Child Protection & Safeguarding Policy

(including allegations against staff and low-level concerns)

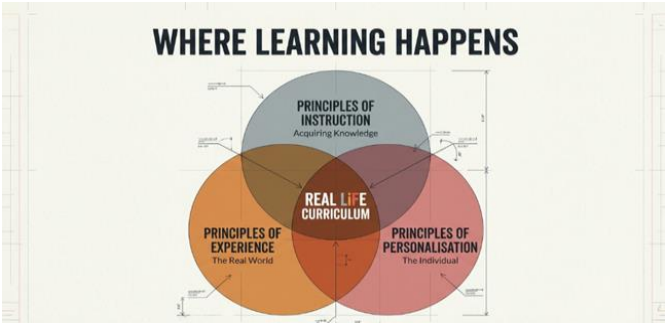
CURRENT POLICY REDRAFT/AMENDMENTS	**No**	***If YES please provide brief details of changes below and highlight changes .***	
NEW POLICY	**No**	**AUTHOR**	Lara Hall
LAST REVIEWED	August 2026	**NEXT REVIEW**	31st August 2027
REVIEW CYCLE	**Annually**	**TO BE RATIFIED BY TRUSTEES**	**Yes**
		TO BE RATIFIED BY THE LGB	**No, LGB to note.**
DATE APPROVED BY TRUSTEES	**14th August 2026**		
LiFE MAT school adopting this policy:	**Countesthorpe Academy**		

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LIFE MAT APPROACH

At LiFE MAT, our policies are anchored in our vision where every learner is empowered to thrive and develop agency through a steadfast commitment to equity. Our approach is operationalised through our Real LiFE Curriculum, which integrates the Principles of Instruction, Experience, and Personalisation to cultivate the diverse strengths and passions of each learner.



This policy sets out the child protection and safeguarding policy and procedures for LiFE Multi-Academy Trust.

Sections 7, 10, 15 and appendix 3 set out the specific arrangements for Countesthorpe Academy.

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Anita Howell	ahowell@clcc.college 0116 2771555
Deputy DSLs	Alexa Hunt Amanda McKenzie Gareth Williams Catherine Aitcheson Nathan Williams Kerry Challinor Gill Burley Vicky Woodcock Rebecca Wakefield Samanth Weston Cheddie Gore	ahunt@clcc.college 0116 2771555 amckenzie@clcc.college 0116 2771555 DSL@clcc.college

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Local authority designated officer (LADO)	Leicestershire County Council Local Authority Designated Officer (LADO) **Allegations Line:** 0116 305 4141 LADO email for Referrals and New Enquiries: CFS-LADO@leics.gov.uk Please note that the LADO service is available office hours only: Monday-Thursday, 8.30am-5.00 pm and Friday, 8.30am-4.30pm Outside of office hours, please contact the Leicestershire First Response Children's Duty Team. Tel: 0116 305 0005 Leicester City Council Local Authority Designated Officer (LADO) Local Authority Designated Officer (based within the Safeguarding Unit) Telephone Number: 0116 454 2440 Email: Lado-allegations-referrals@leicester.gov.uk	
Chair of governors	Andrew Berrill Abigail Stewart	aberrill@clcc.college astewart@clcc.college
Safeguarding Trustee	JOHN BAUMBER	governanceprofessionals@lifemulitacademytrust.org.uk
Chair of Trust Board	DAVID MAITLAND	governanceprofessionals@lifemulitacademytrust.org.uk
Channel helpline	020 7340 7264	

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2023), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners. This policy should be read alongside any additional statutory guidance published by the Department for

Education during the academic year and should be interpreted in line with current safeguarding legislation and local safeguarding partnership procedures.

This policy is also based on the following legislation:

- 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

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge, including through universal services, community-based early help and the targeted early help level of Family Help
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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.

Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into an activity that benefits another person. Exploitation may be sexual, criminal, financial or otherwise and may include trafficking or modern slavery.

Family Help describes support provided to children and families according to their assessed level of need. This includes universal services and community-based early help, targeted early help and statutory services where required.

Safeguarding separation is a protective arrangement used to minimise contact between children where an assessed safeguarding risk makes this necessary. It is not a disciplinary sanction. Any safeguarding separation arrangement must be proportionate, clearly recorded, regularly reviewed and accompanied by appropriate support for all children involved.

Making or sharing nudes and semi-nudes refers to the creation, sending or posting of nude or semi-nude images by children under the age of 18. Images include photographs, videos, livestreams and other visual content. They may be taken by the child themselves, taken or created by another person, digitally altered, or wholly generated using artificial intelligence, including deepfakes or deep nudes.

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 sensitive to the terminology used and, where appropriate, use language with which the child feels most comfortable, such as "the child who has been harmed".

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. Where appropriate, the terms "child alleged to have caused harm" or "child who has caused harm" may be used.

