

1 INTRODUCTION

This policy provides a framework to guide academy leaders and staff in Great Academies Education Trust academies and strengthen decision-making as they work to safeguard pupils.

Our approach to safeguarding is informed by:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019

Statutory guidance

- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2020) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'
- The Great Academies Education Trust (GAET) values

2 PURPOSE AND OBJECTIVES

Purpose

This policy aims to ensure that The Trust and its academies safeguards and promotes the welfare of all of the pupils.

Objectives

The objectives of this policy are to

- Support academy leaders in complying with legislation and guidance related to safeguarding including child protection

- Ensure robust procedures are in place as described in this policy and at each academy to safeguard and protect pupils from harm, in all its forms, including abuse and neglect, and specific risks such as
 - radicalisation,
 - female genital mutilation (FGM) and honour-based abuse,
 - forced marriage,
 - child sexual exploitation,
 - child criminal exploitation,
 - the risk of missing education (Children Missing Education, CME),
 - peer-on-peer abuse including sexual harassment and violence, youth produced sexual imagery (sexting).
- Make all staff and stakeholders aware of their responsibilities in safeguarding pupils, and what actions they need to take to do this.

3 GUIDING PRINCIPLES

This policy is guided by key legislative duties, national guidance and the GAET vision and values

Key Legislative Duties and national guidance

The duty to children: Everyone who works with children has a responsibility to keep them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. In order to ensure our pupils are safe, we work in line with national guidance including "Working together to safeguard children" HM government 2018 and "Keeping Children Safe in Education" DfE 2020. In line with the Children Act 2004 and the Children, Schools and Families Act 2010 we have a duty to share early concerns about safety and welfare of children with appropriate agencies and to ensure preventative action before a crisis develops.

GAET Vision and Values

Vision

"Great Academies Education Trust will be a truly outstanding, outward facing multi-academy trust supporting its academies, from their starting points, to become outstanding.

All pupils will make exceptional academic progress in all subjects and regardless of age or stage will be work and college ready.

Our academies will be places where pupils are valued as individuals, where they will have opportunities to achieve highly, lead strongly and develop into confident, responsible and successful young adults."

In implementing this policy, the Trust and its employees will work with all other relevant agencies to develop outstanding safeguarding procedures. By implementing the procedures, pupils will be listened to and kept safe from harm. They will be supported to make progress, achieve and develop into resilient, confident, responsible and successful young adults.

Values

"All individuals will embody our values

Genuine - mutually trusting, open, honest and reflective.

Respect(ful) to all.

Excellent at what they do, striving for excellence and intolerant of mediocrity.

Achievement focussed-understanding that academic excellence is the goal and high aspirations key to each pupil achieving their academic potential .

Together-believing that we can make the biggest difference when we work as a strong team.”

In implementing this policy, all pupils, parents, staff and stakeholders will be involved, as appropriate in genuine conversation and decision-making. Conversations will include respectful challenge and will be honest and reflective. The procedures to safeguard pupils will always challenge mediocrity and strive for excellence. By safeguarding our pupils they will be enabled to achieve the highest academic standards possible. GAET staff will work together with each other, and other agencies, to focus on the best possible well-being and academic outcomes for pupils.

4 EQUALITY

Great Academies Education Trust ensures that all pupils are safeguarded. We do not discriminate against anyone on the grounds of their sex, race, colour, religion, nationality, ethnic or national origins. This is line with the Equality Act 2010 and covers both direct and indirect discrimination.

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5 IMPLEMENTATION GUIDANCE

5.1 Definition of safeguarding

Safeguarding is a term which is broader than ‘child protection’ and relates to the action the Trust takes to promote the welfare of children and protect them from harm. Safeguarding is everyone’s responsibility. Safeguarding is defined in Working together to safeguard children 2018 as:

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

5.2 Other Trust policies

The following Trust policies and procedures should be followed in relation to key aspects of safeguarding:

Keeping staff safe – Staff code of conduct

Recruitment of suitable staff – Recruitment policy and Managing Recruitment procedure

Responding to allegations – Trust procedure for managing allegations against staff

Bullying including cyber bullying – Trust anti-bullying policy

Safe use of ICT – Trust ICT and e-safety policy

Visits and trips – Trust educational visits policy

5.3 General practice in safeguarding

5.3.1. Pupil information

The Academy will endeavour to keep up to date and accurate information in order to keep pupils safe and provide appropriate care for them. The Academy requires accurate and up to date information regarding:

- names and contact details of persons with whom the child normally lives;
- names and contact details of all persons with parental responsibility (if different from above);
- at least two emergency contact details (if different from above);
- details of any persons authorised to collect the pupil from the Academy (if different from above);
- any relevant court orders in place including those which affect any person's access to the child (e.g. Children and Families court order, Injunctions etc.);
- whether the child is or has been subject to a Child Protection Plan or CAF;
- name and contact detail of G.P.;
- any other factors which may impact on the safety and welfare of the child.

For pupils first entering a UK school (i.e. into Nursery or Reception, or from another educational system at a non-routine time of admission, once admission has been offered, admission authorities may ask for proof of birth date, but must not require a 'long' birth certificate or other documents which would include information about the pupil's parents.

In the case of previously looked after children, admission authorities may request a copy of the adoption order, child arrangements order or special guardianship order and a letter from the local authority that last looked after the child before any order was made.

The Academy will collate, store and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting data protection and safeguarding requirements.

5.3.2 Communication

A Designated Safeguarding Lead (DSL) is established in each academy. The DSL is a member of the Senior Leadership Team. Deputy DSLs are identified. The name of the designated members of staff for safeguarding will be clearly visible in each academy, with a statement explaining the academy's role in referring and monitoring cases of safeguarding concerns. All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of the Trust's Safeguarding & Child Protection Policy, and reference to it in Parents' information such as prospectus or handbook.

