



THINKING  
SCHOOLS  
ACADEMY TRUST

Thinking Schools Academy Trust  
***“Transforming Life Chances”***

Safeguarding and Child Protection  
Policy

Holcombe Grammar School

<b>This Policy was Adopted on</b>	<b>July 2020</b>
<b>This Policy will be reviewed by The Regional Governing Body on</b>	<b>July 2021</b>
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### **Keeping Children Safe in Education COVID-19:**

Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (COVID-19). The department has issued non-statutory interim guidance on [safeguarding schools, colleges and other providers](#) during the coronavirus outbreak. This guidance supports governing bodies, proprietors, senior leadership teams and designated safeguarding leads to continue to have appropriate regard to KCSIE and keep their children safe. It suggests where schools and colleges might consider safeguarding policy and process differently when compared to business as usual.

During this pandemic, we also have a COVID-19 safeguarding annex available to read on the schools website. This is in conjunction with Government guidance and should be read alongside of the Safeguarding and Child Protection policy

## Policy statement and principals

The Trust Board of Directors and the Regional Governing Bodies takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our Academy to identify, assess, and support those children who are suffering harm.

We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern.

All staff believe that our Academy should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

As part of the Thinking Schools Academy Trust, there is also a Head of Safeguarding, who has received DSL training and is able to provide support, advice and guidance as well as training, for all Academy staff.

In order to meet statutory requirements, the Academy will:

- Ensure this policy is available on the Academy website.
- Place an electronic copy of the policy in the staff area of the Academy computer system/VLE
- Make available paper copies on request
- Raise safeguarding awareness through the school newsletter, assemblies, TSAT weekly safeguarding bulletin, staff meetings and other communications
- Ensure support is offered to parents/carers where English is a second language to help them understand the content of the policy.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct. In addition, all staff are provided with the statutory guidance '[Keeping Children Safe in Education](#)', DfE (2020) and are required to read Part one if they work directly with children and Annex A

## Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the Medway Safeguarding Children Partnership (MSCP). [MSCP](#)

## Policy principles

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm ensuring their approach is child-centred.
- All staff are an important part of the wider safeguarding system for children [Working Together to Safeguard Children](#)
- Pupils and staff involved in child protection issues will receive appropriate support. The Academies responsibility to safeguard and promote the welfare of children is of paramount

importance

- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident, and know how to approach adults if they are in difficulties, and that they will be effectively listened to.
- Policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

### **Policy aims**

- To raise the awareness of all staff of the need to safeguard children and provide all staff with the necessary information to identify and report possible cases of abuse allowing them to meet their child protection responsibilities.
- To ensure consistent good practice emphasising the need for good levels of communication between all members of staff as well as a structured procedure which all members of the Academy will follow in cases of suspected abuse.
- To demonstrate the Academies commitment with regard to child protection to pupils, parents and other partners.
- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and able to approach adults if they need help knowing they will be listened too.
- The voice of the child is evident in case files and informs schools policy developments.

### **Terminology**

**Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the 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 and taking action to enable all children to have the best outcomes.

**Child protection** refers to the processes undertaken to protect children who are identified as suffering, or being at risk of suffering, significant harm.

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

**DSL** refers to the designated safeguarding lead at the school.

**Child** includes everyone under the age of 18.

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

**KCSIE** refers to the DFE statutory document Keeping Children Safe in Education.

**MSCP** refers to Medway Safeguarding Children Partnership

This Policy should be read alongside:

- statutory guidance [Working Together to Safeguard Children](#)
- departmental advice [What to do if you are Worried a Child is being Abused-Advice for Practitioners](#)
- departmental advice [Sexual Violence & Sexual Harassment between Children in Schools & Colleges](#)

## Safeguarding legislation and guidance

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; Section 157 of the Education Act 2002; The Education (Independent Schools Standards) (England) Regulations 2003 in line with government publications: “Working Together to Keep Children Safe” 2018, Statutory Guidance for Schools and Colleges “Keeping Children Safe in Education” September 2020, Revised Safeguarding Statutory Guidance 2 “Framework for the Assessment of Children in Need and their Families” 2000, “What to do if you are worried a Child is being abused” 2015, Mandatory Reporting of FGM – procedural information HM (2015), CHANNEL Duty guidance, HM Government (2015), Prevent Duty guidance, HM Government (2015). The guidance reflects “Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings” 2019, Medway Safeguarding Children Partnership (MSCP) Safeguarding Children Procedures.