4. 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 children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers or have other significant caring responsibilities that may affect their attendance, attainment, behaviour or wellbeing
- May experience discrimination, harassment, bullying or abuse because of their race, ethnicity, religion or belief, sex, disability, sexual orientation, gender reassignment, perceived identity or another personal characteristic
- Have English as an additional language
- Are living in circumstances that may present additional challenges, including temporary accommodation, homelessness, substance misuse, adult mental-health difficulties, domestic abuse or parental conflict
- Are at risk of female genital mutilation, forced marriage, so-called honour-based abuse, radicalisation, trafficking, modern slavery, or sexual, criminal or financial exploitation
- 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 (see section 12)
- Are pregnant and/or are parents themselves
- Have a parent or carer in custody or are otherwise affected by parental offending
- Have exhibited early signs of abusive, violent or harmful behaviour
- Have experienced repeated removal from lessons, multiple suspensions, a part-time timetable, permanent exclusion or placement in alternative provision
- Are at risk of serious violence, knife crime, gang involvement or association with organised crime groups
- Have medical conditions that may increase their dependency on adults or create additional barriers to recognising or reporting abuse
- Are frequently missing from education, home or care; are persistently or severely absent; or are absent from education on repeated occasions or for prolonged periods
- Whose parent/carer has expressed an intention to remove them from school to be home educated

Each school will consider whether its pupil profile, local community, contextual safeguarding information or patterns in safeguarding data indicate any additional vulnerabilities. Relevant local risks and safeguarding arrangements should be described within Appendix 3.

5. Roles and responsibilities

Safeguarding and child protection are everyone's responsibility. This policy applies to all staff, supply staff, trainee teachers, contractors, volunteers, local governors and trustees across the Trust and is consistent with the procedures agreed by the three safeguarding partners. The policy and its procedures also apply to extended-school provision, off-site activities, alternative provision and activities delivered by external organisations using school premises.

Safeguarding is supported through an inclusive school culture in which children experience positive relationships, regular attendance, a sense of belonging and access to timely support. Attendance, behaviour, SEND, pastoral and safeguarding information will be considered together where this may help staff to identify vulnerability, understand risk and provide appropriate support.

The Trust and its schools play a crucial role in preventative education. This forms part of a whole-Trust approach to preparing pupils for life in modern Britain and creating a culture in which racism, sexism,

misogyny, misandry, homophobia, biphobia, transphobia, discriminatory behaviour, harassment, violence and abuse are challenged and never normalised. This will be underpinned by the school's:

- 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 FGM and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Read and understand the LiFE MAT Staff Code of Conduct, and review this at least annually

All staff will be aware of:

- Their responsibility to reinforce the importance of online safety when communicating with parents and carers. 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)
- Their responsibility to provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead DSL and deputy DSLs, the behaviour policy, and the safeguarding response to children who go missing from education
- The local process for providing early support to children and families, including universal services, community-based early help and targeted support through Family Help (or the relevant local family support arrangements), and their role in this process, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification, assessment and appropriate intervention.
- 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 child 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, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), 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) modern slavery, trafficking and financial exploitation.

- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of maintaining professional curiosity, respectfully challenging where appropriate and never assuming that another person has taken action where there are safeguarding concerns.
- 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 (LGBTQ+) can be targeted by other children
- That concerns relating to attendance, behaviour, wellbeing, repeated removal from lessons or changes in presentation may indicate that a child requires additional safeguarding support.
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection
- The importance of recording concerns, discussions, decisions and the rationale for those decisions in accordance with the school's safeguarding recording procedures.

Section 15 and appendix 3 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The DSL at Countesthorpe Academy is Anita Howel. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, understanding the filtering and monitoring processes in place on school devices and networks, and working with school leaders and IT providers to ensure these arrangements remain effective in protecting children online.

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

Appropriate cover arrangements will ensure timely access to safeguarding advice, safeguarding records and decision-making whenever the DSL is unavailable.

If the DSL and deputies are not available, the Headteacher will arrange for another appropriate member of staff from across the trust to act as cover.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Lead or contribute to assessments of need through Family Help, children's social care and other multi-agency safeguarding processes, as appropriate.
- 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
- Understand emerging safeguarding risks, including those associated with artificial intelligence, deepfake technology, financial exploitation, trafficking and modern slavery.
- Have a good understanding of the filtering and monitoring systems and processes in place at Countesthorpe Academy.
- Ensure that staff receive appropriate Prevent training and induction and that the school's Prevent arrangements are implemented effectively.

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss and review the local response to child-on-child abuse, including sexual violence and sexual harassment, with police, children's social care and other safeguarding partners to ensure school procedures remain effective and reflect local practice.
- 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
- Oversee any safeguarding separation arrangements implemented to reduce identified safeguarding risk, ensuring that arrangements are proportionate, clearly recorded, regularly reviewed and supported by appropriate pastoral, educational and safeguarding provision for all children involved.

The full responsibilities of the DSL are set out in their job description and in Annex C of Keeping Children Safe in Education.

5.3 The board of trustees

The board will:

- Facilitate a whole-trust 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 equivalent) lead to monitor the effectiveness of this policy in conjunction with the board of trustees. This is always a different person from the DSL.
- Ensure all staff, including supply staff, trainee teachers, volunteers and contractors, receive appropriate safeguarding and child protection training (including online safety) and that this is regularly updated in accordance with statutory guidance and local safeguarding arrangements.
- Ensure that the school has appropriate filtering and monitoring systems in place, and that their effectiveness is reviewed at least annually, following any significant safeguarding incident, or where changes to technology or risk make this necessary. 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. This includes using the DfE's 'plan technology for your school service' to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.
- 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-trust approach to safeguarding and related policies

- Ensure that safeguarding, attendance, behaviour, inclusion and SEND arrangements are considered collectively when exercising strategic oversight of safeguarding across the Trust.

- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

- Receive assurance that safeguarding separation arrangements, where implemented, are used proportionately, are subject to appropriate oversight and review, and form part of the Trust's wider safeguarding arrangements.

- The trust 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). Appendix 2 of this policy covers this procedure

- 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 CEO will act as the ‘case manager’ in the event that an allegation of abuse is made against a headteacher (see appendix 2).

- The chair of the board of trustees will act as the ‘case manager’ in the event that an allegation of abuse is made against the CEO where appropriate (see appendix 2).

5.4 Local governing bodies

The Local Governing Body will appoint a lead Governor(s) (i.e. a Named Governor(s)) with responsibility for oversight and assurance to the LGB as to the effectiveness of safeguarding in the school. This person will liaise with the school DSL on local safeguarding issues and report to the safeguarding trustee. The Named Governor should seek assurance that safeguarding arrangements are effective in practice, including the school's culture of safeguarding, staff training, record keeping, safer recruitment, attendance, online safety, and the effectiveness of safeguarding systems and processes.

Training and a description for this role will be provided.

They will also hold the headteacher to account for the implementation of the policy and seek assurance that statutory safeguarding duties are being fulfilled and that safeguarding practice remains effective.

The Named Governor will receive appropriate safeguarding training to enable them to fulfil this role effectively and should meet regularly with the Designated Safeguarding Lead to support oversight while maintaining appropriate strategic challenge and avoiding involvement in operational safeguarding decisions.

5.5 The headteacher

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

- Ensuring that staff (including temporary staff) trainee teachers, contractors and volunteers:

  - Are informed of our systems which support safeguarding, including this policy, as part of their induction

  - 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/carers when their child joins the school and via the school website and ensuring that parents/carers know how to raise safeguarding concerns or seek support where required.

- 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 appropriate safeguarding cover arrangements are in place whenever the DSL and Deputy DSLs are unavailable, including access to safeguarding advice, records and decision-making where required.

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 2)

- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

- Overseeing the implementation of safeguarding risk management arrangements, including safeguarding separation where appropriate, ensuring that such arrangements are proportionate, clearly recorded, regularly reviewed and implemented in the best interests of all children involved

- Ensuring the relevant staffing ratios are met, where applicable

- Making sure each child in the Early Years Foundation Stage is assigned a key person

- Overseeing the safe use of technology, mobile phones and cameras in the setting

- Ensuring that the school's filtering and monitoring arrangements are reviewed regularly and that any actions arising from those reviews are implemented promptly

5.6 Virtual school heads

Virtual school heads have a non-statutory responsibility to promote the educational achievement of children with a social worker and children in kinship care by providing strategic advice and information to schools, local authorities and other relevant partners. This includes promoting educational attendance, attainment, progress and positive educational outcomes.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

School leaders, including the DSL, should work proactively with the Virtual School Head, social workers and other relevant professionals to help identify barriers to education, improve attendance and wellbeing, and ensure that children receive the support they need to achieve positive educational outcomes.

6. Confidentiality

At LiFE Multi-Academy Trust, we have a policy and procedures in place to ensure the following:

- 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 children
- The Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and other applicable data protection legislation do not prevent, or limit, the sharing of information where this is necessary to safeguard and promote the welfare of children.
- Where staff need to share special category personal data for safeguarding purposes, they should do so in accordance with data protection legislation and the Trust's data protection policies. If it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- 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:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - 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
    - 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
- Wherever possible, children and their parents/carers should be informed about the sharing of information unless doing so would increase the risk of harm to the child or another person, prejudice the prevention or detection of crime, or otherwise place someone at risk.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Decisions about sharing information should be proportionate, necessary, lawful and recorded. Where appropriate, safeguarding records should include the information shared, the rationale for sharing (or not sharing) and the outcome of any discussion.
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 2

For LiFE Academy's Trust Data Protection policies and procedures please visit LiFE Multi-Academy Trust website.

7. Recognising abuse and taking action

All staff are expected to identify and recognise indicators of abuse, neglect and exploitation and to be alert to children who may benefit from universal services, community-based early help, targeted support through Family Help or statutory children's social care intervention. This includes, but is not limited to, a child who:

- Has a disability or medical condition that may create additional safeguarding vulnerabilities or barriers to recognising or reporting abuse
- Has special educational needs (whether or not they have a statutory education health and care plan)
- Is a young carer or has other significant caring responsibilities that may affect their attendance, attainment, behaviour or wellbeing
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of trafficking, modern slavery, or sexual, criminal or financial exploitation
- May be experiencing physical, sexual or emotional abuse, stalking or coercive and controlling behaviour within an intimate relationship
- May be experiencing child-to-parent or caregiver abuse within the family
- Is at risk of being radicalised or exploited
- Is accessing problematic, inappropriate or harmful online content; developing unsafe relationships online; or being exposed to harmful interaction through social media, online platforms or generative artificial intelligence
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is experiencing mental-health difficulties, including self-harm, signs of an eating disorder, suicidal ideation or suicide risk
- 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
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- Has experienced repeated removal from lessons, is receiving education through a part-time timetable, or is placed in alternative provision or a pupil referral unit

Staff, supply staff, trainee teachers, contractors, volunteers, trustees and local governors must follow the procedures set out below in the event of a safeguarding concern.