5.3.3 Raising safeguarding concerns

All staff will know how to identify, raise, record and refer safeguarding concerns, including child protection concerns. They will be aware of the difference between children who are of concern, and those in immediate danger or at risk of harm. The DSL will ensure that all staff understand how to raise and record all concerns. All members of staff, supply staff, governors and volunteers are provided with child protection awareness information at induction, included in their arrival pack, the academy safeguarding procedures so that they know who to discuss a concern with.

5.3.4 Acting on concerns

The DSL will ensure that relevant procedures are used for providing support for children at risk of harm or known to be subject to abuse. The DSL is the point of contact for all child protection concerns, including those related to fabricated or induced illness (FII), child sexual exploitation (CSE), forced marriage, honour-based abuse including female genital mutilation (FGM) and the risk of radicalisation. The appropriate methods for escalation of concerns will be used. This will often involve significant multi-agency involvement as described in national and local guidance.

Allegations of abuse against staff

All allegations against staff, supply staff and volunteers, will be dealt with in line with the school's Managing allegations against staff policy– a copy of which will be provided to, and understood by, all staff.

The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When using an agency to access supply staff, the school will inform them of its processes for managing allegations, including any updates to the relevant policies, and liaise with the agency's human resources manager/provider where necessary.

When an allegation is made, an investigation will be carried out to gather enough evidence to establish whether it has a foundation, and the school will ensure there is sufficient information to meet the [DBS referral criteria](#).

On conclusion of a case, where an individual is removed from regulated activity – this could be due to suspension, redeployment to work that is not in regulated activity, dismissal or resignation – the school will refer the case to the DBS as soon as possible.

If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to CSCS.

The school will preserve records which contain information about allegations of sexual abuse for the Independent

5.3.5 Recording

All staff will be made aware of the necessity to make accurate and timely records relating to safeguarding. Academy-based induction and training will cover the procedures for making and retaining records.

5.3.6 Training

The role of the designated safeguarding lead carries a significant level of responsibility and they are given the additional time, funding, training, resources and appropriate supervision support that they need to carry out the role effectively. DSLs undertake relevant training, and biennial updates. All new members of staff, temporary staff and supply staff will be given a copy of the Safeguarding and Child Protection Policy and Procedures, with the DSL's and deputy DSL's names clearly displayed, as part of their induction into the academy. All members of staff and governors are trained in and receive regular updates in safeguarding, including child protection, e-safety and the Prevent duty.

5.3.7 Supporting pupils

We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the academy may provide the only stability in the lives of children who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn. We recognise that abuse is not always perpetrated by adults, and that children and young people can be at risk of peer-on-peer abuse.

Our academies will support all pupils by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, and not condoning aggression or bullying;
- Enabling them to recognise when they are at risk and how to get help when they need it;
- Providing a curriculum which enables pupils to identify the possible risks to themselves including on-line risks and peer-on-peer abuse and that makes it clear that abuse should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”;
- Ensuring the curriculum related to safeguarding, and the support provided for pupils, takes into account the wider environmental factors in a child’s life (contextual safeguarding);
- Promoting a caring, safe and positive environment within the academy;
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children;
- Considering the need for appropriate assessments such as through the use of the Common Assessment Framework, CAF or similar methodology when it is identified that there are low level concerns or emerging need;
- Notifying Social Care as soon as there is a significant concern;
- Providing continuing support to a pupil about whom there have been concerns who leaves the academy by ensuring that appropriate information is copied under confidential cover to the pupil’s new setting and ensuring the academy medical records are forwarded as a matter of priority;
- Undertaking appropriate risk assessments to ensure the safety of vulnerable pupils in academy;
- Recognising that there may be particular groups of pupils at risk of harm and requiring Early Help or other interventions. Staff should be particularly alert to the potential need for early help for a pupil who:
 - is disabled and has specific additional needs
 - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
 - is a Looked After Child (LAC)
 - is a young carer
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - is frequently missing/goes missing from care or from home
 - is at risk of modern slavery, trafficking or exploitation
 - is at risk of being radicalised or exploited
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing drugs or alcohol themselves
 - has returned home to their family from care

- is a privately fostered child

5.3.8 Confidentiality

We recognise that all matters relating to safeguarding and child protection should be subject to appropriate confidentiality. The Principal or DSLs will disclose any information about a pupil to other members of staff on a need to know basis only. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

NB All staff must be aware that they cannot promise a pupil to keep secrets which might compromise the child's safety or wellbeing.

5.3.9 Supporting staff

We recognise that staff working in the academy who have become involved with a pupil who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

Safeguarding Children supervision can help practitioners to keep a focus on the child, to avoid delay in action, to maintain objectivity and to address the emotional impact of the work. Safeguarding supervision support will be provided for DSLs through the Trust. It is the responsibility of the Designated Safeguarding Lead to provide support, supervision for any member of staff with particular responsibility for safeguarding. The Model of Supervision used is described in the Trust's safeguarding supervision procedure.

5.3.10 Disciplinary Procedures

All staff will understand that non-adherence to the Trust's Safeguarding and Child Protection Policy could mean that they are in breach of The Trust's Disciplinary Policy. Each academy will implement the Trust's Disciplinary Policy for any member of staff causing significant concern in respect of their implementation of the Safeguarding and Child Protection Policy. Any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS) for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer.

5.3.11 Other people using our facilities

Our lettings procedures will seek to ensure the suitability of adults working on academy sites at any time. All users of our facilities must provide written confirmation that they have their own relevant safeguarding policies and procedures, including safer recruitment.

5.3.12 Alternative provision and work experience

The school will remain responsible for a pupil's welfare during their time at an alternative provider. Where pupils are placed in alternative provision or on work experience, all providers must provide written confirmation that they have their own relevant safeguarding policies and procedures, including safer recruitment.

