral, the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves. If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

### **Supporting staff**

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

## Low level concerns

The Headteacher/Head of School will manage Low level concerns and all concerns should be reported to the Headteacher/Head of School who will determine if these concerns are at the threshold for a low level concern or need to be escalated. Having one recipient of all such concerns should allow any potential patterns of inappropriate, problematic or concerning behaviour to be identified, and ensure that no information is possibly lost.

## Information about the school (personalise for your setting)

*School is a secondary school for pupils with Severe, Learning Difficulties, Profound and Multiple Learning Difficulties, Autistic Spectrum Disorders and Challenging Behaviour. The majority of pupils come from the local area, although the school also accommodates pupils from neighbouring authorities. Over half of pupils come from a home where English is spoken as a second language.*

*All pupils at have communication difficulties to some degree and most are non-verbal. This means it is difficult for them to make a disclosure. Pupils with Profound and Multiple Learning Difficulties are unable to ask for help if they are being abused. A high percentage of students have little or no awareness of danger which makes them vulnerable to all types of exploitation.*

*School has an onsite school nurse who is employed by the National Health Service. Staff should always report initial concerns to the DSL employed by the school. However, from time to time the DSL may choose to consult medical staff for advice; for example, regarding the cause of a mark. Nevertheless, NHS staff have their own safeguarding protocols and if the school nurse has concerns about a child he or she may choose to report this through their own procedures. The school nurse will notify the DSL of any referrals made.*

## Curriculum (personalise for your setting)

*The curriculum includes regular outings and Sixth formers visit colleges once a week. If a member of staff has a safeguarding concern during an offsite activity they should contact the school immediately and speak to the DSL or one of the deputy DSLs.*

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*School has a comprehensive PSHEC curriculum where safeguarding is taught. Detailed information is available on the school website or can be obtained from the school on application to the deputy headteacher. The PSHEC curriculum is adapted to all level of needs and includes RSE topics such as appropriate relationships, personal development, puberty and how to stay safe. Pupils with limited communication are encouraged to share concerns through means of augmentative communication and through a system called "Talking Mats". This is supported by the speech and language therapy team. Those students with more advanced communication skills are encouraged to share any concerns with an appropriate adult.*

## E-safety

E-safety is included as part of the PSHEC curriculum. Pupils who are able to use the internet independently are taught about safe internet use and how to voice concerns. All pupils are supervised when using the internet. Staff receive safety training as part of their induction and this is renewed annually. Filtering is provided as part of the school's internet service level agreement. However, filters can be customised by the school.

Parents are informed about safety through school bulletins. Training is also provided by the Family Services Team. E-safety is also discussed at Annual Review meetings, parents evening and Child in Need meetings where appropriate.

## Mobile devices

Staff may bring mobile devices to work, however, staff are not permitted to use their mobile phones during the school day and these should be placed on silent. Staff must not use personal devices to take photographs of students.

**Date of next review:** September 2025

**Signed on behalf of the trustees:**

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