

# Safeguarding & Child Protection Policy

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**Responsible Colleagues**

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# We have one core purpose:

To have the biggest positive impact in the varied communities we serve through ensuring top drawer education for our learners.

## How do we ensure this across our trust?

In all we do we are:

**Ethical to the core**, ensuring that education is always front and centre

**Futures focused system leaders** - never simply followers

**Collaborative** in every endeavour

**Resolutely learner centred.**

## What does this look like across our trust?

We are always:



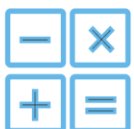
Education

- Ruthlessly ambitious for all who learn and work with us
- Unwaveringly inclusive – determined on eradicating barriers to educational success
- Committed to excellent teaching
- Determined upon academic excellence for all in our communities
- Compassionate, ethical and caring advocates for all in our communities
- Outwardly facing and globally conscious



Operations

- Committed to the very best people development and empowerment
- Determined to shout loudly and share proudly our successes
- The best professional and technical experts (supporting education) in the sector
- Committed to the very best understanding and management of risk



Financial

- Providing the best possible public service for the best possible value
- Determined to supplement our public income with shrewd income generation
- Building financially sustainable models of educational improvement in our communities
- Demonstrably efficient in all we do

## Our Values

- We will work inclusively within our communities, embracing the varied localities we serve while sharing our common vision and values.
- We will develop the very best leaders of the future, working to improve education and transform lives.
- We will adhere unwaveringly to the 'Nolan Principles' of Public Service, which is made clear in our commitment to Ethical Leadership.

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# Statement of Intent

At Academy Transformation Trust (ATT) we are committed to safeguarding children and young people and we expect everyone who works within our trust to share this commitment. This policy sets out how we will deliver these responsibilities.

This policy should be read in conjunction with *Keeping Children Safe in Education* (September 2021), which is statutory guidance to be read and followed by academies and colleges, and alongside *Working Together to Safeguard Children* (March 2018), a guide to inter-agency working to safeguard and promote the welfare of children. **These documents are available via the following links:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/99348/Keeping\\_children\\_safe\\_in\\_education\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/99348/Keeping_children_safe_in_education_2021.pdf)

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Furthermore, academy leaders will follow the procedures set out by the local safeguarding partnership in the areas in which are academies are situated.

## Online Safety

We understand that it is essential that children are safeguarded from harmful online content and wider online harms and take a whole school approach that protects, empowers and educates pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. **Please see the *E-safety Policy* for more information.**

We ensure that pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum including the DfE's *Teaching Online Safety in School* (June 2018) and UKCIS *Education for a Connected World* (Feb, 2018) and the four areas of risk in *Keeping Children Safe in Education*: content, contact, conduct and commerce.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/811796/Teaching\\_online\\_safety\\_in\\_school.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/759003/Education\\_for\\_a\\_connected\\_world\\_PDF.PDF](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759003/Education_for_a_connected_world_PDF.PDF)

Academy leaders will work with parents to build an understanding of the academy's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

**Safeguarding arrangements in our academy are underpinned by two key principles:**

- **Safeguarding is Everyone's Responsibility:** all staff, governors and volunteers must fulfil their full part in keeping children safe. We have a **whole school approach to safeguarding**. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development and operate in the **best interests of the child**.

- **A Child-Centered Approach:** a clear understanding of the needs and views of children. We recognise the importance of enabling children to talk openly about anything that worries them and to feel confident that they will be listened to or access well publicised systems for reporting or disclosing abuse or harm.

## 1 | Legal Framework and Guidance

- 1.1 This policy has due regard to statutory legislation and relevant guidance, including, but not limited to:
- *The Education Act (2002)*
  - *Keeping Children Safe in Education (2021)*
  - *Working Together to Safeguard Children (2018)*
  - *What to Do if You Are Worried About a Child (2015)*
  - *Information Sharing: Advice for Practitioners (2018)*
  - *Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2019)*
  - *The Data Protection Act (2018)*
  - *Serious Crime Act (2015)*
  - *Teaching Online Safety in School (2018)*
  - *UKCIS Education for a Connected World (2018)*
  - *Prevent Duty (2015)*
  - *Sexual Offences Act 2003*
  - *Preventing Youth Violence and Gang Involvement (2013)*
  - *Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance (2018)*

## 2 | Scope of this Policy

- 2.1 This policy defines a *child* as anyone under the age of 18 years or any learner of any age on the academy roll.
- 2.2 This policy applies to all employed ATT colleagues, including all permanent, temporary and support staff, members, trustees, governors, volunteers, contractors and external service or activity providers. There is an additional policy to support visitors to the academy to ensure awareness and appropriate reporting of any safeguarding concern as well as a leaflet that is proceed for visitors as they enter the academy.
- 2.3 There are six key elements to our policy, which are described in the following sections:
- The types of abuse that are covered by the policy

- The signs of abuse that adults should look out for
- Specific roles and responsibilities for safeguarding (in addition to everyone's duty of care to safeguard children and adults)
- Procedure and processes that should be followed, include the support provided to children
- How the academy leaders will ensure that all staff and volunteers are appropriately trained, and checked for their suitability to work within the academy
- How the policy will be managed and have its delivery overseen.

2.4 Through implementation of this policy academy leaders will ensure that our academy provides a safe environment for children to learn and develop.

## 3 | Safeguarding Roles and Responsibilities

Academies must prominently name staff in the following roles:

- Designated Safeguarding Lead (SLT member)
- Deputy Designated Safeguarding Lead
- Nominated Safeguarding governor
- Designated Teacher for Children in Care (and post CiC)
- Child Protection Officer

### 3.1 All staff, volunteers and local governors have responsibility for the following:

- To provide a safe environment in which all children can learn
- Identify children who may need extra help or who are suffering, or are likely to suffer, significant harm
- To take appropriate action, working with other services as needed
- To keep themselves updated with the systems within the academy which support safeguarding that were explained to them as part of their induction (including the staff Code of Conduct) which includes knowing the role, and working with, the academy's Designated Safeguarding Lead (DSL).
- To ensure they receive appropriate safeguarding and child protection training which is regularly updated.