Safeguarding concerns are rarely standalone. Staff should recognise that children may experience multiple and overlapping needs, risks and forms of harm at the same time.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 7.2) as soon as possible if you make a referral directly.

- The Leicester, Leicestershire and Rutland Safeguarding Children Partnership procedures set out the local multi-agency processes, protocols and expectations for safeguarding children. The DSL is expected to be familiar with these procedures, particularly those relating to indicators of abuse, thresholds, referrals and escalation.
- It is important that all parties act swiftly and avoid delays.
- Any person may seek advice and guidance from the First Response Children's Duty Professionals Consultation Line, particularly if there is doubt about how to proceed. Any adult, whatever their role, can take action in their own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.
- A clear record must be made as soon as possible, including the date and time, what was seen, heard or disclosed, action taken, decisions made and the rationale for those decisions. Records must be stored securely and confidentially in accordance with the school's safeguarding recording arrangements.
- Where appropriate and safe, schools will work openly with parents/carers and relevant professionals to address concerns and secure support for the child. Parents/carers should normally be informed before a referral is made, unless doing so may place the child or another person at increased risk of harm, impede a police investigation, lead to the loss or destruction of evidence, or otherwise be contrary to the child's best interests. Where staff are uncertain, advice should be sought from the DSL or children's social care without delaying necessary action.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Make an accurate record as soon as possible, using the child's own words wherever possible. Record what was said, seen or heard, distinguishing clearly between fact, observation and professional opinion. Do not ask the child to write their own account or repeat the disclosure unnecessarily.
- Sign and date the write-up and pass it on to the DSL within 10 minutes. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

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, frightened or threatened, or face additional barriers because of their age, disability, communication needs, language, ethnicity, sex, sexual orientation, perceived identity or other vulnerability

None of these factors should prevent staff from maintaining professional curiosity, building trusted relationships and speaking to the DSL where they have concerns. Staff should not wait for a child to make a direct disclosure before taking action.

7.3 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 3 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 local authority 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 or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

7.4 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)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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 take advice from local authority children's social care. Schools can also seek advice from the Director of School Improvement for LiFE Multi-Academy Trust to advise on next steps.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early support and Family Help

Where a child and family would benefit from support, the DSL will consider the most appropriate response in accordance with local thresholds and assessment arrangements. This may include universal services, community-based early help or a referral for targeted support through Family Help.

The DSL will normally lead or coordinate the school's contribution, liaise with relevant agencies and ensure that the child and family receive support at the appropriate level. A member of school staff may act as the lead practitioner where this is agreed through the relevant local arrangements and is appropriate to their role and expertise.

The child's situation, progress and the effectiveness of support will be reviewed regularly. If needs increase, support is ineffective or concerns escalate, the school will consider referral to children's social care without delay. Decisions, actions and their rationale will be recorded.

Leicestershire County Council Early Help information:

https://resources.leicestershire.gov.uk/education-and-children/child-protection-and-safeguarding/early-help

Leicester City Council Early Help information:

https://www.leicester.gov.uk/health-and-social-care/support-for-children-and-young-people/early-help/

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 (see section 7.1), 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.

The DSL and any person who makes a referral must be familiar with and follow the current Leicester, Leicestershire and Rutland safeguarding partnership escalation and professional-disagreement procedures. Schools must insert or verify the current link before publishing their local version.

7.5 If you have concerns about extremism

If a child 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 (see 'Referral' above). 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 the police or Channel, Where a Channel or Prevent referral is being considered, relevant safeguarding information should be shared with the police and other appropriate partners in accordance with data protection legislation and the child's safeguarding needs.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and local governors 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

7.6 If you have a concern about mental health

Mental-health difficulties may, in some cases, develop into safeguarding concerns or indicate that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Concerns may include self-harm, signs of an eating disorder, suicidal ideation or suicide risk.

