



Guru Nanak Sikh Multi Academy Trust

MAT Safeguarding & Child Protection Policy 2023-2024

Any reference in this policy to **parents** means;

- All natural, parents whether they are married or not
- Any person who has parental responsibility for a child or young person
- Any person who has care of a child or young person i.e. lives with and looks after the child

MAT means Multi Academy Trust

CONTENTS

1. Introduction	3
2. Context and Statutory Framework	5
3. Safeguarding Roles and Responsibilities	6
4. Reporting & Recording Arrangements	10
5. Safeguarding & Child Protection Procedures	12
6. Confidentiality	17
7. Training	18
8. Types of Abuse and Neglect	19
9. Child on Child Abuse	20
10. Sexual Violence & Sexual Harassment	22
11. Sharing of Nudes and Semi-Nudes (sexting)	24
12. Online Safety and the use of Mobile Technology	25
13. Complaints and Concerns About School Safeguarding Policies	27
14. Monitoring & Review	28
Appendix 1: DfE Guidance Keeping Children Safe in Education 2023 – Part 1	30
Appendix 2: Safeguarding Team Contact Details	31
Appendix 3: MAT Safeguarding Team Poster	32
Appendix 4: Procedure: Responding to Disclosures	33
Appendix 5: Safeguarding/Welfare Concern Form	36
Appendix 6: Types & Indicators of Abuse	37
Appendix 7: Annex B Specific Areas of Safeguarding	38
Appendix 8: Allegations of Abuse made against Staff	45
Appendix 9: Safer Recruitment	52

1. Introduction

This is a **statutory document** which promotes and supports the vision and values of Guru Nanak Sikh Multi-Academy Trust.

Vision: To provide an outstanding learning environment which challenges all of us to achieve our full potential and to continually share our knowledge and skills with the local and global community.

Values: The values of Guru Nanak Sikh Multi Academy Trust are encapsulated by the **SHARE** acronym. These values are at the heart of everything we do and describe the qualities our students/pupils and staff value most- Service to others, Humility, Achievement, Respect and Equality.

The purpose of this policy is to inform staff, parents, volunteers and Directors about the school's responsibilities for safeguarding our students/pupils, as well as to provide a clear understanding of how these responsibilities should be carried out.

Safeguarding and promoting the welfare of children is defined in the updated 2023 'Keeping Children Safe in Education' guidance (p6) as:

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

Core Safeguarding Principles

- It is a whole school responsibility to safeguard and promote the welfare of students/pupils, where all professionals should adopt a child-centred approach.
- All students/pupils regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All students/pupils have a right to be heard and to have their wishes and feelings taken into account.
- All staff understand safe professional practice and adhere to our code of conduct and other associated policies.
- All staff have a responsibility to recognise vulnerability in students/pupils and act on any concern in accordance with this guidance.

Child Protection Statement

Across the Guru Nanak Sikh Multi-Academy Trust we are committed to safeguarding and expect everyone who works in our school to share this commitment. We take all welfare concerns seriously and encourage our pupils/students to talk to us about anything that worries them. We will always act in the best interest of the child. We fully recognise our moral and statutory responsibility to safeguard and promote the welfare of all students/pupils and endeavour to provide a safe and welcoming environment where students/pupils are respected and valued. The procedures contained in this policy apply to all staff and directors and are consistent with those of the safeguarding procedures for children in the London Borough of Hillingdon and all other relevant local authorities.

Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to students/pupils who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

Policy Aims

- To identify the Safeguarding Team and explain their roles
- To provide all staff with the necessary information and a clear understanding of their roles and responsibilities with respect to safeguarding and their child protection responsibilities
- To outline the process to follow where there is a concern about the safety and welfare of a pupil across the Multi-Academy Trust
- To set out expectations in respects of training
- To outline how complaints against staff will be handled
- To state how the implementation of this policy will be monitored, whilst ensuring consistency and good practice.

Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and 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. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act

2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

2. Context and Statutory Framework

Context

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

This policy also complies with our funding agreement and articles of association.

This policy is one of a series in the school's integrated safeguarding portfolio. This policy should be read in conjunction with:

- Keeping Children Safe in Education (2023) - Part One & Annex B - **Appendix 1**
- MAT Staff Code of Conduct Policy
- Behaviour & Anti-Bullying Policy (for each phase)
- MAT Attendance Policy
- MAT Online Safety Policy

3. Safeguarding Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Directors in the schools and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)

- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

Guru Nanak Multi-Academy Trust has a Safeguarding Team. The designated senior person responsible is set in accordance with a designated lead for each school.