In addition to working with the designated safeguarding lead staff members should be aware that they may be asked to support social workers to take decisions about individual children.

### 3.2 All staff are responsible for:

- Knowing who the academy's DSL is
- Raising any concerns with the DSL. If at any point there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anyone can make this referral if the DSL is unavailable

- Completing a formal written safeguarding concern form when making a referral. Staff should be clear that this should be done immediately, always on the same day
- Ensuring that their safeguarding and child protection training is up to date
- Being alert to the signs of abuse
- Maintaining an attitude of 'it could happen here'
- Maintaining an attitude that harmful sexual behaviour, sexual harassment/violence is never acceptable and will not be tolerated and being alert to inappropriate language and indicators of abuse and never rely on pupils to disclose abuse.
- When concerned about the welfare of a child, staff members will always act in the interests of the child
- Knowing the academy's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the DSL
- Sharing information and working together to provide children and young people with the help they need when they need it
- Referring to the DSL or the Principal any low-level concerns about another member of staff and any allegations of abuse directly to the Principal. If the concerns are about the Principal, these should be referred to the chair of the Local Governing Board (LGB). If the chair of the LGB is unavailable staff should refer directly to the Local Authority Designated Officer (LADO) and to ATT's Director of Safeguarding.
- Raising concerns about poor or unsafe practice and potential failures in the academy's safeguarding regime through the academy's *Whistleblowing Policy*
- Being aware of Local Authority & local safeguarding partners procedures, and ensuring these procedures are followed
- Seeking early help where a child and family would benefit from coordinated support from more than one agency via the local safeguarding partners Multi Agency Safeguarding Hub (MASH).

### **3.3 The LGB and academy leadership are responsible for:**

- Ensuring that we are compliant with all requirements in KCSIE
- Ensuring that there is an effective *Child Protection and Safeguarding Policy* in place together with a *Staff Code of Conduct*, which are provided to all staff, and ensuring all staff are given a mandatory induction, which includes familiarisation with child protection responsibilities and procedures to be followed if anyone has any concerns about a child's safety or welfare
- Ensuring that policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff
- Ensuring that we have a designated lead for child protection, and that they have access to appropriate training, which is updated every two years.

### **3.4 The DSL is responsible for:**

- Managing referrals from staff or any others from outside the academy
- Working with external agencies and professionals on matters of safety and safeguarding
- Undertaking relevant training and attending update sessions
- Raising awareness of safeguarding and child protection amongst the staff and parents; and ensuring that child protection information is transferred to the pupil's new school/academy
- Ensuring that the academy has a nominated local governor to liaise with the designated lead for *the local area* and any partner agencies in the event of allegations of abuse made against the principal

- Ensuring all staff receive the appropriate training, and keep it up to date, in line with advice from local safeguarding partners.
- Notifying the Children's Social Care department if there are concerns over unexplained absences of a pupil following the Child Missing Education (CME) policy and local procedure.
- Informing the Local Authority when a private fostering arrangement is in place
- Managing security within the academy and reviewing it regularly
- Ensuring that important safeguarding related policies, such as those for behaviour and bullying, are kept relevant and up to date
- Have an overview of the numbers of safeguarding and child protection referrals made from and share this with the Principal and LGB.
- Having in place effective ways to identify emerging problems and potential unmet needs for individual children and families
- Ensuring that the curriculum makes best use of Citizenship and PSHE, RSHE opportunities to cover safeguarding issues with children
- Ensuring at least one person on any appointment panel has undertaken safer recruitment training
- Ensuring the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required; and ensuring volunteers are appropriately supervised
- Ensuring procedures are in place to handle allegations against members of staff and volunteers (though the Principal will lead on this process)
- Ensuring there are procedures in place to handle allegations against other children (peer-on-peer abuse)
- Ensuring that there is support available for staff involved in difficult child protection cases/incidents both at the academy and externally through counselling and/or other services
- Creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the academy's development
- Ensuring through the safeguarding curriculum that pupils know the process of raising a concern (about themselves or a friend/other), that they know the academy's DSL (and deputy), and are aware of other support mechanisms such as ChildLine etc
- Ensuring that there is a designated safeguarding lead to promote the educational achievement of children who are in care or have a social worker to ensure that this person has appropriate training to work alongside the DTCiC
- Making this policy available to parents and carers as appropriate
- Ensuring that our staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role
- Ensuring all staff have regular reviews of their own practice to ensure they improve over time
- Ensuring all records are kept up to date and secure and kept separately from the main pupil file in a locked location.
- Keeping all child (safeguarding) records up to date and in line with the statutory requirements in KCSIE as a **minimum**.

**3.5 All** safeguarding concerns, discussions and decisions made, and the reasons for those decisions, must be recorded in writing. Information should be kept confidential and stored securely.

**3.6** Records **must** include:



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

## 4 | Safeguarding Process and Procedure

**4.1** The academy leaders will deliver their responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures identified in the Local Authority Safeguarding Partners policies and procedure guidance.

### **4.2 How to Report Any Concerns**

Clear procedures on reporting any concerns are given to all staff and volunteers and visitors. This is done as part of the staff induction training or on a safeguarding leaflet as they sign in.

All concerns should be reported in writing, using the academy's safeguarding concern form (whether online or paper based). Concern forms should always be completed as soon as possible, on the same day. Staff should never wait until the next day to complete a safeguarding concern form.

All child protection and or safeguarding concerns should be reported to the Designated Safeguarding Lead immediately. See [Appendix 1](#) for a flow diagram which explains how all disclosures are dealt with at the academy.

We take our responsibility to safeguard young people seriously. Failure to follow these reporting procedures may result in disciplinary action.

### **4.3 Taking Action**

If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to the Local Authority Emergency Duty Team or Police Child Abuse Investigation Team or call 999 if you are concerned a child needs immediate protection.

The DSL and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

*NSPCC- When to Call the Police-* for DSLs to understand when they should consider calling the police and what to expect when they do. It can be found here:

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

If the child has an injury that requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

#### 4.4 Pupil Disclosure of Abuse, Neglect or Radicalisation

We have a clear procedure for reporting concerns. If a pupil talks to a member of staff/volunteer about any risks to their safety or wellbeing, the staff member/volunteer will need to let the pupil know that they must pass the information on to the safeguarding team (DSL) in order to offer the proper support that the pupil requires.