5.3.13 Home-stays (Exchange Visits)

Where children from overseas are staying with UK parents as part of an exchange organised by the academy, those parents will be deemed to be in 'Regulated Activity' for the duration of the stay and as such will require to submit an enhanced DBS check including barring check. As a volunteer, all checks will be processed free of charge by the DBS. Where additional people in the host family are aged over 16 (i.e. elder siblings) the academy will consider on a case by case risk assessment basis whether such checks are necessary.

5.3.14 Children with Family Members in Prison

Pupils with a family member in prison will be offered pastoral support as necessary.

They will receive a copy of '[Are you a young person with a family member in prison](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

5.4 Child protection

5.4.1 Indicators of abuse and neglect

All academy staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: A form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g. via the internet.

Physical abuse: A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: A form of abuse that involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.

Sexual abuse: A form of abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether or not the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways

Neglect: A form of abuse that involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

5.4.2 Listening to disclosures

Disclosures or information may be received from pupils, parents or other members of the public. The Academy recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly all staff will handle disclosures with sensitivity. Such information cannot remain confidential and staff will immediately communicate what they have been told to the Designated Safeguarding Lead and make a record using the agreed academy system.

Principles:

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the Designated Safeguarding Lead in order that (s)he can make an informed decision of what to do next.

Staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm;
- clarify the information;
- try to keep questions to a minimum and of an 'open' nature e.g. 'Tell me what happened?' rather than 'Did x hit you?';
- be particularly aware of the development stage of very young children, for example in asking about when an event took place, as their understanding of time may influence how they answer,
- try not to show signs of shock, horror or surprise;
- not express feelings or judgements regarding any person alleged to have harmed the child;
- explain sensitively to the person disclosing that the information must be referred to the Designated Safeguarding Lead;
- reassure and support the person as far as possible;
- explain that only those who 'need to know' will be told;
- explain what will happen next and that the person will be involved as appropriate.

5.4.3 Radicalisation

For the purpose of this policy, we have used the following definitions:

- **“Radicalisation”** refers to the process by which a person comes to support terrorism and extremist ideologies
- **“Extremism”** refers to the vocal or active opposition to fundamental British values, e.g. individual liberty and the rule of law
- **“Terrorism”** refers to an action that endangers or causes serious violence to a person or people, property, or electronic system, which is designed to influence the government, intimidate the public, or advance a cause.

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.

The school will actively assess the risk of pupils being drawn into terrorism.

Staff will be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection.

Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.

Any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

Training

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

Risk indicators of vulnerable pupils

Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis include the following:

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances includes the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life

Indicators of vulnerability through criminality:

- Experiences of dealing with the police
- Involvement with criminal groups

Making a judgement

When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences?

- Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil sympathise with or support illegal/illicit groups?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Has the pupil witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the pupil travelled for extended periods of time to international locations?
- Has the pupil employed any methods to disguise their identity?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?
- Is the pupil the victim of social isolation?
- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?

Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

Channel

Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable pupil is at risk of being involved in terrorist activities.

In cases where the school believes a pupil is potentially at serious risk of being radicalised, the headteacher or DSL will contact the Channel programme.

The DSL will also support any staff making referrals to the Channel programme.

The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.

The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

The school will keep in mind that an individual's engagement with the Channel programme is voluntary at all stages.

Building children's resilience

The school will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside pupils' spiritual, moral, social and cultural development.
- Allow pupils time to explore sensitive and controversial issues.
- Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach pupils about how democracy, government and law making/enforcement occur.
- Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

The school will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements

- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The [Educate Against Hate](#) website

5.4.4 Female genital mutilation (FGM)

For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs.

All academy staff must be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they must share this information with social care or the police.

Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the child may not yet be aware of the practice or that it may be conducted on them, so it is important for staff to be sensitive when approaching the subject.

If a member of academy staff has a concern, they should activate local safeguarding procedures.

As of October 2015, Section 75 of the Serious Crime Act places a statutory duty upon teachers to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under 18. Teachers failing to report such cases will face disciplinary action.

Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must report to the police where an act of FGM appears to have been carried out.

FGM is also included in the definition of 'honour-based' abuse (HBA), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

Identification: The factors outlined below, collectively or individually, may be an indication that a young person is at risk of FGM

- The socio-economic position of the family and their level of integration into UK society
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE

Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk

- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

5.4.5 Forced marriage

Definition: In forced marriage, one or both spouses do not consent to the marriage and some element of duress is involved. Duress includes both physical and emotional pressure and abuse.

Forced marriage is primarily, but not exclusively, an issue of violence against females. Most cases involve young women and girls aged between 13 and 30, although there is evidence to suggest that as many as 15 per cent of victims are male. These procedures are aimed at dealing with forced marriage for a child/young person under 18 years of age.

Forced marriage is a human rights abuse. It can constitute both child abuse and sexual abuse. The United Nations considers it a form of trafficking, sexual slavery, and exploitation. Some, however, still see it as a private, personal, domestic, family, religious, or cultural issue.

A clear distinction must be made between a forced marriage and an arranged marriage. The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the child/ young person.

Indicators that a child/young person is at risk of/subject to forced marriage

Identification: The factors outlined below, collectively or individually, may be an indication that a young person fears they may be forced to marry, or that a forced marriage has already taken place. (It should not however be assumed that a young person is facing forced marriage simply on the basis that they present with one or more of these factors)

- Family History:
 - Siblings forced to marry;
 - Family disputes;
 - Domestic violence and abuse;
 - Running away from home;
 - Unreasonable restrictions e.g. house arrest;
- Education:
 - Truancy;
 - Low Motivation/changes in motivation;
 - Poor exam results;
 - Withdrawal from school life;
- Health:
 - Self-harm;
 - Attempted suicide;
 - Eating disorders;
 - Depression;
 - Isolation;
- Employment:
 - Poor performance;
 - Poor attendance;
 - Limited career choices;
 - Not allowed to work;
 - Unreasonable financial control e.g. confiscation of wages/income.