Designated Safeguarding Leads (DSL):

GNSA Secondary: Mr Thomas Perryman
GNSA Primary: Miss Alexandra O'Leary
Nanaksar Primary School: Miss Anushka Chatur

Designated Deputy Safeguarding Leads (DDSL):

Mrs Kulwinder Grewal
Mr Jatinder Dhillon

The **Designated Director** responsible for child protection and safeguarding is:
Mr Peter Ryerson

All Staff

All staff will:

- Read and understand Part 1 and Annex B of the Department for Education's updated statutory safeguarding 2023 guidance and review this guidance at least annually - **Appendix 1**.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
- Provide a safe space for students/pupils who are LGBT to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy/code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the behaviour policy, the online safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring and the safeguarding response to students/pupils who go missing from education.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a pupil tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection.

The welfare and safety of students/pupils are the responsibility of all staff and **ANY** concern for a student's/pupil's welfare **MUST** always be reported to the Designated Safeguarding Leads or Deputies immediately.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether students/pupils 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.

The Designated Safeguarding Leads (DSL)

The DSL members identified above are part of the senior leadership team and take lead responsibility for child protection and wider safeguarding. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL's are absent, the Deputy Safeguarding Leads identified above will act as cover. Additional staff are also Level 3 trained to support the safeguarding of pupils/students across the MAT, including the SENCO and Secondary phase Progress Leaders.

The safeguarding team can be contacted through the school office (in all three phases). If a specific member is not available, any other member of the team can be contacted. Contact details can be found in **Appendix 2**.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on pupil welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of pupils
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- Keep the Chief Executive Officer (CEO) informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL's are set out in their job description.

In recognising the need for the Multi-Academy Trust to offer out of hours support for staff the following advice is given;

- 'Imminent risk' child protection and safeguarding concerns should be directed to 999 with the appropriate emergency authority requested. (Imminent risk means that you deem the pupil to be at risk of immediate harm – in these cases do not put yourself or the pupil at any unnecessary risk. **Call 999 immediately** (if safe and feasible to do so) and follow the directions and advice given from the appropriate emergency service requested (dependant on the motivation for the call).
- Urgent child protection referrals, social care concerns, to be called in directly to the Local Authority in which the pupil resides.
- General child protection and safeguarding concerns can also be directed to the NSPCC on 0800 800 5000.
- Please be sure to update the designated safeguarding lead, accordingly, at the earliest possibility.

All stakeholders are made aware of who the members of the Safeguarding Team are, through posters which are displayed around the school and inserted in pupil diaries – see **Appendix 3**.

The Board of Directors

The Board of Directors will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a senior board level or link Director to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns

- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The Chair of Directors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All Directors will read Keeping Children Safe in Education in its entirety.

Section 7 of this policy (Training) has information on how Directors are supported to fulfil their role.

The Chief Executive Officer (CEO)

The CEO is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction and understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met and key persons are allocated to pupils in the Early years, where applicable

4. Reporting & Recording Arrangements

Staff, volunteers and Directors must follow the procedures set out below in the event of a safeguarding issue.

If a pupil is suffering or likely to suffer harm, or in immediate danger:

Make a referral to children's social care and/or the police **immediately** if you believe a pupil is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly.

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger):

Where possible, speak to the DSL first to agree a course of action and follow the reporting procedures outlined below.

If in exceptional circumstances a member of the MAT Safeguarding Team is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

If a pupil makes a disclosure to you:

If a pupil discloses a safeguarding issue to you, you should follow the principles of the 5 R's: **RECEIVE - REASSURE - RESPOND - REFER - RECORD.**

See **Appendix 4** for a poster on responding to safeguarding concerns and the procedure to follow.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

Staff must record any welfare concern that they have about a pupil/student on **'SafeguardMySchool' via ClassCharts (online recording tool)**. All staff will have access to their own log in details and a dashboard which enables them to complete the details of the disclosure, including a clear and comprehensive summary of the concern. Once the disclosure has been reported online, the safeguarding team are immediately alerted to take action and must record details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

If the situation is urgent you should take action immediately and complete the record after.

- All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded on 'SafeguardMySchool.'. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the Designated Safeguarding Lead or Deputy.
- In the event that a member of staff is unable to access the online reporting platform, Safeguarding/Welfare Concern Forms are easily accessible from the school office and shared area on staff network/intranet etc. This should be passed on without delay to a member of the Safeguarding Team – **Appendix 5**. Records should be completed as soon as possible after the disclosure/incident, signed and dated by the member of staff and the member of the Safeguarding Team.
- All records will 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.
- Safeguarding records are kept for individual students/pupils and are maintained separately from all other records relating to the students/pupils in the school.
- Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place

- when the child arrives, this should be within **5 days** for an in-year transfer, or within **the first 5 days** of the start of a new term. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- Any paper safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the Safeguarding Team in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Forms to be marked, 'Restricted.' Safeguarding records are shared with staff on a 'need to know' basis only.
- Every effort should be made to prevent unauthorised access and sensitive information should 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 should also be kept in locked storage.