Staff members/volunteers will allow them to speak freely and will not ask investigative questions. The staff member/volunteer will tell the pupil what will happen next.

It is the duty of the member of staff/volunteers to inform the DSL of what has been discussed. The staff member/volunteer will write up details of the conversation with the pupil as soon as possible on the **record of concern form (signed, timed and dated) found in reception or CPOMS** and deliver it to the DSL.

Staff should **not** wait until the following academy day to report a concern. Information will be shared on a need-to-know basis only.

Issues or concerns will **not** be discussed with colleagues, friends or family unless necessary for the welfare of the child.

#### 4.5 Suspecting that a Pupil is at a Risk of Harm

There will be occasions when staff/volunteers may suspect that a pupil may be at risk, but have no 'real' evidence. In these circumstances, staff will try to give the pupil the opportunity to talk. Staff should use the **concern form/CPOMS referral** to record these early concerns. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead.

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the academy's **Peer-on-Peer Abuse (Anti-Bullying) Policy** where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. We acknowledge that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our pupils receive equal protection, we will give special consideration to children that are considered to be vulnerable.

#### 4.6 Notifying Parents

The academy leaders will normally seek to discuss any concerns about a pupil with their parents. The DSL or deputy will contact the parent in the event of a concern, suspicion or disclosure. However, if the academy believes that notifying parents could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sought from Children's Social Care.

#### 4.7 Referral to Children's Social Care

The DSL will make a referral to Children's Social Care if it is believed that a pupil is suffering or is at risk of suffering significant harm.

The pupil (*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.

Social care assessment will consider where children are being harmed in contexts outside of the home (extra familial harm) so we will ensure that we provide as much information as possible as part of the referral process. This will allow any assessments to consider all the available evidence and enable a contextual approach to address harm.

#### **4.8 Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. If a member of staff becomes aware of an arrangement such as this, they should report via CPOMS to ensure that the DSL is fully aware of the situation for that child.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or are involved in trafficking, child sexual exploitation or modern-day slavery.

We have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although academies have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the academy. However, it should be clear to the academy who has parental responsibility.

Academy staff will notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The academy itself has a duty to inform the local authority of the private fostering arrangements.

In addition, on admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered.

#### **4.9 Reporting Directly to Child Protection Agencies**

Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police or the NSPCC if:

- The situation is an emergency and the DSL their deputy, the Vice Principal/Principal are all unavailable
- They are convinced that a direct report is the only way to ensure the pupil's safety.

#### 4.10 Early Help

We also liaise with a wide variety of outside agencies, many of which can see pupils weekly. Examples of the wider agencies we liaise with include multi-agency team/s, careers services, academy nurse, Child and Adolescent Mental Health Services (CAMHs), Educational Welfare Officer/s (EWOs), our local Police Community Support Officers (PCSOs), the Police and other services.

We encourage families, pupils and parents to work with these partner agencies also. The provision of early help services should form part of a continuum of help and support to respond to the different levels of need of individual children and families.

Staff and volunteers should be alert to the potential need for early help that might support a pupil early on with their particular safeguarding issue with a view to preventing it from becoming a bigger issue longer term.

DSLs will consider following the procedures (depending on individual need) identified for initiating early help for a child who:

- Is disabled and has specific additional needs
- Has special educational needs
- Is a young carer
- Is showing signs of engaging in anti-social or criminal behaviour
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence;
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect.

All initial contacts where staff, local governors or volunteers wish to make a request for general advice, information or a service for a child who may be a child with additional or complex needs should be made either by contacting the academy SENCO or by contacting the local MASH.

The DSL should be advised of any such contacts to ensure that all information is shared.

## 5 | Types of Abuse

- 5.1 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. The abuse might be from an adult or adults, or another child or children.

Academies keep a record of their top 5 local safeguarding concerns in the following table.

	Localised Safeguarding Concerns	Our strategic academy response – what we do to prevent or reduce harm and respond to harm if it occurs.
1		
2		
3		
4		
5		

There are four types of child abuse as defined in *Keeping Children Safe in Education* (September 2021) as follows:

## 5.2 Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**The physical signs of abuse may include:**

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh

- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks
- Multiple burns with a clearly demarcated edge

Most children will collect cuts, bruises and injuries and these should always be interpreted in the context of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks.

A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

**Changes in behaviour that can also indicate physical abuse:**

- Increasingly withdrawn behaviours
- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Running away from home
- Reluctance to get changed, for example in hot weather
- Depression

### 5.3 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow. However, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may also include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may also be imposing inappropriate expectations (for age or development stage) being imposed on a child. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another or causing children frequently to feel frightened or in danger.

It may involve serious bullying (including cyber-bullying) or the exploitation or corruption of children.

**Changes in behaviour which can indicate emotional abuse include:**

- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress
- Neurotic behaviour e.g. sulking, hair twisting, rocking

#### 5.4 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It can be difficult to recognise neglect. However, its effects can be long term and damaging for children.

**It may include a failure to:**

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

**The physical signs of neglect may include (but not limited to):**

- Being constantly dirty or 'smelly'
- Constant hunger, sometimes stealing food from other children
- Losing weight, or being constantly underweight
- Inappropriate or dirty clothing

**Neglect may be indicated by changes in behaviour which may include:**

- Mentioning being left alone or unsupervised
- Not having many friends
- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments

#### 5.5 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities (not necessarily involving a high level of violence) regardless of whether the child is aware of what is happening.

The activities may involve physical contact or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children

to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

**Physical signs of sexual abuse may include:**

- Pregnancy
- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down

**Changes in behaviour which can also indicate sexual abuse include:**

- Sexual knowledge which is beyond their age (or developmental level) or sexual drawings/language
- Saying that they have secrets that they cannot tell anyone about
- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults
- Sexual abuse is not solely perpetrated by adult males. Women also commit acts of sexual abuse, as can other children (peer-on-peer abuse).