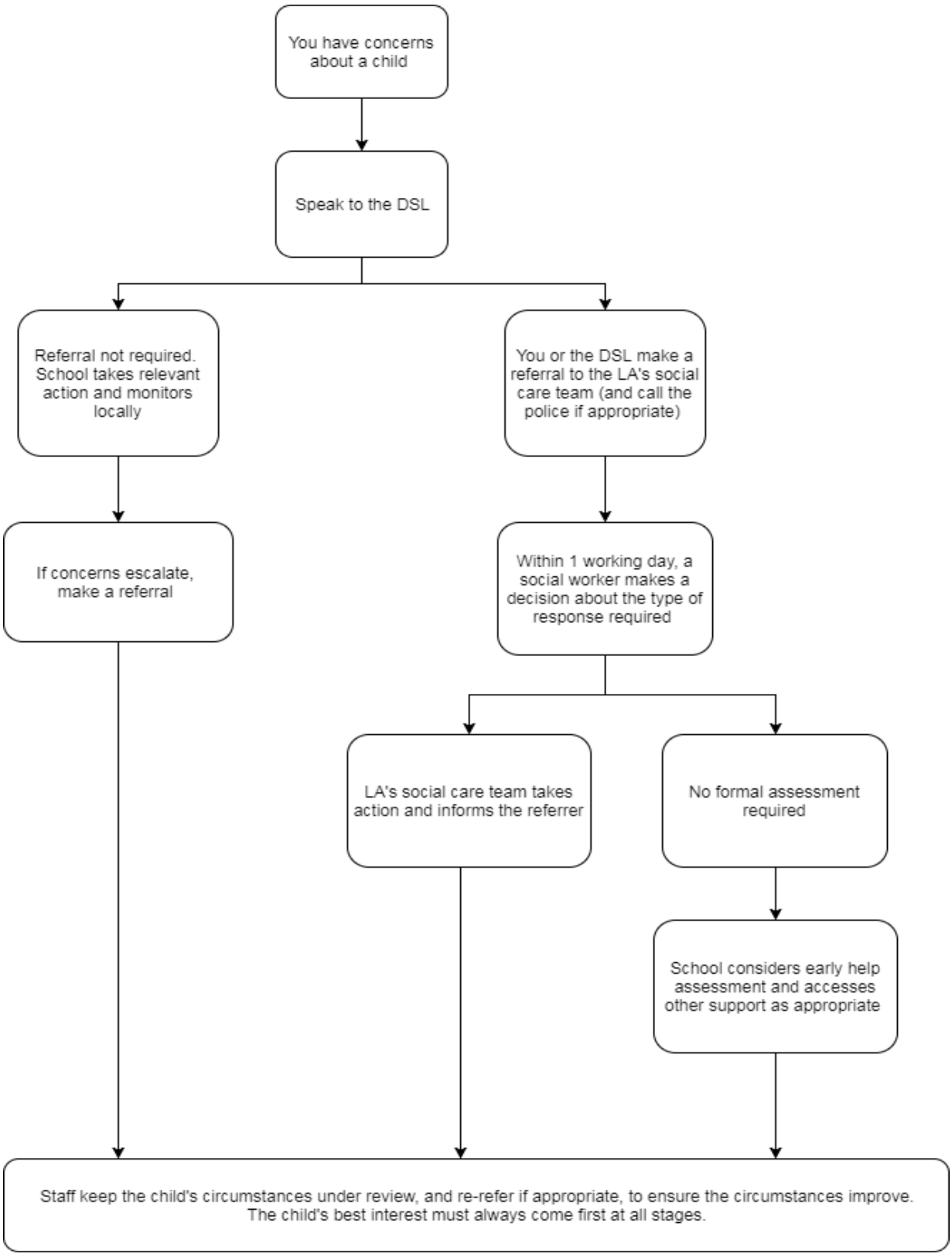
Staff will be alert to changes in behaviour, attendance, presentation, relationships, attainment or engagement that may indicate a mental-health or safeguarding concern. Staff should not assume that concerning behaviour is explained solely by mental health and should consider whether abuse, neglect, exploitation or other harm may be present.

Where a mental-health concern is also a safeguarding concern, staff must take immediate action in accordance with section 7.4.

Where the concern does not currently meet the safeguarding threshold, staff must still share it through the school's agreed pastoral or safeguarding arrangements so that appropriate support, monitoring and escalation can be considered. Schools are not expected to diagnose mental-health conditions; specialist advice and support should be sought where appropriate.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



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

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the CEO of LiFE Multi-Academy Trust.

The headteacher or CEO will then follow the procedures set out in appendix 2.

Where you believe there is a conflict of interest in reporting a concern or allegation to the headteacher, report it to the CEO of LiFE Multi-Academy Trust.

If a safeguarding concern or allegation relates to an individual or organisation using the school premises to provide activities or services for children, the school will follow its safeguarding procedures and consider referral to the LADO, as it would for any other safeguarding allegation. The school will work with the employing, placing or responsible organisation, but will not transfer or relinquish its own safeguarding responsibilities.

Where the individual is employed, supplied, placed or trained through another organisation, the school will liaise with that organisation and the LADO as appropriate. The school will remain actively involved in determining the facts, managing risk to children and agreeing the action required. The matter must not simply be referred back to the employing or training organisation for it to manage alone.

Where the concern relates to a trainee teacher, the school will involve the relevant training provider and employer, where applicable, while continuing to follow the school's safeguarding procedures and any advice provided by the LADO.

Concerns that do not meet the harm threshold must still be reported and managed in accordance with the Trust's low-level concerns procedures set out in Appendix 2. Staff must not determine for themselves that a concern is too minor to report.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 2 for more detail).

7.8 Child-on-child abuse, including harassment and violence

We recognise that children can abuse, harass or cause harm to other children. Child-on-child abuse is preventable and will never be tolerated, dismissed or passed off as "banter", "just having a laugh" or "part of growing up". Doing so can contribute to a culture in which harmful behaviour is normalised and children feel unable to report concerns.