Reporting systems for our pupils

It is essential that pupils have opportunities to express any worries or concerns, within a safe and comfortable environment.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

In addition to being aware of the identity of the MAT Safeguarding Team and speaking to staff members regarding concerns, students/pupils also have the opportunity to make disclosures online. 'Tootoot' launched across the Multi- Academy Trust in 2018, and is an online tool which enables pupils to share any concerns more discreetly. All concerns raised online are shared directly with the Safeguarding Team and actioned appropriately. Pupils also have posters displayed around the school and in their diaries to ensure that they know who they can speak to and assemblies are carried out frequently to remind them about the online and face to face platform that is available to them.

Notifying Parents / Carers

Where appropriate, we will discuss any concerns about pupils with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

If we believe that notifying the parents or carers would increase the risk to the pupil, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the students/pupils involved. We will think carefully about what information we provide about the others involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

5. Safeguarding & Child Protection Procedures

Early Help

If early help is appropriate, a member of the safeguarding team will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

A member of the safeguarding team will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Our school falls under the authority of the London Borough of Hillingdon. In the case of Early Help assessment referrals, the school would contact the Stronger Families Hub. For more information - [click here](#).

In line with the 2023 KCS guidance, a child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who (p9):

Is disabled or has certain health conditions and has specific additional needs as special educational needs (whether or not they have a statutory Education, Health and Care Plan)

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- Has a mental health need • is a young carer • is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Is persistently absent from education, including persistent absences for part of the school day.

If a staff member is aware of any concerns in relation to pupils/students requiring early help, it is their duty to report it to the local authority or a member of the safeguarding team.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Our school falls under the authority of the London Borough of Hillingdon. In the case of Early Help assessment referrals, the school would contact the Stronger Families Hub. For more information -

[click here](#). In the case of a student living outside the borough of Hillingdon the school would contact their respective borough MASH team.

Further information and guidance for students, staff and parents can be found in the Safeguarding and Wellbeing sections of the school website. - [Click here](#)

If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in **Appendix 7** of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

Must **immediately report this to the police, personally**. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures. The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

If you have concerns about extremism

If a pupil is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children’s social care. Make a referral to local authority children’s social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Directors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a pupil may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern about a pupil that is also a safeguarding concern, take immediate action and contact the DSL. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action.

There are a number of provisions in place across Guru Nanak Multi Academy Trust **to support pupils with their mental health and wellbeing**. If a pupil is worried about themselves or someone else they are encouraged to approach a member of the safeguarding team or their Progress Leader. All members of the safeguarding team and Progress Leaders Level 3 trained.

- Pupils are also encouraged to use the schools' safeguarding online reporting system 'Toot Toot' which is linked to the Progress Leaders and members of the safeguarding team.
- If the student is deemed to need further support they will be referred to a number of professional services which may be suitable. The Academy offers the services of a trained Counsellor who is an accredited member of the British Association for Counselling & Psychotherapy (BACP).
- We offer a triage service to make initial assessments of students wellbeing who are trained as Mental Health First Aiders.
- For those students who have suffered loss or bereavement the Academy offers a specialist program called Seasons for Growth. This program supports students in understanding and responding to the issues they may experience as a result of death, separation, divorce or any other significant change or loss in their lives and is delivered by a trained member of the safeguarding team.
- The Primary Phase delivers 'Zones of Regulation' across all classes which is a systematic, cognitive approach used to teach self-regulation by categorising all the different ways we feel and states of alertness we experience into four concrete coloured zones. The framework provides strategies for pupils to become more aware of and independent in controlling their emotions.
- The Primary Phase also delivers a range of nurture groups to raise self-esteem and promote the development of social skills.
- The Primary Phase has a wellbeing committee in place to support and promote mindfulness.
- Well-being surveys are conducted throughout the year and acted upon where concerns are raised.

Pupils with special educational needs, disabilities or health issues

We recognise that students/pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Any abuse involving students/pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes.

Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads.

Our DSL's for each phase are responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

As part of their role, they will:

- Ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

Concerns about a staff member, supply teacher, volunteer or contractor

Staff who are concerned about the conduct of a colleague towards a pupil/student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the pupil is paramount.

If you have concerns about an adult (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to a pupil, speak to the **CEO** as soon as possible. Please visit the admin office if you are unable to make contact with him for any reason. If the concerns/allegations are about the CEO/CEO, speak to the **Chair of the Board of Directors**. See contact details in **Appendix 2**.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the CEO, report it directly to the local authority designated officer (LADO).