## 5.6 Peer-on-Peer Abuse

Please refer to the *Anti-Peer-on-Peer Abuse and Bullying Policy* for details on how we prevent and reduce and report harms and how we respond to them when they occur. The *Anti-Peer-on-Peer Abuse and Bullying Policy* includes information about our whole school approach to peer-on-peer abuse, bullying, harmful sexual behaviour (including sexual harassment and sexual violence and bringing weapons into school).

Staff are aware that safeguarding issues can manifest themselves via peer-on-peer abuse. Staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can occur between children outside of these environments and that they must challenge inappropriate behaviour between peers that may be abuse in nature.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.



We believe that **abuse is abuse** and should never be tolerated or passed off as “banter”, “part of growing up”, “having a laugh” or “boys being boys”. Different gender issues can be prevalent when dealing with peer-on-peer abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

This is most likely to include but is not limited to;

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced/involved sexual imagery)
- *Upskirting*, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

We prevent peer-on-peer abuse by actively seeking to raise awareness of all forms of peer-on-peer abuse and by educating governors, our senior leadership team, staff, pupils, and parents about this issue.

This includes training governors, the senior leadership team, and staff on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify, and respond to it. Please refer to the *Anti-Peer-on-Peer Abuse Policy* for fuller details.

## 5.7 Bullying

Bullying is also abusive and will include at least one, if not two (or all) of the defined categories of abuse. **Refer to our *Anti-Bullying Policy*, available on our website**

For more information from the DfE (2017) on preventing and tackling bullying and cyber bullying please go to: <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

## 5.8 Sexual Violence and Sexual Harassment/Harmful Sexual Behaviour (HSB)

Peer-on-Peer Abuse, **sexual harassment** and **sexual violence** are **never acceptable and will not be tolerated**. All staff understand, that even if there are no disclosures in the academy, it does not mean it is not happening, it may be the case that it is just not being reported. As such all colleagues are trained to notice and identify signs and indicators of peer-on-peer abuse and where they have

any concerns regarding peer-on-peer abuse how to report these to the DSL or deputy through formal safeguarding systems.

Furthermore, any disclosures made by pupils will be believed and responded to in line with the *Anti-Peer-on-Peer Abuse and Bullying Policy* and pupils will be kept safe and never made to feel that they are creating a problem by reporting the abuse, sexual violence or sexual harassment. Incidents will be accessed and responded to on a case-by-case basis considering harm, immediate safety, pupil wishes and seeking advice and making referrals as required.

We will follow and adhere to Part 5 of *KCSIE* (statutory guidance) and Department for Education advice for schools, *Sexual Violence and Sexual Harassment Between Children in School and Colleges* (2021):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999239/SVSH\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf)

It covers:

- how we prevent peer-on-peer abuse
- what sexual violence and harassment is
- Schools' and colleges' legal responsibilities
- A whole school or college approach to safeguarding and child protection
- How to respond to reports of sexual violence and sexual harassment

The departmental advice, when referring to **sexual violence** refers to sexual offences as described under the *Sexual Offences Act* (2003).

This includes:

- Rape
- Assault by penetration
- Sexual assault

The advice sets out that **sexual harassment** is 'unwanted conduct of a sexual nature' that can occur online and offline. It is likely to violate a child's dignity, and/or makes them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment.

We believe that all children have a right to learn in a safe environment.

We recognise that some pupils may sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the *Behaviour for Learning Policy*.

Occasionally, allegations of a safeguarding nature may be made against pupils by others in the academy. Where this is the case an appropriate risk assessment and referrals will be undertaken to establish next steps to deal with the allegation.

The peer-on-peer risk assessment will include as a minimum:

- If a relationship has previously existed in any format; is there an imbalance of power within their relationships?
- Is the allegation of a serious nature?

- If the allegation includes a criminal offence, has the referral to the police and child service been made?
- Does this allegation raise risk factors for other pupils in the academy?
- Does the allegation indicate that other pupils may have been/could be affected by this pupil?
- Does the allegation indicate that young people outside the academy may be affected by this pupil?
- Does this allegation indicate that the contextual safeguarding within the academy environments should be reviewed?
- What support does this allegation indicate are needed for both the victim and alleged perpetrator of the peer-on-peer abuse?

All staff and volunteers must be aware that adults or children, who use children to meet their own sexual needs abuse both girls and boys of all ages. In all cases, children who tell someone about sexual abuse do so because they want it to stop. It is important, therefore, that children are always listened to and taken seriously and (as in all cases of abuse or neglect) that our reporting system is followed systematically without fail.

### 5.9 *Sexting, Nudes and Pics*

We will adhere to the guidance issued by the UK Council for Child Internet Safety (2020): <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

*Sexting* is when someone shares sexual, naked or semi-naked images or videos of themselves (or others) or sends sexually explicit messages. They can be sent, received or forwarded using any device that allows you to share media and messages.

Sexting may also be called:

- Trading or sending nudes
- Dirties
- Pic for pic
- Pics.

There are many reasons why a young person may want to send a naked or semi-naked picture, video or message to someone else:

- Joining in because they think that 'everyone is doing it'
- Boosting their self-esteem
- Flirting with others and testing their sexual identity
- Exploring their sexual feelings
- To get attention and connect with new people on social media
- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent
- Exploitation or blackmail

#### **Loss of control of images**

It is easy to send a photo or message, but the sender has no control about how it's passed on.

When images are stored or shared online they become public. Some people may think that images and videos only last a few seconds on social media and then they're deleted (such as snapchat) but they can still be saved or copied by others.

Images used on social media are also owned in many cases by the media that the child has used, for example anything in the Apple cloud is owned by Apple and anything posted on Facebook is owned by Facebook and will remain within their storage area. These storage areas are open to hacking and frequently are. This means that photos or videos which a young person may have shared privately could still end up being shared between adults they don't know.

However due to awareness campaigns many young people are aware of the permanence of online images and as a consequence to this rather than external risks need support and guidance in reducing the visibility of the image by contacting external agencies, support with parents and mental health and wellbeing provision.

#### **Associated risks of sexting, nudes, pics include:**

##### **Blackmail**

An offender may threaten to share the pictures with the child's family and friends unless the child sends money or more images.

##### **Unwanted Attention**

Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images and pose an even greater personal risk to the young person.