Expert and professional organisations are supportive of schools in providing up-to-date guidance and practical support on specific safeguarding issues. For example information for schools can be found on the [TES](#) , [MindEd](#), Medway Safeguarding Children Partnership [MSCP](#) , and the [NSPCC](#) websites.

## Roles and responsibilities

The Governance Body/Head Teacher is accountable for ensuring the effectiveness of this policy and school compliance. The Governance/Director has a named champion within Safeguarding; this is [Linda Randall](#) (Governance Safeguarding Lead)

### The role of staff

All staff have a responsibility to provide a safe environment in which children can learn. The Teachers Standards sets out expectations that all teachers manage behaviour effectively to ensure a good and safe educational environment, and requires teachers to have a clear understanding of the needs of all pupils, including those with mental health needs. Any staff member who has a concern about a child’s welfare should report this using the referral process on the Safeguard Software system. Staff should be prepared to identify children who may benefit from Early Help. School staff are particularly important as they are in a position to identify concerns early, promoting children’s welfare and preventing concerns from escalating. The Teachers Standards 2012 states that they should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.

### The Designated Safeguarding Lead (DSL) For Children and Families

- Has the status and authority within the Academy to carry out the duties of the post, including committing resources and supporting and directing other staff.
- Is directly line managed by the Head Teacher/Principal.
- Is appropriately trained, with regular updates and compliant with statutory refreshers.
- Acts as a source of support and expertise to the school community.
- Has a working knowledge of MSCP procedures.
- Keeps detailed electronic records of all concerns using Safeguard Software system, ensuring that such records are stored securely and flagged on, but kept separate from, the pupil’s general file. Access to such records is strictly controlled. The recording and storing of information is kept in line with [the-data-protection-act](#)
- Refers cases of suspected abuse to children’s social care or police as appropriate
- Ensures that when a pupil leaves the school, their child protection file is passed to the new school (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained through use of the Trust Safeguarding File Transfer Form/Safeguard Software system. In addition, the DSL may consider it appropriate to share information with the new school in advance of the pupil leaving in order to help safeguard and promote the pupils welfare.

- Coordinates, attends and/or contributes to child protection conferences and plans.
- Develops effective links with relevant statutory and voluntary agencies including the MSCP
- Liaises with the TSAT Head of Safeguarding to ensure that the child protection policy and procedures are reviewed and updated annually.
- Makes the child protection policy available publicly, on the school's website or by other means.
- Works closely with the designated Looked After Child teacher ensuring they have the contact details of the child's social worker and virtual head teacher.
- Through liaison with the Attendance Improvement Coordinator, will ensure that the Social Worker, of any pupil with a child protection plan who is absent without explanation, is informed the same day.
- Promotes educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on children's attendance, engagement and achievement at school.
- Ensures completion of termly report for the Regional Governing Body and the annual Local Safeguarding Children's Partnership audit if required.
- Develop a culture of listening to children and taking account of their wishes and feelings.
- Ensures that the voice of the child is heard evidencing this and the response within the safeguarding file
- Designated Safeguarding Lead will share risks and resilience of pupil/student proportionately with staff members/volunteers on a "need to know and in the child's best interest" and this is recorded and monitored to ensure risks/progress of pupil/student is understood. The Designated Safeguarding Lead will clearly state reasons for sharing this information and that this is carried out in strict confidentiality, we follow [safeguarding-practitioners-information-sharing-advice](#)

### The deputy designated safeguarding lead(s)

Is/are trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above. Deputy DSL's may support with some aspects of safeguarding as directed by the DSL.

### The Board of Directors and Regional Governing Bodies

Governing bodies and proprietors have a strategic leadership responsibility for the Academy's safeguarding arrangements and must ensure that they comply with their duties under legislation. They ensure a whole school approach to safeguarding with all systems, processes and policies operating with the best interests of the child at their heart is in place and can be evidenced. The wishes and feelings of the child when there is a safeguarding concern should be taken into account when determining what action to take and what services to provide. Systems are in place to allow children to express their views and give feedback.