See **Appendix 8** for further information and procedures on allegations of abuse made against staff. See Section 9 for child-on-child abuse and allegations of abuse made against other pupils.

The use of the school premises by other organisations

Where we receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, we will follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

6. Confidentiality

As part of meeting a child's needs, GNSA Multi-Academy Trust understands that it is critical to recognise the importance of information sharing between professionals and local agencies and will contribute to multi-agency working in line with Working Together to Safeguard Children. In addition to this:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of students/pupils
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent. If it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a pupil at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - A. Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - B. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - C. Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

7. Training

All Staff

All school staff will receive appropriate safeguarding training, so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow.

All members of staff will attend **annual safeguarding training**, in addition to Level 1 online training that all staff must complete. All training has been updated in line with the new Keeping Children Safe (KCS) guidance and includes reference to the child protection policy; the behaviour policy; the staff code of conduct; the safeguarding response to children who go missing from education; and the role of the designated safeguarding lead.

All staff members will receive appropriate training to ensure they are aware of a range of safeguarding issues and are aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and peer on peer abuse can put children in danger. The staff training will also include school responsibilities, the school's child protection procedures, online safety, safe working practice and external reporting mechanisms.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all pupils.

All staff will have training on the government's anti-radicalisation strategy, **Prevent**, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually through staff briefings. **MAT Safeguarding Bulletins** will be circulated to all staff half termly providing regular updates, reminders and scenarios to reinforce the whole school safeguarding culture throughout the MAT.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. Volunteers will receive appropriate training, if applicable.

The Safeguarding Team will ensure that all new staff and volunteers (including temporary staff) are appropriately inducted in line with the school's internal safeguarding procedures and communication lines. A summary safeguarding information sheet is available at the reception desks (of all three phases), to be given to staff and volunteers to support this process.

All staff members will also be made aware of the schools expectations regarding safe and professional practice via the Code of Conduct and as part of the training process.

Identified staff members from across the MAT have been trained in safer recruitment, and records are maintained for all members.

The Designated Safeguarding Leads & Deputies

Designated Leads and Deputies will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role, which will be formally updated **every two years**. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, attending Hillingdon cluster group meetings, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

The Designated Safeguarding Leads and CEO/CEO will provide an annual report to the Strategic Board, detailing safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained.

Directors

All Directors receive training about safeguarding and child protection at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

Recruitment

At least 1 person conducting any interview for any post across the MAT will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See **Appendix 9** of this policy for more information about our safer recruitment procedures.

8. Types of Abuse and Neglect

All staff across the Multi-Academy Trust should be aware of the definitions and signs and symptoms of abuse. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

For definitions and possible indicators and signs of abuse, see **Appendix 6** from the DfE guidance 'Keeping Children Safe in Education' 2023.

All members of staff are 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. Members of staff are aware that pupil welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. Abuse and neglect can happen over a period of time, but can also be a one-off event. This can have major long-term impacts on all aspects of a pupil's health, development and well-being.

In addition to the four categories above, members of staff need to be fully alert to the specific safeguarding areas identified within the new KCS Guidance (2023), **Annex B Further Information** (page 139) - **Appendix 7**.

9. Child on Child Abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a **zero-tolerance approach** to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse. **However, all child-on-child abuse is unacceptable and will be taken seriously.**

Most cases of pupils hurting other students/pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

Child-on-child abuse is most likely to include, but may not be limited to:

- **Bullying** (including cyber-bullying, prejudice-based and discriminatory bullying)
- **Abuse in intimate personal relationships between children** (this is sometimes known as 'teenage relationship abuse')
- **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 nude and semi-nude images** and/or videos (also known as sexting or youth produced 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).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out below - see reporting posters in **Appendix 4**.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Procedures for dealing with allegations of child-on-child abuse

If staff have any concerns about peer-on-peer abuse, or a pupil/student makes a report to them, they must **follow the procedures set out in this policy by following the 5 Rs**.

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will gain a statement of facts from the students
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all students/pupils involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The DSL will clearly record all incidents and all actions taken

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

We recognise the importance of taking proactive action to **minimise the risk of child-on-child abuse**, and of creating a supportive environment where victims feel confident in reporting incidents. We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils are able to easily and confidently report abuse using our reporting systems
- Ensuring staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

We will also ensure that staff are updated and receive appropriate safeguarding training that enables them to understand:

- How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports.
- That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of **“it could happen here.”**

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example: Children can show signs or act in ways they hope adults will notice and react to, a friend may make a report, a member of staff may overhear a conversation, a child's behaviour might indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly.