##### **Bullying**

If images are shared with their peers or in school, the child will be humiliated and may be [bullied](#).

##### **Emotional Distress**

Children can feel embarrassed and humiliated. If they're very distressed this could lead to suicide or [self-harm](#).

##### **Prevention:**

All staff will be trained in e-safety (Refer to our E-Safety policy for more information) and will have a role in preventing young people from sexting.

All staff will be available and approachable for pupils to make disclosures about sexting which will then be referred to the DSL for further investigation.

Every child is different, so our approach will be based on their exact situation.

We will seek to prevent young people sexting through educating them about the laws and potential consequences of sexting.

##### **We will:**

- Outline our expectations and explain the rules of having a mobile phone tablet or smartphone
- Ask pupils what they feel is acceptable to send to other people then discuss appropriate images and the dangers of inappropriate images (listed above)
- Make sure pupils are comfortable saying no, that they know their body is private and being asked to share explicit images is inappropriate and illegal. Talk about whether a person who asks for an image from you might also be asking other people for images.

- Explain to pupils about the importance of trust and consent in a healthy relationship (Refer to the *Sex and Relationships Education Policy*)
- Tell pupils that it's not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they're unhappy about.
- Tell pupils what can happen if things go wrong through real life examples such as television programs or news stories as far as possible, but also make clear that there is help and support to remove images and 'get through' any situation they or their peers find themselves in and encourage them to seek support from us.
- Ask pupils about the 'Granny rule'- would you want your Granny to see the image you're sharing?
- Discuss the impact of revenge sexting after relationships have broken down or a friend has done something as a joke and lost control of the image etc.
- Provide details of support and coping strategies if the young person finds themselves in an uncomfortable position such as the Zipit App to control the conversation with funny images to prevent further request for pictures or ChildLine if the situation has got out of control.
- Let pupils know that they can speak to us if this ever happens and that disclosures will be treated confidentially and without embarrassment and support will be given.
- Train staff to react calmly and listen to the concerns of the child and explain that they must share the information confidentially with the DSL.

**When a child has been affected by sexting we will:**

- Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious and there may be additional barriers due to perceived 'guilt'
- Recognise that they themselves may feel shocked, upset, angry, confused or disappointed while listening to the child, but that it is inappropriate to show this in any way
- Give themselves time to process the information, remembering that the child will be watching their reactions
- Reassure the child that they aren't alone
- Listen and offer support – they're probably upset and need help and advice, never criticism or comments such as 'I told you not to do that'
- Not ask questions like "why have you done it" as this may stop them from opening up
- Discuss the problem and the wider pressures that they may face, to help them to understand what's happened and understand any wider safeguarding concerns
- Assure the child that they'll do all they can to help and explain that they will seek the support of the DSL
- Remind them that they can always talk to Childline or another trusted adult if they aren't comfortable talking directly to the staff member.

**If a child has shared an explicit image, we will:**

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else
- Support the pupil to ask the social media site to remove the image and get in touch with [Childline](#). Together, Childline and the Internet Watch Foundation (IWF) will try to get the image removed.

- Alternatively, if it is in the best interests of the pupil, we will make a report direct to the [Internet Watch Foundation](#) (IWF). Childline is a confidential service, but to make a report on a child's behalf to the IWF we need to confirm who the child is and their date of birth
- Staff need to provide Childline or IWF with a link to the image which may require the police (because staff should not look at the image) to be involved (assess this against the 'aggravating factors'). After the link is sent staff will not keep a copy of the image for evidence as it's illegal to share or store child abuse images
- Discuss wider safeguarding concerns and agree who will be contacted and when they will contact parents/police/CEOP/ as appropriate to the case
- Contact the [Child Exploitation and Online Protection Centre](#) (CEOP) as well as the police if the image was requested by an adult, as this is [grooming](#) which is illegal
- If the image was requested by a school aged pupil not from this academy, we will contact the DSL at that school to raise awareness of potential wider safeguarding issues or circulation of the image in their school.

**We will encourage the child to:**

- Delete images from their social media accounts if they've have uploaded the image themselves
- If they're sharing an image which somebody else uploaded, consider asking that person to delete it
- If the image or video was shared over the web, don't comment on it or share it as this may mean the image is seen more widely.

**If a child has been sent a sexually explicit image:**

- Staff will ask them if they know the person who sent it and their age
- If the image was sent by another young person, staff may want to help the child to speak to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media;
- Staff should look at [Net Aware](#) for information and advice about this or contact the O2 and NSPCC online safety helpline on [0800 800 5002](#);
- If the image was sent by an adult, staff should contact [CEOP](#), the Child Exploitation and Online Protection Centre, as this may be part of the [grooming](#) process.

**A young person is breaking the law if they:**

- Take an explicit photo or video of themselves or a friend. (We will follow the guidance on aggravating factors and when to report to the police. In most cases of consensual sharing of images, the police will not need to be notified. Where there is an aggravating factor that includes a form of abuse – incidents will be reported to the police).
- Share an explicit image or video of a child, even if it's shared between children of the same age
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created
- However, as of January 2016, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest.
- Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they're a risk.

### 5.10 Upskirting

The *Voyeurism (Offences) Act*, which is commonly known as the *Upskirting Act*, came into force on 12 April 2019. *Upskirting* is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlines within this policy and where appropriate staff will also consult the *Anti- Peer-on-Peer Abuse Policy*.

#### Signposts for support or advice:

- CEOP's [Thinkuknow](#) give advice for parents, as well as children and young people of different ages, on staying safe online. Thinkuknow have created [short videos](#) to help parents understand why children 'sext', how to talk to them about it and what to do if their child is affected.
- [Internetmatters.org](#) work to help parents keep their children safe online. They provide free advice on online issues affecting children, including [sexting](#) and [grooming](#).
- [The UK Safer Internet Centre](#) gives advice and resources for parents and professionals on online safety. Their website has links to games and quizzes for [primary](#) and [secondary](#) aged children that encourages them to be safe online.
- **O2 and NSPCC Help Line:** [0808 8005002](#)
- **Zipit app:** This app provides children with alternative images to send in response to a request for explicit images.