Child-on-child abuse can occur between children of any age or sex, individually or in groups, inside or outside school and online. We recognise that some forms of abuse are gendered and that girls are more likely to experience sexual violence and sexual harassment, while boys may be less likely to report abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse is a safeguarding concern for every child involved. The child who has been harmed will require protection and support, while a child alleged to have caused harm may also have unmet safeguarding, welfare or support needs.

Some incidents between children may be managed under the school's Behaviour Policy. However, this policy will apply where behaviour indicates that a child has been harmed, is at risk of harm, or may have caused harm to another child. This includes behaviour that:

- Is serious, persistent, coercive or potentially criminal
- Has caused, or may cause, physical, sexual or emotional harm
- Involves violence, serious physical harm, threats of violence or the use or threatened use of a weapon
- Involves coercion, control, stalking, intimidation or an abuse of power
- Involves children being forced or manipulated into using drugs, alcohol, criminal activity or other harmful behaviour
- Involves sexual exploitation, sexual abuse, harmful sexual behaviour or sexual harassment, including

exposure, sexual assault, upskirting, coercing another child into sexual activity, or making or sharing nudes or semi-nudes
● Occurs online, including through social media, messaging, gaming, livestreaming, digitally altered content or AI-generated imagery
● Creates a risk to other children or contributes to an unsafe or harmful culture within the school

See appendix 3 for more information about child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence.

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

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

- Staff must make an accurate record and report the concern to the DSL without delay. Staff must not investigate, ask leading questions or require children to repeat their accounts unnecessarily.
- The DSL will undertake an initial safeguarding assessment and contact children's social care, the police or other relevant agencies where required. A potential criminal offence should be discussed with the police, taking account of the immediate safety and welfare of every child involved.

If the allegation involves a potential criminal offence

- The DSL will ensure that an individual safeguarding risk assessment and support plan are put in place for all children involved, including the child who has been harmed, the child alleged to have caused harm, witnesses and any other affected children. Each child will have a named trusted adult and appropriate pastoral, educational and safeguarding support. The assessment will consider risks arising in lessons, social times, movement around the site, school transport, educational visits, off-site provision and online or indirect contact.
- Where necessary to protect children or reduce an identified safeguarding risk, the Headteacher and DSL may implement safeguarding separation arrangements in accordance with the Trust's Safeguarding Separation Guidance. Safeguarding separation is a protective safeguarding measure and not a disciplinary sanction. It does not determine guilt or the outcome of any investigation.
- Any safeguarding separation arrangement will be based on an individual assessment of risk, be necessary and proportionate, clearly recorded and reviewed regularly. It will take account of the views, wishes, welfare, education and support needs of all children involved.
- Arrangements may include proportionate restrictions relating to social contact, lessons, movement around the site, unstructured time, transport, activities, online or indirect contact and, where risk cannot safely be managed on site, an off-site safeguarding direction in accordance with the Trust's procedures. Each arrangement must identify who is responsible for implementation, how education and support will continue, and the date on which it will be reviewed.
- Safeguarding separation must be reconsidered whenever circumstances or information change. It must not continue for longer than is necessary to manage the assessed risk.

The DSL will involve appropriate services, which may include Family Help, children's social care, the police, health or mental-health services and specialist harmful sexual behaviour services, according to the assessed needs of the children involved.

Where the matter may constitute a criminal offence, the school will work closely with the police and other agencies while continuing to protect and support the children involved. A police investigation or delay in criminal proceedings does not remove the school's responsibility to manage safeguarding risk. The school will seek police advice where proposed safeguarding or disciplinary action may affect an investigation or prosecution.

Creating a supportive environment in school and preventing child-on-child abuse

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.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be 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
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Recognise that harmful sexual behaviour may exist on a continuum and that early intervention in inappropriate, abusive or misogynistic behaviour can prevent escalation to sexual harassment or sexual violence
- Provide appropriate support to children who display harmful behaviour, recognising that they may have experienced abuse, trauma, exploitation or other unmet needs
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure 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
- Ensure staff are trained to understand:

  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child 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 child-on-child 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 Headteacher will determine any disciplinary response under the school's Behaviour Policy, working closely with the DSL to ensure that safeguarding remains the primary consideration. Safeguarding support and risk-management arrangements will continue alongside any disciplinary action. Safeguarding separation must not be recorded or presented as a disciplinary sanction.

- The school may take disciplinary action while police, children's social care or other investigations are ongoing, provided that doing so does not prejudice those processes. Decisions will be made case by case, following liaison with the relevant agencies where necessary.
- The school will consider:

● Whether the proposed action could prejudice an investigation or prosecution
● The need to protect and support all children involved
● Whether sufficient information is available for the school to reach a fair and reasonable decision under its own procedures
● The distinction between disciplinary action and safeguarding measures, including safeguarding separation
● Whether new information requires the risk assessment, support plans or safeguarding arrangements to be revised

7.9 Sharing of nudes and semi-nudes

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,), including digitally altered images and AI-generated images (sometimes referred to as pseudo-images) 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 local authority 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 local authority children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 3 for more information on assessing adult-involved incidents
- 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 SEN)
- 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 headteacher 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 local authority 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 local authority 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 through dialing 101 or using the online service using the appropriate police reporting route or by calling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our 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

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

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
- Pupils can report any concerns directly to any member of staff, via email to any member of staff, student can also email our care and guidance team on candg@clcc.college
- Pupils are made aware of this process throughout the year via assemblies, CREW/PREP time and during PSHCE sessions
- Pupils are reassured about the confidentiality of the process through assemblies, CREW/PREP time and during PSHCE sessions

8. Online safety and the use of mobile technology

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, the trust aims to:

- Have robust processes in place (including filtering and monitoring) to ensure the online safety of 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
- Adhere to DfE Cyber security standards for schools and colleges which were developed to help improve cyber resilience.