Taking action

Where an academy suspects a forced marriage is likely to occur, staff should refer to Greater Manchester LSCB guidance, to be found at

http://greatermanchesterscb.proceduresonline.com/chapters/p_force_marriage.html

5.4.6 Child sexual exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where a child may receive something, such as food, gifts or in some cases simply affection, as a result of engaging in sexual activities.

CSE can take many forms but the perpetrator will always hold some kind of power over the victim. It is important to note that some young people who are being sexually abused do not exhibit any external signs of abuse.

Academies should adopt the following procedure for handling cases of CSE, as outlined by the DfE:

Step one – Identifying cases

Academy staff members will be aware of and look for the key indicators of CSE, these are as follows:

- Going missing for periods of time or regularly going home late
- Regularly missing school
- Appearing with unexplained gifts and new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Undergoing mood swings or drastic changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Suffering from sexually transmitted infections or becoming pregnant

Step two – Referring cases

Where CSE, or the risk of it, is suspected, staff will refer the information to the designated safeguarding lead for child protection (DSL). If after discussion and reflection a concern still remains, local safeguarding procedures will be triggered, including referral to Children's Social Care.

Step three – Support

The LA and all other necessary authorities will then handle the matter to conclusion. The academy will cooperate as needed.

5.4.7. Child criminal exploitation (CCE)

For the purpose of this policy, "child criminal exploitation" is defined as: where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, for any, or all, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

CCE may be in effect even if the criminal activity appears consensual and can happen through the use of technology.

Identifying cases

School staff will be aware of the following indicators that a child is the victim of CCE:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education or not taking part

5.4.8 County Lines

For the purpose of this policy, “**County lines**” refers to organised criminal networks or gangs exploiting children to move drugs and money into one or more areas (within the UK). Drugs and money may also be stored by children for the purpose of criminal activity.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.

Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Indicators that a pupil may be involved in county lines active include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

5.4.8 Mental Health

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

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional.

Staff will be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or a deputy.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

5.4.9 Homelessness

The DSL and deputy(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

5.4.8 Children missing from education

A child going missing from school is a potential indicator of abuse and neglect. Staff will monitor children that go missing from school, particularly on repeat occasions, and report them to the designated safeguarding lead – following normal attendance and safeguarding procedures.

In order to ensure accurate data is collected to allow effective safeguarding, the academy will inform the LA of any pupil who is going to be deleted from the admission register when they are about to remove a pupil’s name from the academy admission register under any of the fifteen grounds listed in the regulations. This duty does not apply when a pupil’s name is removed from the admission register at standard transition points – when the pupil has completed the final year of education normally provided by that academy – unless the local authority requests that such returns are to be made.

Where there is concern that a pupil may be at risk of being a child missing education, the relevant LA officers must be informed of any pupil who:

- Has been taken out of school by their parents and are being educated outside the school system, e.g. home education.
- Has ceased to attend school and no longer live within a reasonable distance of the academy.
- Has been certified by a doctor as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent

has indicated the intention to continue to attend the academy after ceasing to be of compulsory school age.

- Is in custody for a period of more than four months due to a final court order and we do not reasonably believe they will be returning to the academy at the end of that period.
- Has been permanently excluded.

The local authority must be notified when an academy is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that academies comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

5.4.9 Fabricated or Induced Illness (FII)

Absences from school can occur in different circumstances including legitimate medical and hospital appointments. Concerns that a child's illness may be fabricated or induced are most likely to come from health professionals. However, any agency in contact with a child may become concerned, for example education staff where a child is frequently absent from school on questionable health grounds or nursery staff may not observe fits in a child who is described by a parent to be having frequent fits etc.

If fabricated or induced illness by a carer is suspected, academies should verify the reasons for the child's absences. They should also determine whether reported illness is being used by the child, for example, to avoid unpopular lessons or being bullied. Such concerns should not be dismissed.

The presenting signs and symptoms need careful evaluation for a range of possible causes. Professionals must remain open minded to all possible explanations. The following are indicators that should alert any professional to concerns that a child is suffering, or at risk of suffering significant harm, as a result of having Illness Fabricated or Induced (FII) by their carer:

- A carer reporting symptoms and observed signs that are not explained by any known medical condition;
- A carer reporting to professionals that a diagnosis has been made by another professional when this is not true, and giving conflicting information to different professionals;
- Missed appointments especially if the appointments are not leading in the desired direction for the carer;
- Physical examination and results of investigations that do not explain symptoms or signs reported by the carer;
- The child having an inexplicably poor response to prescribed medication or other treatment, or intolerance of treatment;
- Acute symptoms that are exclusively observed by/in the presence of the carer;
- On resolution of the child's presenting problems, the carer reporting new symptoms or reporting symptoms in different children in sequence;
- The child's daily life and activities being limited beyond what is expected due to any disorder from which the child is known to suffer, for example, partial or no school attendance and the use of seemingly unnecessary special aids;
- Objective evidence of fabrication - for example, the history of events given by different observers appearing to be in conflict or being biologically implausible;
- The carer expressing concern that they are under suspicion of FII, or relatives raising concerns about FII;

- The carer seeking multiple opinions inappropriately.

In cases of suspected FII, discussing concerns with parents or carers prior to making a referral may place the child at increased risk. It is in the child's best interest that the parents/carers are not informed of the referral at this stage. A multi-agency decision of when and how parents will be informed of concerns will be made at a strategy meeting. An Individual Health Plan will provide invaluable evidence.

If you are concerned about FII, a referral should be made to Children's Social Care.