### 5.11 Child Criminal Exploitation (CCE) and Exploitation of Vulnerable Adults (County Lines & Sexual Violence)

Both Child Sexual Exploitation (CSE- see [5.12](#)) and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however colleagues should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation (CSE- see [5.12](#)).



Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

County lines is the police term for urban gangs supplying drugs to suburban areas/market or coastal towns using dedicated mobile phone lines or “deal lines”.

It involves CCEAs gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations.

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

**Signs to look out for:**

- Going missing from school or home and/or being found out-of-area (though criminal gangs are becoming ‘wise’ to this method of identifying children that have been exploited and are moving to exploit children in the local area to avoid notice)
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being.

Where staff or volunteers have a concern around county lines they should inform their DSL immediately who will follow the local authority safeguarding procedures. Where there is a risk of imminent harm an immediate referral to the police should be made.

Regardless of gender or the role that they have been made to undertake any child or adult who has experienced criminal exploitation is likely to have experienced or been threatened with serious violence to themselves or their family or community.

**Serious violence indicators include:**

- Increased absence from school
- A significant decline in performance
- Changes in friendships or relationships with older individuals or groups
- Indicators of self-harm
- A significant change in well-being or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by or involved with individuals associated with criminal networks or gangs



Staff training will include these signs and indicators in line with the Home Office guidance *Preventing Youth Violence and Gang Involvement* and *Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance* (2018) and contextual safeguarding.

Colleagues are also trained on the additional risk factors associated with serious violence such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

**Preventing youth violence and gang involvement:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)

**County Lines:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741194/HOCountryLinesGuidanceSept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountryLinesGuidanceSept2018.pdf)

**Contextual Safeguarding Network:**

<https://www.contextualsafeguarding.org.uk/>

## 5.12 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. There is always an imbalance of power in the relationship. It is a form of sexual abuse. It is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes children aged 16-17 who can legally consent to have sex.

We are also aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such which can be an additional barrier to disclosure. Colleagues receive training and updates on CSE to ensure awareness of and mitigate these additional difficulties to ensure children receiving appropriate intervention and support at the earliest opportunity.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

The perpetrator holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or

enticement, including unwanted pressure from peers to have sex or sexual bullying including cyberbullying and grooming.

**There are three main types of child sexual exploitation:**

***‘Inappropriate relationships’***

Usually involves just one abuser who has inappropriate power which might be physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

***‘Boyfriend’***

Abuser grooms the victim by striking up a relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims might be required to attend ‘parties’ and sleep with multiple men and are threatened with violence (directly or against family members) if they try to seek help.

***‘Organised exploitation and trafficking’***

Victims are trafficked through criminal networks, often between towns and cities and are forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

For more information on CSE and a guide for practitioners please go to:

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

**Key indicators of children being sexually exploited may include:**

- Receiving unexplained gift or gifts from unknown sources
- Associating with other young people involved in exploitation
- Going missing for periods of time or regularly coming home late (please refer to the academy attendance policy)
- Regularly missing education or not taking part
- Displaying inappropriate sexualised behaviour
- Having multiple phones
- Mood swings or changes in emotional wellbeing
- Being seen at strange meeting places (hotels or known places of concern)
- Having older boyfriends / girlfriends (where the age difference might create an imbalance of power)
- Self-harming / drug or alcohol misuse
- Injuries (physical).

Academy safeguarding procedures for reporting any concerns apply and all concerns must be recorded and reported as soon as is reasonably possible and certainly that day.

### 5.13 Honour Based Abuse (HBA)

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action should take once the concern has been shared with the DSL or their deputy.

All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL (or deputy).

#### 5.13.1 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old however, it is believed that the majority of cases happen between the ages of 5 and 8.

##### **Risk factors for FGM include:**

- A low level of integration into UK society
- Having a mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin (where FGM is known to be prevalent)
- Being taken on a long holiday to the country of origin (where FGM is known to be prevalent)
- Talk about a ‘special’ procedure to become a woman

##### **Indications that FGM may have already taken place may include:**

- Difficulty walking, sitting or standing and may even look uncomfortable
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Frequent urinary, menstrual or stomach problems
- Prolonged or repeated absences from academy especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl’s return
- Reluctance to undergo medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear
- Talking about pain or discomfort between her legs.

The *Serious Crime Act* (2015) sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Under no circumstances should staff physically examine pupils.

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out and discuss any such cases with the DSL who will refer to children's social care. *The duty to report to the police does not apply in relation to at risk or suspected cases though staff will always refer to the DSL to take the next appropriate steps.*

For further advice from the Home Office on FGM please go to:

<https://www.gov.uk/government/collections/female-genital-mutilation>

For the multi-agency statutory guidance please go to:

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

The following is a useful summary of the FGM mandatory reporting duty from the Home Office:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)

### 5.13.2 Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. A marriage must be entered into with the free and full consent of both parties, there must be a choice.

Forced marriage is recognised as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). In some cases people may be taken abroad without knowing that they are to be married. When they arrive in that country, their passport(s)/travel documents may be taken to try to stop them from returning to the UK.

An *arranged* marriage is not the same as a forced marriage. In an arranged marriage, the families take a leading role in choosing the marriage partner, but both parties are free to choose whether to enter into the marriage or not.

Forced marriage is an abuse of human rights, a form of violence against men and women. It is child abuse when it affects children and abuse of vulnerable people when it affects those with disabilities.

Where staff or volunteers have any reason to suspect that someone is experiencing pressure or being forced in marriage, they must report this to the DSL through the academy process.

For more information on forced marriage go to:  
<https://www.gov.uk/government/publications/what-is-a-forced-marriage>

### 5.13.3 Breast Ironing/Flattening

Breast ironing or flattening is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of known cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware.

#### **Why does breast ironing happen?**

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. It is seen by the perpetrator as a protective measure for the child.

#### **Breast ironing is physical abuse**

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

#### **Breast Ironing in the UK**

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1,000 girls at risk. *Keeping Children Safe in Education* (2021) mentions breast ironing as part of the section on HBA.

Staff or volunteers worried about the risk of breast ironing in the academy should refer through the appropriate channels to the DSL as soon as possible who will make a referral to children's services. If staff or volunteers are concerned that the girl is in immediate danger, contact the police by calling 999.