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, antisemitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **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 radicalization, and their 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 pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware of the expectations of acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- 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, 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 child 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

8.1 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.

LiFE Multi-Academy Trust recognises 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.

LiFE Multi-Academy Trust will treat any use of AI to access harmful content or bully pupils in line with this policy and each school's anti-bullying procedures.

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.

The Trust will also have regard to the Department for Education's 'Generative AI: product safety expectations' guidance to support the safe use of generative artificial intelligence and understand how filtering and monitoring requirements apply to its use in education.

9. Notifying parents or carers

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

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, 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 children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation 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 disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer extra pastoral support for these pupils. This includes:

- Working with ELSAs
- 1-1 support
- Small group work
- Review meetings
- A key worker

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11. 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. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support
- Working collaboratively with the social worker and other relevant professionals to improve attendance, engagement, safeguarding and educational outcomes

12. 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 local authority children's social workers and relevant virtual school heads

We have appointed a designated teacher, Mr Nathan
Williams (Assistant Headteacher/SENDCO), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to 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

13. Pupils who are lesbian, gay, bisexual or gender questioning

LiFE Multi Academy Trust recognises that pupils who are lesbian, gay, bisexual or gender questioning (LGBTQ+) may experience additional barriers to feeling safe, may be more vulnerable to bullying, discrimination or abuse, and may require additional pastoral or safeguarding support. The Trust will have regard to current statutory guidance and relevant Department for Education guidance when supporting gender questioning children.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. We will support children in line with our pastoral support arrangements.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as a complex mental health and psychosocial needs, and in some cases, autism (autistic children) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

14. Complaints and concerns about school safeguarding policies

14.1 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 (see appendix 2).

14.2 Other complaints

For all other complaints, including those related to the handling of safeguarding, for example related to pupils or premises, you can find our complaints procedures here:

https://www.lifemultiacademytrust.org.uk/governance/policies/

14.3 Whistle-blowing

LiFE Multi-Academy Trust has procedures in place for raising concern about safeguarding procedures across our trust.

You can find the link to this policy here:

https://www.lifemultiacademytrust.org.uk/governance/policies/

15. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

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

Concerns and referrals will be kept in a separate child protection file for each child.

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 promptly and 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.

In addition:

- Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15.1 Local record-keeping arrangements

Recording of concerns, meetings and disclosures are kept on CPOMS

When students transfer to Countesthorpe Academy, and a school sends across paper copies these are scanned and stored on CPOMS where appropriate and kept in a locked filing cabinet, until such time as the student leaves the school for another school.

- All schools in LiFE Multi-Academy Trust have an information sharing agreement with the Leicester, Leicestershire and Rutland Safeguarding Children Partnership which can be viewed at the link below:

https://lrsb.org.uk/information-sharing-agreement

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-trust 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
  - 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 becoming involved with or supporting 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 (for example, through emails, e-bulletins and staff meetings).

Trainee teachers will receive safeguarding and child protection training appropriate to their role and placement before working with pupils.

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.

16.2 The DSL and deputies

The DSL and deputies will undertake appropriate child protection and safeguarding training at least every two years and will access additional safeguarding training and professional development annually to keep their knowledge and skills up to date.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Trustees and local governors

All trustees and local governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

16.4 Recruitment – interview panels

At least one person conducting any interview for any post at the school 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. This will also cover guidance on verifying Qualified Teacher Status (QTS) and checking for prohibition orders using the DfE's 'Check a teacher's record' service on GOV.UK, and checking for Section 128 directions for management positions via the appropriate GOV.UK service.

More information on LiFE Multi-Academy Trust's recruitment procedures can be requested at hr@lifemultiacademytrust.org.uk

16.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring arrangements

This policy will be reviewed annually by the Director of School Improvement for LiFE Multi-Academy Trust. At every review, it will be approved by the board of trustees.

18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistle-Blowing

You can find a links to the LiFE Multi-Academy Trust policies at

https://www.lifemultiacademytrust.org.uk/governance/policies/

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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 participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: allegations of abuse made against staff

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer, contractor or trainee teacher 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 work collaboratively with the Local Authority Designated Officer (LADO), police and children's social care, as appropriate, ensuring that the welfare of children remains paramount throughout any investigation.

A ‘case manager’ will lead any investigation. This will be the headteacher or the CEO where the headteacher is the subject of the allegation.

The chair of the board of trustees will act as the ‘case manager’ in the event that an allegation of abuse is made against the CEO where appropriate (see appendix 2).

The case manager will be identified at the earliest opportunity.