All members of the Board of Directors and the Regional Governing Bodies understand and fulfil their responsibilities, namely to ensure that:

- The Governance Body ensures the school is compliant with section 175 of the Education Act 2002. The Governance body returns their 175/157 report to MSCP. Any areas of concern in safeguarding are identified and action plan/risk assessment is developed annually.
- There is a Child Protection policy (within the Safeguarding Policy) together with a staff behaviour (code of conduct) policy.
- The behaviour policy is in place and includes measures to prevent bullying including cyber bullying.
- All staff are given the relevant sections of guidance to read "Keeping Children Safe in Education September 2020".

- The Academy operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training as well as identified members of TSAT Governors who have undertaken training in Safer Recruitment.
- The Academy has procedures for dealing with allegations of abuse against staff and volunteers and will make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- DSL and deputy DSL undergo refresher training at least every 2 years as well as multiagency training and any other relevant training required. All other staff have Safeguarding training updated on a regular basis.
- 'Mechanisms' are in place to assist staff to 'understand and discharge their role and responsibilities' as set out in Part one of KCSIE.
- All staff and volunteers are provided with child protection awareness information at induction including the name of the DSL so that they know who to go to if they have a concern.
- All members of staff, volunteers, and Governors know how to respond to a pupil who discloses abuse through delivery of whole school training.
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the Trust Child Protection and Safeguarding Policy, available on the Academy website.
- Where reasonably possible, the Academy will hold more than one emergency contact number for each pupil.
- The DSL works together with the Attendance Improvement Coordinator to ensure appropriate responses and working with relevant outside agencies are in place for children who go missing from education particularly on repeat occasions.
- Academy lettings policy will seek to ensure the suitability of adults working with children on Academy sites at any time.
- Community users organising activities for children are aware of the Academy Child protection guidelines and procedures.
- The Regional Governing Body considers how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or for maintained schools through sex and relationship education (SRE).
- That enhanced DBS checks are in place for Chairs of Regional Governing Bodies. The Chair of the Directors is counter signed by the Secretary of State.
- The name of the DSL and deputy DSL's for Safeguarding and Child Protection will be clearly advertised in the Academy, with a statement explaining the Academies role and monitoring cases of suspected abuse.
- The Designated Looked After Child Teacher is a qualified teacher and undertakes appropriate training to ensure the education and welfare of Looked After Children and previously Looked After Children is prioritised.
- The Academy will comply with the requirements of the Counter Terrorism and Security Act to have due regard for the need to prevent people being drawn into terrorism and will act in accordance with its "Prevent" duty. This will include promoting British Values and building resilience to radicalisation, all staff completing Prevent training in order they can identify the signs of children being radicalised, working together with social care and Police Prevent Engagement Officer and referring as appropriate, the young person to the Channel Panel under the Prevent strategy. [The Prevent Duty](#)

The Governance Body/Head Teacher is accountable for ensuring the effectiveness of this policy and school compliance. The Governance/Director has a named champion within Safeguarding; this is [Linda Randall](#) (Governance Safeguarding Lead)



## Supporting Children

Safeguarding is not just about protecting children from deliberate harm. It also includes such things as student safety, bullying, racist abuse and harassment, educational visits, intimate care, Children Missing Education and internet safety etc. The witnessing of abuse can have a damaging effect on those who are party to it, as well as the child subjected to the actual abuse, and in itself will have a significant impact on the health and emotional well-being of the child. Abuse can take place in any family, institution or community setting, by telephone or on the internet. Abuse can often be difficult to recognise as children may behave differently or seem unhappy for many reasons, as they move through the stages of childhood or their family circumstances change. However, it is important to know the indicators of abuse and to be alert to the need to consult further. We recognise that all adults at this Academy have a full and active part to play in protecting and safeguarding the children in our care, and that the pupil's welfare is our paramount concern. We aim to provide an environment in which pupils feel safe, secure, valued and respected; and where they feel confident and know how to approach responsible adults if they are in difficulties.