We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

10. Sexual Violence & Sexual Harassment

Sexual violence and sexual harassment can occur:

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

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

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

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out below - see reporting posters in **Appendix 4**.

The findings and recommendations from the June 2021 Ofsted '[Review of sexual Abuse in school and colleges](#),' have been shared with the MAT Safeguarding Team and are referenced below.

- A carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This should include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes'
- High-quality training for teachers delivering RSHE
- Routine record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse
- A behavioural approach, including sanctions when appropriate, to reinforce a culture where sexual harassment and online sexual abuse are not tolerated
- Working closely with LSPs in the area where the school is located so they are aware of the range of support available to children and young people who are victims or who perpetrate harmful sexual behaviour
- Support for designated safeguarding leads (DSLs), such as protected time in timetables to engage with LSPs
- Training to ensure that all staff (and Directors, where relevant) are able to:
 - better understand the definitions of sexual harassment and sexual violence, including online sexual abuse
 - identify early signs of peer-on-peer sexual abuse
 - consistently uphold standards in their responses to sexual harassment and online sexual abuse.

As a result, the following addendum must be followed by all staff to ensure that procedures are followed to protect the welfare of all pupils/students involved in cases of sexual violence and sexual harassment. The addendum includes:

Context

- What is Sexual Violence & Sexual Harassment
- Our Whole School Approach
- What to do if you have a concern or receive a report?
- Managing Reporting: Actions following a disclosure
- Safeguarding & Supporting the Victim
- Safeguarding & Supporting the Alleged Perpetrator
- Working with Parents and Carers
- pupil Voice

Sexual Violence & Sexual Harassment Addendum - click here:

[Sexual Abuse & Sexual Harassment- Staff Overview .pdf](#)

11. Sharing of Nudes and Semi-Nudes (sexting)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the CEO and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done in the first instance through the safer schools officer.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

Curriculum coverage

pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images.

Information regarding the sharing of nudes and semi-nudes is also shared with pupils, where age appropriate, so they are aware of the processes the school will follow in the event of an incident.

12. Online Safety and the use of Mobile Technology

Across GNSA Multi-Academy Trust, we recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of students/pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example: The safe use of social media, the internet and technology, Keeping personal information private, How to recognise unacceptable behaviour online, How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that: Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present, Staff will not take pictures or recordings of students/pupils on their personal phones or cameras
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students/pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Please see the online safety policy for further information.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

We recognise that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Filtering and Monitoring

At Guru Nanak Multi-Academy Trust, our network consists of both web filtering and monitoring systems. The terms filtering and monitoring are often used together in the [DFE standards](#) and in [Keeping Children Safe In Education](#). Both emphasise the importance of schools having appropriate systems in place to protect children from harmful content online. However it is important to recognize the difference between the two terms.

Filtering is all about the internet. It is a process of blocking or allowing access to specific websites or web pages. It is a binary system, meaning that a website is either allowed or blocked. Filtering can be used to block harmful content, such as offensive language, adult content, terrorism, violence, hate speech. It can also be used to block websites that are not appropriate for children, such as social media and chat sites or gaming sites.

Monitoring, however, is much more. It goes deeper than filtering and it tells the journey of what users have been doing. The MAT currently uses Senso for its monitoring solution which includes taking screenshots, monitoring/blocking via categorised lists, logging all application/web access and sending alerts to the safeguarding team. It might tell you what happened before or after something happened and it's not just about the internet it can cover all apps across different devices.

Both filtering and monitoring are important tools for protecting students/pupils online. However, they are not mutually exclusive. Schools should use a combination of filtering and monitoring to create a comprehensive online safety strategy.

The MAT has two systems in place for web filtering, **School Protect Web Screen and Senso Content Filtering**.

London Grid for Learning School Protect Web Screen

London Grid for Learning (LGFL) is the Internet Service Provider for the MAT and implements Webscreen as its web filtering service. Webscreen is powered by the Netsweeper engine, which constantly scans the internet to identify harmful content on both new and old websites. Webscreen is located at the gateway of the MAT network, safeguarding the internet for all on-premise devices that are connected via cable or WiFi.

Senso Content Filtering

Senso operates through the cloud and is deployed on all endpoints (MAT Desktops, Laptops/Chromebooks). With this advanced technology, it provides filtering for all MAT devices, regardless of whether they are on or off the MAT network.

13. Complaints and Concerns About School Safeguarding Policies

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

Other complaints

Explain how your school handles safeguarding-related complaints of other types here – for example, those related to students/pupils or premises.

Early years providers should take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.75).

Whistle-blowing

If you have a separate whistle-blowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures – refer to it here.