The DSL will also contact the Foreign and Commonwealth Office if the girl has been taken abroad:

- Telephone: **020 7008 1500**
- From overseas: **+44 (0)20 7008 1500**

For more information on breast ironing or flattening go to:

<http://nationalfgmcentre.org.uk/breast-flattening/>

#### 5.14 Domestic Abuse and Young People

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are now categorised as victims of domestic abuse and children fleeing an area where domestic abuse has occurred should be given priority placements in schools through fair access arrangements.

We encourage pupils to come forward by raising awareness of the issue and teaching pupils about health relationships through SRE, the wider curriculum and modelling behaviour in the academy.

##### **Adolescent to Parent Violent Abuse**

APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach. For more information on APVA go to:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/420963/APVA.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/420963/APVA.pdf)

##### **What to look out for when a child is witnessing domestic abuse:**

The emotional responses of children who witness domestic violence may include fear, guilt, shame, sleep disturbances, sadness, depression, and anger (at both the abuser for the abuse and at the victim for being unable to prevent the abuse).

Physical responses may include stomach aches and/or headaches, bedwetting, and loss of ability to concentrate. Some children may also experience physical or sexual abuse or neglect. Others may be injured while trying to intervene on behalf of the victim or a sibling.

The behavioural responses of children who witness domestic violence may include acting out, withdrawal, or anxiousness to please. The children may exhibit signs of anxiety and have a short attention span which may result in poor academic performance and attendance. They may experience developmental delays in speech, motor or cognitive skills. They may also use violence

to express themselves displaying increased aggression with peers or family. They can become self-injuring.

If a child discloses that they have witnessed domestic abuse, or an adult linked to a child in your academy discloses that they are being abused staff and volunteers are directed to follow safeguarding procedures and report your concern to the DSL.

For more information on Domestic Abuse go to:

<https://www.gov.uk/guidance/domestic-violence-and-abuse#history>

### 5.15 Preventing Radicalisation

The *Counter-Terrorism and Security Act* (2015), places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism the *Prevent Duty*.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised they should discuss this with the DSL.

The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

#### **Channel**

We understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Channel guidance is available at: <https://www.gov.uk/government/publications/channel-guidance>

We use the safeguarding through the curriculum to ensure that children and young people understand how people with extreme views share these (including online) to radicalise others.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching our core values alongside the Fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

#### **Early indicators of radicalisation or extremism may include:**

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside academy
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti or artwork or writing that displays extremist themes

- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others.

For the revised Prevent Duty Guidance please go to:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799\\_Revised\\_Prevent\\_Duty\\_Guidance\\_England\\_Wales\\_V2-Interactive.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)

For further Guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism from the Home Office please go to:

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

The Government's 'Educate Against Hate' provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

<https://educateagainsthate.com/>

#### 5.16 Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. In addition, ATT professionals are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. We will ensure that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

We seek to embed positive mental health and mental health awareness through our academy to create a culture where pupils can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PSHE schemes.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the referral mechanisms listed within this policy and speaking to the designated safeguarding lead or a deputy.

Please see [Appendix 2](#) for the overview of our mental health strategy.

#### Useful information

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

<https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview>



## 6 | Children with Special Educational Needs (SEN) and Disabilities

- 6.1 Children and young people with SEN and disabilities can face additional safeguarding challenges as:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
  - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
  - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
  - communication barriers and difficulties in managing or reporting these challenges.
- 6.2 Safeguarding training for staff and volunteers reminds staff of the additional barriers that some pupils face and offers guidance on how to mitigate this by increased awareness and consideration of those barriers.
- 6.3 We identify and support pupils who might need more support in their awareness of issues and ability to safeguard themselves.

## 7 | Recruitment of Staff and Volunteers

- 7.1 We will ensure that the statutory Safer Recruitment practices are always followed (*KCSIE 2021*).
- 7.2 Every interview panel will have at least one member who has a certificate in Safer Recruitment. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process.
- 7.3 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.
- 7.4 We will ensure that any alternative provision facility working with the academy provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.

- 7.5 Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.
- 7.6 We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.
- 7.7 The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. We will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.
- 7.8 The types of checks undertaken will be in accordance with the guidance given in the *Keeping Children Safe in Education* (September 2021) document.
- 7.9 Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in the *Keeping Children Safe in Education* (September 2021) document.
- 7.10 Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.
- 7.11 The academy leaders will always ask for written information about previous employment history and check that information is not contradictory or incomplete. Reference will be sought on all shortlisted candidates, including internal ones, before interview, so that any issues or concerns they raise can be explored with the referee and taken up with the candidate at interview. (Unless in some instances where candidates have expressly denied permission for the employer to approach their referees). In these cases, references will be taken up before the candidate's appointment.
- 7.12 The academy leaders will keep a single central record in accordance with the regulations given in *Keeping Children Safe in Education*.
- 7.13 Recruitment and employment checks will be undertaken as stated in *Keeping Children safe in Education*.
- 7.14 We reserve the right to carry out all relevant and necessary checks if there is concern about an existing member of staff and will refer to the LADO and DBS and other relevant agencies anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

## 8 | Managing Allegations Against Staff and Volunteers

- 8.1 We will prevent people who pose risks to children from working in our academy by ensuring that all individuals working in any capacity at our academy have been subjected to safeguarding checks in line with the statutory guidance *Keeping Children Safe in Education*.
- 8.2 We recognise the possibility that adults working in the academy may harm children. Any concerns (allegations or low level) about the conduct of adults in the academy (including supply staff and volunteers and contractors) should be taken to the Principal without delay (or where that is not possible to the LADO and the Director of Safeguarding ([sarah.bloomer@attrust.co.uk](mailto:sarah.bloomer@attrust.co.uk))).
- 8.3 Any concerns about the principal should go to the Chair of the Local Governing Board who will ensure that appropriate actions and referrals are followed/made to the LADO and the Director of Safeguarding. If for any reason you cannot make a referral through these routes you have a duty to refer directly to the Local Authority Designated Officer (LADO).
- 8.4 Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children or the staff member are protected.
- 8.5 Where a pupil makes an allegation against a staff member, supply teacher or volunteer, the allegation will be taken seriously and acted upon immediately. Parents will be contacted as soon as reasonably possible. The pupil will be offered support and their wishes will be carefully considered before any actions related to said pupil begin.
- 8.6 Where any member of the academy staff or any volunteer has concerns that a person has caused harm or poses a future risk of harm to vulnerable groups, including children they must act in accordance with the Allegations against staff section of the *Staff Disciplinary Policy and Procedure*.
- 8.7 Under our duty of care for our employees, we will ensure that we provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The academy leaders will ensure its obligations for confidentiality when an allegation has been made.