5.4.10 Peer on Peer Abuse including sexual violence and harassment and youth produced sexual imagery (sexting)

Keeping Children Safe in Education 2020 includes a section on peer-on-peer sexual violence and sexual harassment. Academies should follow this advice in relation to reported incidents. Peer-on-peer abuse is often of a "gendered nature", but it is not limited to the abuse of children of one sex on another. All such abuse is unacceptable and must be taken seriously.

Peer-on-peer abuse can be sexual violence and/or harassment, physical abuse, sexting (Youth produced sexual imagery), initiation/hazing type violence or rituals.

Decisions should be made on a case-by-case basis

The response to reports of peer-on-peer sexual violence and sexual harassment will be decided on a case-by-case basis with the designated safeguarding lead (DSL) taking a lead role, supported by other agencies as required.

The following is effective practice outlined in the part 5 of Keeping Children Safe in Education 2020.

Immediate response to a report

All staff should be trained to manage a report. This includes listening to the disclosure appropriately (see section 5.4.2). In addition, staff should not view any photos or videos of a sexual nature.

If a child may be in immediate danger or at risk of harm, there should be no delay in making a referral to children's social care. If an offence has been committed, it should be reported to the police.

If the DSL (or a deputy) isn't involved in the initial report, they should be informed as soon as possible.

Where there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk and needs assessment, considering:

- The victim, especially their protection and support
- The alleged perpetrator
- All other children at the academy (and adult pupils and staff, if appropriate), especially any actions that are appropriate to protect them

Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

Risk assessments should be recorded and kept under review.

The DSL (or a deputy) should engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers or sexual violence specialists will be required. The DSL (or deputy) should use these assessments to inform the academy's approach and update its risk assessments.

Managing the report

The DSL (or a deputy) is likely to be the most appropriate person to advise on the academy's response to the report.

How the report is managed, including when to inform the alleged perpetrator, will depend on a number of important considerations. Where a report is going to be made to children's social care and/or the police, as a general rule the academy should speak to the relevant agency to discuss next steps and how the alleged perpetrator will be informed.

There are four likely scenarios for your academy to consider when managing reports:

1. Manage internally, where this is considered appropriate in the circumstances, and early help or statutory interventions are not required
2. Early help, as outlined in chapter 1 of Working Together to Safeguard Children, where statutory interventions are not required
3. Referrals to children's social care, where a child has been harmed, is at risk of harm, or is in immediate danger
4. Reporting to the police (usually in parallel with a referral to children's social care), where a report of rape, assault by penetration or sexual assault is made.

Where scenarios involve working with children's social care, the academy should not wait for the outcome of an investigation before protecting the victim and other children. The DSL (or deputy) should work closely with children's social care to ensure the academy's actions do not jeopardise a statutory investigation. There should be immediate consideration for safeguarding the victim, alleged perpetrator and all other children.

Ongoing response

The victim

How the academy supports the victim will depend on:

- The age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse
- The needs and wishes of the victim

Academy staff should also be aware that victims may not disclose the whole picture immediately, so dialogue should be kept open and encouraged.

The alleged perpetrator

It can be difficult to balance the need to safeguard the victim (and other children) with providing the alleged perpetrator with an education and safeguarding support and implementing disciplinary sanctions.

The academy should consider support (and sanctions) on a case-by-case basis, considering:

- The age and developmental stage of the alleged perpetrator
- The nature of the allegations and risk of harm to other children
- Any unmet needs that the alleged perpetrator may have

Youth produced sexual imagery (sexting)

Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they take an explicit photo or video of themselves or a friend. Where there is a disclosure or the academy becomes aware that a pupil may have been involved in sending youth produced sexual imagery it will refer to the guidance in the document 'Sexting in Schools and Colleges, Responding to incidents and Safeguarding young people' published by the UK Council for Child Internet Safety (2016).

Staff understand that when an incident involving youth produced sexual imagery comes to their attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate academy staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

It is important that children and young people understand their school's policy towards youth produced sexual imagery. This reinforces the inappropriate nature of abusive behaviours and can reassure children and young people that their academy will support them if they experience difficulties or have concerns.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

A "specified purpose" is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

"Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school.

Any incidents of upskirting will be reported to the **DSL** who will then decide on the next steps to take, which may include police involvement.

Online Safety

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of the following:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a pupil's online activity

The school will ensure that suitable filtering systems are in place to prevent children accessing terrorist and extremist material, in accordance with the school's e-safety policy

The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what pupils can be taught regarding online teaching.

Further information regarding the school's approach to online safety can be found in the e-safety policy

Where pupils need to learn online from home, the school will support them to do so safely in line with the e-safety policy and government [guidance](#).

Remote education

Teachers will plan online lessons with the safety of pupils in mind

Staff communicating with pupils or parents via videocall will do so from within the school, or from a quiet room with a neutral background if working from home.

Teachers will ensure all online planning processes for pupils who are working online will have clear reporting routes to the school and external agencies so they can raise concerns whilst online.

The DSL will ensure every pupil has their contact information so they know how they can contact them about any safeguarding concern.

Pupils will be provided with online safety information by their teacher.

Pupils will be directed to practical online support, such as Childline, where they feel unsafe and require support outside of school.

Parents will be given a list of websites their child may access and any information regarding online sessions with staff that their child will be participating in.

Parents will be provided with the contact details of the DSL so they can report any concerns.

When communicating online, staff will:

- Communicate within school hours as much as possible.
- Communicate through the school channels approved by the SLT.
- Use school email accounts over personal accounts wherever possible.
- Use school devices over personal devices wherever possible.
- Not share personal information.