Alternatively, explain your procedures for raising concerns about the school's safeguarding practice here. You should consider:

- What areas of malpractice or wrongdoing are covered by the procedures
- The options available for reporting a concern, including who to approach within the school and externally
- How the school will respond to such concerns
- What protection is available to staff who report another member of staff

Early years providers should also note the requirements set out in paragraph 3.76 of the statutory framework for the Early Years Foundation Stage; you may wish to cover these here if not already covered in a separate policy.

14. Monitoring & Review

All school staff (including temporary staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/carers on the school website.

This policy has been written to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare. The policy forms part of our school development plan and will be reviewed annually.

The Safeguarding Team will review the policy following any updates to legislation, or any child protection concerns (including any learnings identified from serious case reviews), or allegations against staff to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.

The policy will be monitored and reviewed by the MAT Safeguarding team and the Director responsible for safeguarding and approved by the Board of Directors.

Updated	Next Review	Reviewed by	GB/Committee Ratification
Sept. 2021	Sept. 2022	Safeguarding Team	Bd of Directors 18.09.21
Sept. 2022	Sept. 2023	Safeguarding Team	Bd of Directors 01.09.22
Sept. 2023	Sept. 2024	Safeguarding Team	Bd of Directors 23.09.23

APPENDIX ITEMS

Appendix 1 DfE guidance Keeping Children Safe in Education 2022

Appendix 2 Safeguarding Team Contact Details

Appendix 3 MAT Safeguarding Team Poster

Appendix 4 Procedure: Responding to Disclosures

Appendix 5 Safeguarding/Welfare Concern Form

Appendix 6 Types & Indicators of Abuse

Appendix 7 Annex B Specific Areas of Safeguarding

Appendix 8 Allegations of Abuse made against Staff

Appendix 9 Safer Recruitment

Appendix 1: DfE Guidance Keeping Children Safe in Education 2023 – Part 1

New guidance was released by the government in September 2023. It is essential for all staff to read Part 1 of this document (information for all school and college staff), including Annex B. Annex B has been updated and contains important additional information about specific forms of abuse and safeguarding issues.

PART 1: Safeguarding information for all staff - P6

ANNEX A: Safeguarding information for school and college staff - P136

ANNEX B: Further Information - P141

The document will be shared during training sessions and can also be found on our MAT Staff Bulletin.

Keeping Children Safe in Education - 1 September 2023 - [CLICK HERE.](#)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf

Appendix 2: Safeguarding Team Contact Details

Designated Safeguarding Lead	Thomas Perryman	tom.perryman@gnsa.co.uk
Designated Safeguarding Lead	Alexandra O'Leary	alexandra.oleary@gnsa.co.uk
Designated Safeguarding Lead	Anushka Chatur	anushka.chatur@nanaksarprimary.co.uk
Deputy Safeguarding Lead	Kulwinder Grewal	kulwinder.grewal@gnsa.co.uk
Deputy Safeguarding Lead	Jatinder Dhillon	jay.dhillon@gnsa.co.uk
SENCO	Hannah Lowder	hannah.lowder@gnsa.co.uk
Director for Safeguarding	Peter Ryerson	peter.ryerson@gnsa.co.uk
Chief Executive Officer (CEO) / Executive Principal	Jaskamal Singh Sidhu	jaskamal.sidhu@gnsa.co.uk
Chair of Board of Directors	Arun Thakur	arun.thakur@gnsa.co.uk

All staff can be contacted by telephone through the school office on 020 8573 6085.



Safeguarding Team

**At Guru Nanak Sikh Multi Academy Trust,
all staff take safeguarding our students
VERY seriously!**

If you do not feel safe, then you can talk to any member of staff who will help you and if they cannot, they will know someone who can.

Worried about something?

Need someone to talk to?

Need help?



Students

Meet the GNSA MAT Safeguarding Team, who are specially trained to deal with issues where your safety and wellbeing are concerned.

Executive Principal:



Mr Sidhu

Designated Safeguarding Leads (DSL)



Mr Perryman



Miss O'Leary



Miss Chatur

Deputy Designated Safeguarding Lead (DDSL)