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

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 trust

If in doubt, the case manager will seek views from the trust’s personnel adviser and the designated officer at the local authority, as well as the police and local authority 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 local authority 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 local authority children's social care services, where necessary). Where the police and/or local authority 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 local authority 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 local authority children's social care. In the event that the case manager is the CEO or the chair of the board of trustees, the Director of School Improvement will make this referral.

- **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 local authority 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. Further support will be offered to staff, including access to the employee assistance programme.

- 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 local authority 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

For early years provision: 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 trust 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 trust 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 individuals not directly employed by the Trust

If there are concerns or an allegation is made against someone not directly employed by the Trust, such as a **supply teacher, trainee teacher or contracted staff member**, 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 headteacher, or person deputising for the headteacher, will discuss with the **agency, employer or training provider, as appropriate**, whether it is appropriate to suspend the individual, or redeploy them to another part of the school/Trust, while the school carries out the investigation.
- We will involve the **agency, employer or training provider, as appropriate**, fully, but the school/Trust 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, employer or training provider** are taken into account, for example as part of the allegations management meeting or through direct liaison where necessary.

Where an individual is supplied or placed by an **agency or training provider**, we will inform them of our process for managing allegations, keep them updated about our policies as necessary, and invite an appropriate representative to meetings as required.

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 local authority 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 trust 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 trust 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 local authority 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 local authority 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 trust 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 local authority 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 file:

- 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 local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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 trust'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.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including **supply teachers, trainee 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
- Humiliating pupils

Sharing low-level concerns

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

All staff should feel empowered to self-report where they believe their own behaviour may have fallen below the expectations of the Staff Code of Conduct. Self-reporting will be viewed as a positive contribution to a culture of openness and safeguarding.

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 section 7.7 of 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 or trust's safeguarding system

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the staff code of conduct. The headteacher 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 harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

- Low-level concern records will be reviewed collectively, where appropriate, to identify patterns, recurring themes or organisational learning that may indicate emerging safeguarding risks.
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a **supply teacher, trainee teacher or contractor**, we will notify the individual's employer or training provider, as appropriate, so that 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

Following any substantiated allegation, the Trust will consider whether wider organisational learning, policy amendments, training or supervision arrangements are required to strengthen safeguarding practice.

Appendix 3: specific safeguarding issues

All staff at Countesthorpe Academy complete annual online safeguarding training and receive regular safeguarding updates/reminders from the DSL either through face-to-face training sessions, the school bulletin, further online training or in small groups.

In the event of a police investigation and/or a criminal investigation all documents pertaining to these investigations are stored on CPOMS but are limited in their access. Only the Headteacher and the DSL have access to such information. Other staff may have access to this information on a need-to-know basis with permission from the headteacher. In the event of the Headteacher or DSL being a party in an investigation, their access is removed and access is given to the Executive Headteacher.

Countesthorpe Academy has and continues to foster positive working relationships with Police, Social Care services and medical practitioners, but also with other support agencies such as those working with drugs, violence and mental health. All work with external agencies known to the school is recorded on CPOMS, this includes professional bodies coming into school to work with students.

Alternative Provision

Where LiFE Multi-Academy Trust places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision placements they make.

Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs.

Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on Annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from children and young people using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chat rooms or on gaming platforms and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Moved from a public to a private/E2EE platform
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them. Throughout 2022 and 2023, there has been a considerable increase in reporting of these incidents.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated, organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. Schools should also be alert to children who are persistently absent or severely absent, as this may indicate safeguarding concerns requiring further assessment.

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, in line with the Department for Education's statutory guidance on school attendance 'Working together to improve school attendance, to help identify the risk of abuse, exploitation 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.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late

- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Further information on preventing child sexual exploitation is available from The Children's Society.

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.

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 peers (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 (historically referred to 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 in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

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.

Domestic abuse

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

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

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day via email through an Operation Encompass.

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

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 local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is 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.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 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 fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**
  - Negate or destroy the fundamental rights and freedoms of others; or
  - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **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 becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll 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 from becoming involved with or supporting 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 radicalisation into terrorism. 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.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including:

- Behaviour Policy
- Anti-Bullying Policy
- Online Safety Policy
- PSHCE and RE Curriculum
- PREVENT training (every two years)

Sexual violence and sexual harassment between children in schools

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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Schools may implement safeguarding separation arrangements, where appropriate, following a report of sexual violence or sexual harassment. Such arrangements will be proportionate, reviewed regularly and based on an individual risk assessment.
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

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

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

The Lucy Faithfull Foundation's 'Shore Space' (shorespace.org.uk) offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance

- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

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 in via CHECKIE 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 pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Telephone those on ARBOR who have permission to collect the child.
- Keep the child in either the Reception Area or the Care and Guidance Area depending upon their age and level of vulnerability. Students in Reception will be under the passive supervision of those staff in Reception.
- Students in the Care and Guidance Area may be under the passive supervison of the staff in the area or 1-1 with a member of staff depending on their age and level of vulnerability.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Search the school for the student and speak to their friends to establish where they may be.
- Search CCTV footage to try to locate the student or to see if they have absconded from site.
- In the event of not being able to locate a student we will:

- Text or Telephone the first emergency contact on the list found in Arbor.
- In the case of LAC or extremely vulnerable pupils, we will also contact the Police
- Provide the student with a Risk Assessment for the future to ensure that this is not repeated.