6 ROLES AND RESPONSIBILITIES

Safeguarding in GAET academies is everyone's responsibility. Everyone who works with pupils and their families – including academy staff, GPs, nurses, midwives, health visitors, early years professionals, youth workers, police, Accident and Emergency staff, paediatricians, voluntary

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

GAET

The Trust is responsible for

- ensuring there is a Safeguarding & Child Protection Policy together with a staff behaviour (code of conduct) policy across its academies;
- requiring its academies to use safer recruitment procedures including by ensuring that there is an appropriate policy in place, which lists the checks which must be undertaken on all employees, volunteers and third parties working in the academies, and by requiring there to be at least one person on every recruitment panel that has completed Safer Recruitment training;
- ensuring the Trust has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has already left the Trust's employment;
- nominating a trustee or officer to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against a Principal;
- ensuring the Safeguarding & Child Protection Policy is reviewed annually and that the Safeguarding & Child Protection Policy is available on each academy's website or by other means;
- requiring academies to ensure that pupils are taught about safeguarding, including on-line safety, this may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or through sex and relationship education (SRE);
- ensuring that the chair of trustees completes a suitability check with the ESFA as soon as they are appointed.
- ensuring that enhanced DBS checks are in place for governors;
- providing safeguarding supervision for DSLs
- ensuring any weaknesses in Child Protection are remedied immediately.
- To process a suitability check, the chair of governors will provide the EFSA with:
 - Information about their identity verified by a recognised professional, using the EFSA's [verification form](#).
 - Information confirming their right to work in the UK.
 - The outcome of an enhanced DBS check.
 - An overseas criminal records check or certificate of good character if they have lived outside of the UK.

Governing body and Principal

All members of the governing body and the principal understand and fulfil their responsibilities, namely to ensure that:

- the academy operates the Trust's safer recruitment procedures including by ensuring that there is at least one person on every recruitment panel who has completed Safer Recruitment training;
- the Single Central Record is complete and up to date;

- a senior leader has DSL responsibility and arrangements are in place for deputising;
- the local authority is informed of the named persons with DSL responsibility;
- on appointment, the DSL undertakes interagency training and also undertakes DSL 'new to role' and appropriate updates and other training as recommended by the LSCB, at least annually;
- each Deputy DSL is trained to the same level as the DSL;
- the DSL or a deputy is available to staff at all times during academy hours in term time;
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- all other staff have Safeguarding training updated as appropriate;
- the Safeguarding & Child Protection procedures (the academy's appendix to this policy) are reviewed annually;
- consideration is given to how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or through sex and relationship education (SRE).
- Each academy governing body will identify a named governor for safeguarding.

Designated Safeguarding Lead

The DSL must be a senior leader in the academy. Although an academy may have deputy DSLs, the overall responsibility may not be delegated.

The DSLs are responsible for:

1. Referring a pupil if there are concerns about possible abuse, to the Local Authority, and acting as a focal point for staff to discuss concerns. Referrals should be made by telephone to the Children's Duty Service and a record of the referral, including the nature of the concern, the date, time and name of referrer should be made and retained in the academy.
2. Act as the main point of contact with the three safeguarding partners and the child death review partner.
3. Understand when they should consider calling the police, in line with the National Police Chiefs' Council (NPCC) [guidance](#).
4. Ensure the best educational outcomes by identifying at-risk pupils to the school and its staff, so that the relevant personnel understand each pupil's educational and welfare needs.
5. Support teaching staff to identify the challenges that at-risk pupils may face and the additional academic support and adjustments they can make to support these pupils.
6. Keeping written records of concerns about a pupil even if there is no need to make an immediate referral.
7. Leading on decision-making regarding Early Help.
8. Ensuring that all such records are kept confidentially and securely and are separate from pupil records, until the pupil's 25th birthday, or 35th for a pupil with special educational needs, and are copied on to the pupil's next school or college. NB. Until the Independent Enquiry into Child Sexual Abuse has reached its conclusions, child protection records should be retained indefinitely.
9. Ensuring that a record is kept and witnessed of the disposal of individual's records. Files will be destroyed in accordance with data protection and other relevant legislative requirements and in accordance with the policy of the Trust as from time to time implemented.

10. Ensuring Children Looked After records are retained for 99 years.
11. Ensuring that an indication of the existence of the additional file in 3 above is marked on the pupil records.
12. Liaising with other agencies and professionals.
13. Ensuring that either they or the staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
14. Ensuring that any pupil currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.
15. Organising child protection induction, and update training every 3 years, for all academy staff, and arranging annual safeguarding updates for staff.
16. Providing, with the Principal, an annual report for the governing body, detailing any changes to the academy's procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and number of pupils subject to child protection plans (anonymised).

Other Academy staff

It is the responsibility of all academy staff to work within this policy and related procedures. In particular, all staff should be aware of how to identify and report concerns and how to support pupils who are at risk. All staff will participate in training as required. Each academy should determine the level of training required for individual staff members, based on their roles. All staff are required to read Part 1 of DfE guidance Keeping Children Safe in Education 2020 and those who work directly with children Annex A and to sign to confirm that have done this.

All staff must:

- Read the safeguarding policy and understand the academy's procedures (Academy appendix);
- know who the DSL and any deputies are in the academy;
- report all safeguarding concerns immediately to the DSL and understand who needs to be involved if a pupil tells them he/she is being abused or neglected (The data Protection Act 2018 and the GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe);
- receive appropriate safeguarding training that is regularly updated;
- receive safeguarding updates at least annually;
- understand the difference between a 'concern' about a child and a child 'in immediate danger or at risk of harm', and what they should do in either case;
- be aware of the early help process and be prepared to identify pupils who may benefit from early help;
- be aware of the process for making referrals to children's social care and the statutory assessment process under the Children Act 1989;
- record all safeguarding concerns, discussions and decisions in writing;
- understand the academy's behaviour procedures;
- Be aware that pupils with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of pupils.
- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs

- Communication barriers may exist with pupils with SEND, as well as difficulties in overcoming these barriers
- be aware of how to respond if they suspect a pupil may be missing from education;
- be alert to information which suggests that a child may be being privately fostered (living with someone other than a person with parental responsibility) and inform the DSL who will inform the LA.