Mr Dhillon





Mrs Grewal

SENCO



Miss Lowder

Appendix 4: Procedure: Responding to Disclosures

<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: center;"> GNS Multi Academy Trust 5 Principles to Manage Disclosures </div>  </div>		
1	RECEIVE	Take a breath & stay calm. Try not to look shocked or disbelieving. Do not be judgemental – take what the young person is saying seriously and believe them. It might be unexpected and you might be worried how to respond – but be confident in yourself. Remember the young person has trusted you by sharing this information.
2	REASSURE	Reassure the young person they have done the right thing by telling you. Acknowledge how hard it must have been to speak out. Tell them they are not to blame. Empathise but do not tell them how they should be feeling. (Remember the more supported a young person feels when they open up to someone the more likely they are to do it again).
3	RESPOND	The main thing is to listen. However, you may need to ask for a little bit more information to make sure you have understood what the young person is telling you. Keep this minimal - do not interrogate - avoid leading questions. Explain what will happen next and that you will need to share this information with the DSL to make sure the young person is okay. Let them know you will update them on anything that is going to happen. It is important never to promise a young person you will keep something a secret.
4	REFER	Refer your concerns to the DSL. <u>DO NOT DELAY</u> . Should this be inappropriate for whatever reason, you should not hold back from reporting, but do so to an alternative Designated Officer or to the Directors. If there is an allegation against a member of staff then this must be reported to the CEO.
5	RECORD	Put in writing what the pupil has told you as soon as possible by using 'SafeguardMySchool' via ClassCharts or a Safeguarding & Welfare concern form (from the office). Record as clearly as possible what happened. Use the language used by the young person wherever you can – what exactly did they say? It should also, if felt appropriate, include factual observations about the observable physical and emotional state of the young person.

Raising a Safeguarding Concern at GNSA MAT

Safeguarding Team

Tom Perryman (DSL)
Alex O'Leary (DSL)
Anushka Chatur (DSL)
Jaskamal Sidhu
Kully Grewal
Jay Dhillon

Link Director

Peter Ryerson

RECEIVE

When you receive a disclosure stay calm, take it seriously & remember the student has trusted you by sharing this information.

Local Authority

Hannah Ives
Local Authority Designated Officer

Nicole Diamond
Child Protection Adviser to Schools and Deputy LADO

Stronger Families Hub:
01895 556006

REASSURE

Reassure the student they have done the right thing by telling you.

The Safeguarding Team will review the concern and take necessary action as appropriate. Next steps include:

- Monitoring the student
- Sharing the concern with parents
- Making a referral to social care

All disclosures are responded to on a case by case basis.

If the child is in immediate danger, call 999.

RESPOND

Listen and ascertain the facts. Avoid any leading questions. Explain what will happen next and that you will need to share this information with the DSL to make sure they are safe.

Never promise you will keep something a secret.

If you have a concern about a member of staff, speak to the Executive Principal.

Jaskamal Sidhu

If you have a concern about the Executive Principal, speak to the Chair of Directors.

Arun Thakur

See the school office for contact details.

All concerns are treated seriously. Your welfare is also important.

REFER

Do not delay.

Contact the school office to locate a member of the safeguarding team.

RECORD

Put in writing what the student has told you as soon as possible by using 'SafeguardMySchool' via ClassCharts or a Safeguarding concern form.

Record the facts as clearly as possible. Share the language used by the student wherever you can.



Safeguarding is EVERYONE'S responsibility

At GNSA Multi-Academy Trust we are committed to safeguarding and expect everyone who works in our school to share this commitment.

Responding to Sexual Abuse at GNSA MAT

Definitions

Sexual Violence

Rape

Assault by penetration

Sexual Assault

Causing someone to engage in sexual activity without consent

Sexual Harassment

Unwanted conduct of a sexual nature including sexual comments, sexual taunts, physical behaviour or online sexual harassment.

RECEIVE

If you receive a disclosure of sexual abuse from a student, follow the MAT procedures: **Receive - Reassure - Respond - Refer - Record**

REASSURE & RESPOND (Victim)

- Listen carefully
- Tell the student they are being taken seriously
- Do not promise confidentiality
- Have two staff members present where possible
- Where online, do not to view or forward illegal images of a child
- Tell the student what the next steps will be and who the report will be passed to

If the victim does not give consent to share information, staff may still lawfully share it, to protect the student from harm and to promote their welfare.

REFER & RECORD

Contact a member of the safeguarding team and record the disclosure using 'SafeguardMySchool' or a Safeguarding concern form.

CONSIDERATIONS

Wishes of the victim - Nature of the alleged incident - Ages of the students - Development stage of the student - Any power imbalance - Patterns of behaviour - Any ongoing risks - Other related issues & wider contexts

Manage Internally

In some cases (one-off incidents) the student may not be in need of early help or require referrals to be made to statutory services. The case would be handled internally (using behaviour and bullying policies and pastoral support).

Early Help

Support will be provided as soon as a concern emerges which may prevent the escalation of sexual violence. The case could be managed internally and also seek early help for both the victim and perpetrator(s).

Refer to Social Care

Where a student has been harmed (is at risk of harm), a referral is made to social care. Parents are informed unless there are compelling reasons not to. Social care will make enquiries to determine whether any of the students involved are in need of protection or other services.