## 9 | Safeguarding Training

- 9.1 All staff (including non-teaching and volunteers) must annually undertake the core Child Protection and Safeguarding training. This is recorded and logged. All staff are informed clearly on how to report anything of concern to the DSL, (*insert name*) immediately. See [Appendix 1](#) for a flow diagram of how concerns are dealt with at the academy.
- 9.2 All new members of staff, including newly-qualified teachers and teaching assistants, will be given an induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the safeguarding and child protection policy, behaviour for learning policy, staff code of conduct, systems and processes for CME and *Keeping Children Safe in Education: Statutory Guidance for Academies and Colleges, Part One* (September 2021), and other related policies.
- 9.3 The DSL will undergo updated child protection training for DSLs every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.
- 9.4 All staff members will undergo safeguarding and child protection training (whole-academy training) which is regularly updated.
- 9.5 All local governors must undergo governor specific online awareness training at least every two years and core safeguarding training at least annually.
- 9.6 Staff members who miss the whole-academy training will be required to undertake other relevant training to make up for it, e.g. by joining another academy's whole-academy training or completing online modules identified by the DSL as appropriate.
- 9.7 We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-academy training if it takes place during their period of work for the academy.
- 9.8 The DSL will provide at least an annual briefing to the academy on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews.
- 9.9 The academy leaders will maintain accurate records of staff induction and training.

## 10 | Establishing a Safe Environment in which Children Can Learn and Develop

**10.1** We recognise that because of our day to day contact with pupils, we are well placed to observe the outward signs of abuse. We therefore establish a safe environment where pupils feel secure and are encouraged to talk openly and are listened to.

**10.2** We are thoroughly committed to teaching all our pupils about risks and place emphasis on them learning about how to minimise risk. This is done through our (add or delete as needed to reflect your setting) CPRE programme and through the academy engaging in national and local initiatives such as; anti-bullying awareness days, e-safety programmes, and other programmes which raise their awareness and increase their understanding.

### **10.3 Anti-Bullying and Peer-on-Peer Abuse**

- We actively seek to raise awareness of and prevent all forms of peer-on-peer abuse by educating governors, our senior leadership team, staff, pupils, and parents about this issue.
- This includes training governors, the senior leadership team, and staff on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify, and respond to it.
- Please refer to the peer-on-peer abuse policy for more information about how we prevent bullying and wider forms of peer-on-peer abuse.
- If any pupil / member of staff / parent / carer has a concern about bullying, they should report it to a member of staff.

### **10.4 E-Safety**

- We are thoroughly committed to improving pupil's e-safety awareness. Our acceptable use agreement is signed up to by all pupils/ parents and staff and we ensure that this is revisited annually in September with the welcome back.
- If a pupil, parent/carers or member of staff has a concern relating to e-safety they are encouraged to report it. They can report it directly to their academy. Please refer to the E-safety Policy.

### **10.5 Photography and Images**

- The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.
- To protect pupils, we will:
  - Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
  - Seek parental consent
  - Use only the pupil's first name with an image
  - Ensure pupils are appropriately dressed

- Encourage pupils to tell us if they are worried about any photographs that are taken of them.
- Parents, carers or relatives may only take still or video photographic images of pupils in the academy or on academy-organised activities with the prior consent of the academy and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

## 11 | Confidentiality and Sharing Information

**11.1** Staff should only discuss concerns with the DSL, Principal or chair of the LGB (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

**11.2** All staff will understand that **child protection issues warrant a high level of confidentiality**, not only out of respect for the pupil and staff involved but also to ensure that anything being released into the public domain does not compromise evidence.

**11.3** We will act in accordance with *GDPR* (2018).

### **11.4 Storage and Handling of Records**

Child protection information will be stored and handled in line with the principles set out in the *Data Protection Act* (1998) and the *GDPR* (2018) and the academy's ***Data Protection Policy***.

*The Data Protection Act* and *GDPR* do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will never be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Paper records of concern forms and other written information will be stored in a locked facility accessed only by the DSL and those identified as appropriate within the academy. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive; these items will also be password protected and kept in locked storage.

Child protection information will be stored separately from the pupil's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy, they will be sent separate from the pupil's file and under a confidential cover or in an encrypted electronic file.

Child protection records are normally exempt from the disclosure provisions of the *Data Protection Act*, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Principal or DSL. The *Data Protection Act* does not

prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child.

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the *Data Protection Act* and the *GDPR*. This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as ‘special category personal data’.
- Understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but 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.
- For schools, not providing pupils’ personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the **serious harms test** is met, they must withhold providing the data in compliance with schools’ obligations under the *Data Protection Act* and the *GDPR*. Where in doubt schools should seek independent legal advice.

Link to serious harm test:

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-the-harm-test>

Link to new data protection tool kit for schools:

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

## 12 | Management of the Policy

- 12.1 Academy leaders will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the *Education Act* (2002), the *Education (Independent Academy Standards) Regulations* (2014) and the *Education (Non-Maintained Special Academies) (England) Regulations* (2011), *Keeping Children Safe in Education: Statutory Guidance for Academies and Colleges* (September 2021) and the departmental advice *What to Do if You are Worried a Child is Being Abused – Advice for Practitioners* (September 2016). Nothing written in this policy overrides the academy’s duties under such legislation.
- 12.2 The LGB will oversee the policy, ensure its implementation and review its content on an annual basis.
- 12.3 The Principal will report on safeguarding activity and progress within the academy to the LAC at least annually.

# Appendix 1- Raising Concerns About a Child

## Raising Safeguarding Concerns about a Child- Flowchart