In addition, all teaching staff must understand their legal duty to act in respect of any concerns about FGM.

Staff with responsibility for academy admissions should ensure there is more than one emergency contact number for each pupil.

Staff with responsibility for educational visits involving homestays should be aware of the relevant guidance within KCSIE 2020.

Parents/carers

- Parents/carers are made aware of this policy, including through its publication on each academy's website.
- Parents views are sought on how safe they feel their children are in the academy, including through questionnaires
- Any parent reporting concerns about the welfare of a child can expect to have their concerns taken seriously and to be confident that the concerns will be acted upon.
- Parents whose children are at risk (including those parents who may be putting their own children at risk by virtue of their actions or inaction) will be treated with respect and will be involved in the provision for their children. NB See specific guidance regarding children having Illness Fabricated or Induced (FII) by their carer, appendix 2.

Pupils

- Pupils are made aware of how to raise concerns about their own welfare and that of other children.
- Any pupil reporting concerns about the welfare of a child can expect to have their concerns taken seriously and to be confident that the concerns will be acted upon.
- Children who are at risk will be treated with respect and will be involved in decisions about the provision for them

7 LINKS TO OTHER POLICIES

This policy should be read in conjunction with national and local guidance and the following GAET/Academy policies:

- Anti-bullying policy
- Attendance policy
- Behaviour policy
- Curriculum policies including Sex and Relationships Education
- Disciplinary policy (staff)
- Educational visits policy
- ICT and e-safety policy
- Facilities management documentation including lettings arrangements
- Health and safety policy including education off-site and work placements
- Managing allegations against staff policy
- Record keeping policy

- Recruitment policy and Managing Recruitment procedure
- Staff code of conduct
- Whistleblowing policy

Contacts and Advice

Expert organisations

- [Barnardo's](#)
- [Lucy Faithfull Foundation](#)
- [NSPCC](#)
- [Rape Crisis](#)
- [University of Bedfordshire: Contextual Safeguarding](#)
- [UK Safer Internet Centre](#)

Support for victims

- [Anti-Bullying Alliance](#)
- [MoJ Victim Support](#)
- [Rape Crisis](#)
- [The Survivor's Trust](#)
- [Victim Support](#)

Toolkits

- [Brook](#)
- [NSPCC](#)
- [Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire](#)

Further information on confidentiality and information sharing

- [Gillick Competency Fraser Guidelines](#)
- [Government Information Sharing Advice](#)
- [Information Commissioner's Office: Education](#)
- [NSPCC: Things to Know and Consider](#)

Further information on sexting

- [UK Council for Child Internet Safety: Sexting Advice](#)
- [London Grid for Learning – Collection of Advice](#)

Support for parents

- [Parentzone](#)
- [Parentsafe – London Grid for Learning](#)
- [CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact](#)
- [CEOP Thinkuknow – Supporting Positive Sexual Behaviour](#)

Annex 1

Great Academies Educational Trust

**COVID-19 Limited Opening arrangements
for Safeguarding and Child Protection at
Silver Springs Primary Academy**

**Silver Springs Primary
Academy**

**Policy
owner: D
Mason**

**Date: 10 01
21**

Date shared with staff: 11 01 21

1. Context

From 5th January 2021 parents were asked to keep their children at home, wherever possible, and for schools to remain open only for vulnerable and the children of workers critical to the COVID-19 response.

Schools and all childcare providers were asked to provide places for a limited number of children - children who are vulnerable and those who have an EHCP, and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

This addendum of the Silver Springs Primary Academy Safeguarding and Child Protection policy contains details of our individual safeguarding arrangements in the following areas:

1. Context	2
2 Vulnerable children	3
3. Attendance monitoring	4
4. Designated Safeguarding Lead	4
5. Reporting a concern	5
6. Safeguarding Training and induction	6
7. Safer recruitment/volunteers and movement of staff	6
8. Online safety in schools and colleges	7
9. Children and online safety away from school and college	7
10. Supporting children not in school	8
11. Supporting children in school	9
12. Peer on Peer Abuse	9
13. Support from the Multi-Academy Trust	10

Key contacts

Role	Name	Contact number	Email
Designated Safeguarding Leads	Carolyn Hadfield	07746629017	carolyn.hadfield@silverspringsacademy.org.uk
Deputy Designated Safeguarding Lead	Mel Hmami	0161 338 2475	mel.hmami@silverspringsacademy.org.uk
	Paul Gladwell	0161 338 2475	paul.gladwell@silverspringsacademy.org.uk
	Olivia Chambers	0161 388 2475	olivia.chambers@silverspringsacademy.org.uk
Attendance Assistant	Lauren Gull	0161 338 2475	lauren.gull@silverspringsacademy.org.uk
Headteacher	Deborah Mason	07715179210	deborah.mason@silverspringsacademy.org.uk
Trust Safeguarding Manager	Brendan Loughran	07741019117	bloughran@gaet.com
Chair of Governors	Neil Crimes		neilcrimes@hotmail.com
Safeguarding Trustee	Annette Hall	0161 250 2598	annettehall08@gmail.com

Vulnerable Children

The definition of vulnerable children and young people includes children who have a social worker, an education, health and care plan (EHCP) or who may be vulnerable for another reason at local discretion ("otherwise vulnerable").

Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with parents, and will be strongly encouraged to take up a place in order to meet their needs. In addition to educational programmes this could include essential medical support. Where external partners are employed to support children with EHC plans SENCOs will arrange for the continuation of these programmes. e.g. Speech and Language plans, Physiotherapy, play therapy.

Eligibility for free school meals in and of itself is not the determining factor in assessing vulnerability.

Senior leaders, especially the Designated Safeguarding Lead (and deputy) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support.

Silver Springs Primary Academy will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead person for this will be: Carolyn Hadfield

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and the Designated Safeguarding Lead will explore the reasons for this directly with the parent and the social worker.