Refer to Police

Any report to the police will generally be in parallel with a referral to social care. Where a report of rape, assault by penetration or sexual assault is made, this is passed on to the police.

Support for Victim

- Early Help & Social Care Support
- Child and adolescent mental health services (CAMHS)
- Specialist therapeutic support
- External Psychotherapist (Counsellor)
- Drama & Play Therapist

Support is provided on a case by case basis.



Support for Perpetrator

Alongside disciplinary sanctions:
 -Use of pastoral support team to work with perpetrator on boundaries/consent including mentorship
 -Referral to the school's external Psychotherapist and/or Drama & Play Therapist
 Any alleged perpetrator is entitled to a high level of support to help them understand and overcome the reasons for their behaviour.

At GNSA Multi-Academy Trust there is ZERO TOLERANCE to any form of sexual violence or sexual harassment.

Appendix 5: Safeguarding/Welfare Concern Form



Guru Nanak Multi Academy Trust

Safeguarding & Welfare Concern Form 2023/24

IF THE SITUATION IS URGENT YOU SHOULD TAKE ACTION IMMEDIATELY AND COMPLETE THIS FORM AFTERWARDS

Completed by:

DATE: TIME:

pupil Name: Yr:

☐

GNSA Primary

☐

GNSA Secondary

☐

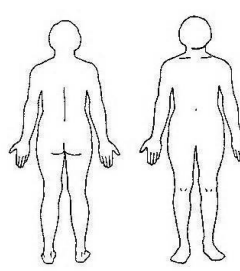
Nanaksar

Reason for concern:

.....
.....
.....
.....
.....
.....
.....
.....

Signed:

Please mark as required



To be filled in by a member of the MAT Safeguarding Team:

Action:

.....
.....
.....
.....
.....
.....
.....
.....

Outcome:

.....
.....
.....
.....
.....
.....

Parents informed:

☐

Yes

☐

No

Safeguarding Team Member

Name:

Signature:

Date:

Appendix 6: Types & Indicators of Abuse

The below information is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education 2023](#) (p10).

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

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

Appendix 7: Annex B Specific Areas of Safeguarding

In addition to the four categories of abuse, Annex B of the updated Keeping Children Safe in Education guidance 2023, contains important additional information about specific forms of abuse and safeguarding.

Please click on the link below (p141) for further information on each of the areas listed below.

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Table of Contents

Child abduction and community safety incidents	142
Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)	142
County lines	143
Children and the court system	144
Children absent / missing from education	144
Children with family members in prison	145
Cybercrime	145
Domestic abuse	146
Homelessness	148
Mental health	148
Modern Slavery and the National Referral Mechanism	149
Preventing radicalisation	149
The Prevent duty	150
Channel	151
Sexual violence and sexual harassment between children in schools and colleges	152
Serious Violence	152
So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)	154
FGM	154
FGM mandatory reporting duty for teachers	154
Forced marriage	155
Additional advice and support	156

- A - Children Absent from Education**
- B - Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**
- C - Domestic Abuse & Operation Encompass**
- D - Homelessness**
- E - Female Genital Mutilation (FGM)**
- F - Forced Marriage**
- G - Preventing Radicalisation**

A: Children Absent from Education

All staff should be aware that students/pupils being absent from school or college, particularly repeatedly and/or for prolonged periods, and those missing education can act as a vital warning sign of a range of safeguarding possibilities.

This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of 145 substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

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

B: Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education. Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

C: Domestic Abuse & Operation Encompass

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour.

Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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. Experiencing domestic abuse 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

The MAT are part of Operation Encompass which operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

D: Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

The DSL and Deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

E: Female Genital Mutilation (FGM)

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

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

F: Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

G: Preventing Radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour. The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others

- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong. Staff should **always** take action if they are worried.

Appendix 8: Allegations of Abuse made against Staff

Allegations that may meet the harms threshold

This section is based on Part 4 of Keeping Children Safe in Education (p87) and applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the CEO, or the Chair of Directors where the CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

The school will follow safeguarding procedures and inform the LADO if there's an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the MAT.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Board of Directors will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific Actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language.

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system.

Responding to low-level concerns

If the concern is raised via a third party, the CEO will collect evidence where necessary by speaking:

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

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

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school.

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

References

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

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

Appendix 9: Safer Recruitment

Recruitment and selection process

The recruitment steps outlined below are based on Part 3 of Keeping Children Safe in Education. To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true.

Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process.

Seeking references and checking employment history

We will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made.

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
 - For all staff, including teaching positions: criminal records checks for overseas applicants

- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Directors

All Directors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board will have their DBS check countersigned by the secretary of state. All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK.

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID;
or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students/pupils or staff.