Where parents are concerned about the risk of the child contracting COVID19, the social worker and Designated Safeguarding Lead will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

Silver Springs Primary Academy will strongly encourage our vulnerable children and young people to attend a school.

Attendance monitoring

Silver Springs Primary Academy and social workers will agree with parents/carers whether children in need should be attending school – the attendance Assistant or Designated Safeguarding Lead will then follow up on any vulnerable pupil that they were expecting to attend, who does not.

How will this look in our school?

To support the above, Silver Springs Primary Academy will, when communicating with parents/carers and carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available. The Designated Safeguarding Lead will request up to date mobile telephone numbers for all social workers.

In all circumstances where a vulnerable child does not take up their place at school, or discontinues Silver Springs Primary Academy will notify their social worker.

Designated Safeguarding Lead

Silver Springs Primary Academy has two Designated Safeguarding Leads (DSLs) and two Deputy DSLs.

The Designated Safeguarding Leads are: Deborah Mason and Carolyn Hadfield

The Deputy Designated Safeguarding Leads are: Mel Hmami and Paul Gladwell

The optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone or online video - for example when working from home.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.

This might include updating and managing access to child protection online management system, MY CONCERN and liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the school Safeguarding Policy, this includes making a report via MY CONCERN, which can be done remotely.

In the unlikely event that a member of staff cannot access their MY CONCERN from home, they should email the Designated Safeguarding Lead, Headteacher **and** the Phase Leader. This will ensure that the concern is received.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff in school are concerned about an adult working with children in the school, they must report the concern to the headteacher immediately. If there is a requirement to make a notification to the headteacher when away from school, this should be done on the phone and followed up with a confidential email via Egress.

Concerns about the Headteacher's conduct should be directed to the Chair of Governors: Neil Crimes via email: neilcrimes@hotmail.com

The Multi-Academy Trust will continue to offer support in the process of managing allegations.

Safeguarding training and induction

DSL training is very unlikely to take place in person whilst there remains a threat of the COVID 19 virus.

For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

All existing school staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2020). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter Silver Springs Primary Academy, they will continue to be provided with a safeguarding induction.

If staff are deployed from another education or children's workforce setting to our school, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

For movement within the Trust, schools should seek assurance from the Multi-Academy Trust (MAT) HR Manager that the member of staff has received appropriate safeguarding training.

Upon arrival, they will be given a copy of the receiving setting's child protection policy, confirmation of local processes and confirmation of DSL arrangements.

Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, Silver Springs Primary Academy will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2020) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Where Silver Springs Primary Academy are utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Silver Springs Primary Academy will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE.

Silver Springs Primary Academy will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk

Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, Silver Springs Primary Academy will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE (2020).

Online safety in schools and colleges

Silver Springs Primary Academy will continue to provide a safe environment, including online. This includes the use of an online filtering system.

Where students are using computers in school, appropriate supervision will be in place.

Children and online safety away from school and college

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in the MAT code of conduct.

Silver Springs Primary Academy will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- No 1:1s, groups only
- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, NEVER in bedrooms; and the background should be blank, blurred or approved by the Headteacher if this is not possible.
- The lesson should be recorded so that if any issues were to arise, the video can be reviewed.
- Recorded classes should be kept to a reasonable length of time.
- Language must be professional and appropriate, this applies to any potential family members if in the background.
- Staff must only use platforms approved by the GAET ICT department to communicate with pupils
- Staff should record, the length, time, date of any sessions delivered live along with attendance.

Supporting children not in school

Silver Springs Primary Academy is committed to ensuring the safety and wellbeing of all its children and young people.

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person.

Details of this plan must be recorded on MY CONCERN, as should a record of contact have made.

The communication plans can include; remote contact, phone contact, kerbside visits, as long as social distancing measures are adhered to. Other individualised contact methods should be considered and recorded.

Author:	Version:	Date Approved:	Review Date:	Page 8 of 38
E Morris	V1.2	23.09.2020	23.09.2021	

Silver Springs Primary Academy and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

The school will share safeguarding messages on its website and social media pages.

Silver Springs Primary Academy recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers at Silver Springs Primary Academy need to be aware of this in setting expectations of pupils' work where they are at home.

Silver Springs Primary Academy will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded on MY CONCERN.

Supporting children in school

Silver Springs Primary Academy is committed to ensuring the safety and wellbeing of all its students.

Silver Springs Primary Academy will continue to be a safe space for all children to attend and flourish. The Headteacher will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

Silver Springs Primary Academy will refer to the Government guidance for education and childcare settings and continue to follow the direction from Public Health England on all 11 systems of control to limit the risk of spread of COVID19.

Where Silver Springs Primary Academy has concerns about the impact of staff absence – such as our Designated Safeguarding Lead or first aiders – will discuss them immediately with trust leaders.

Peer on Peer Abuse

Silver Springs Primary Academy recognises that during the closure a revised process may be required for managing any report of such abuse

Author:	Version:	Date Approved:	Review Date:	Page 9 of 38
E Morris	V1.2	23.09.2020	23.09.2021	

and supporting victims.

Where a school receives a report of peer on peer abuse, they will follow the principles as set out in part 5 of KCSIE (2020) and of those outlined within of the Child Protection Policy.

The school will listen and work with the young person, parents/carers and any multi- agency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded on MY CONCERN and appropriate referrals made.

Support from the Multi-Academy Trust

The Multi-Academy Trust (MAT) Central Safeguarding Team will provide support and guidance as appropriate to enable the DSL to carry out their role effectively.

This includes, remotely accessing Child Protection files for the purpose of quality assurance, support, guidance and direction.

The MAT will also provide regular group and individual supervision sessions. This may take the form of an online meeting.

Author:	Version:	Date Approved:	Review Date:	Page 10 of 38
E Morris	V1.2	23.09.2020	23.09.2021	