The Department for Education has produced advice 'What to do if you are worried a child is being abused 2015'. This contains advice to help practitioners identify child abuse and neglect and take appropriate action in response. [What to do if you're worried a child is being abused: advice for practitioners](#)

## Good practice guidelines

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary directly to police or children's social care

## Early Help

Without intervention, a family may break down or a child may be put a risk of neglect, emotional, physical or sexual harm. This also includes the risk of extremism. The Academies have no pre-prescribed criteria for supporting children and families. Each case is assessed according to needs and a bespoke programme put in place for that child and/or family. Early identification of needs and support required can prevent concerns escalating. Early help plans should have focused outcomes for children and families, and should be actively planned with them. Plans should deliver evidence-based interventions using single agency or common assessment frameworks, and clear thresholds for specific agency intervention e.g. Social care, housing, mental health services. We see how early help can transform a child in school, not just what they are able to achieve academically, but how their personal, social and emotional development can thrive with the right support. We are committed to early help because it is the right thing to do for our children to give them the best start in life.

## Children who may be particularly vulnerable

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and

reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- have a mental health need
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home possibly in private fostering
- persistently absent from education
- showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- affected by parental offending or has a family member in prison
- live transient lifestyles or living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of modern slavery, trafficking sexual or criminal exploitation
- do not have English as a first language
- at risk of honour based abuse such as female genital mutilation (FGM) or forced marriage
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

We recognise that a child who is abused or witnesses' violence may feel helpless and humiliated, may blame itself and find it difficult to develop and maintain a sense of self-worth.

We recognise that the Academy may provide the only stability in the lives of children who have been abused or who are at risk of harm.

## **Mental Health and Self Harm**

Mental Health problems can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have mental health concerns about a child, they must inform the DSL without delay.

Self-harm is defined by the National Institute of Clinical Excellence Guidelines (2004) as an "expression of personal distress, usually made in private, by an individual who hurts him or herself". Essentially, self-harm is any behaviour where the intent is to cause harm to oneself.

Where appropriate, the pupil should be encouraged to call his or her parents to talk about what has happened. The DSL should also talk to the parent/carer. In the event that a pupil is reluctant to contact his or her parents, staff must take responsibility and alert parents that their child may be at risk of harming him or herself in the future.

It is recommended that the Academy provide parents with both community and web-based resources for understanding and effectively addressing self-injury. Advice on seeking support through the GP should also be provided. Referrals for counselling and Mental Health support may be offered. When people talk about "self-harm," they are usually referring to behaviors like cutting. But cutting is not the only way people self-harm. Ways of self-harming can include:

- cutting yourself
- poisoning yourself

- over-eating or under-eating
- biting yourself
- picking or scratching at your skin
- burning your skin
- inserting objects into your body
- hitting yourself or walls
- overdosing
- exercising excessively
- pulling your hair
- getting into fights where you know you will get hurt.

All cases of self-harm will be treated with sensitivity, with acknowledgement of the pupil's feelings and the circumstances surrounding that of the individual and their intentions.

[mental health & behaviour in schools guidance](#)

## Looked After Children and previously Looked After Children

Many looked after children have suffered disrupted learning and may have missed extended periods of school. The gaps in their learning – and in many cases the emotional impact of their experiences – are likely to have become significant barriers to their progress.

A previously looked-after child is one who is no longer looked after because s/he is the subject of an adoption, special guardianship or child arrangements order which includes arrangements relating to with whom the child is to live, or when the child is to live with any person, or has been adopted from 'state care' outside England and Wales.

Section 20 of the 2008 Act places the following duties on governing bodies:

- to designate a member of staff (the designated teacher) as having the responsibility to promote the educational achievement of looked-after children, including those aged between 16 and 18 who are registered pupils at the school;
- to ensure that the designated teacher undertakes appropriate training (section 20(2)); and
- the governing body and the designated teacher must have regard to this guidance and any other relevant guidance issued by the Secretary of State. Section 20(3) of the 2008 Act gives the Secretary of State power's to make regulations setting out the qualifications and experience which the designated teacher should have.

**The role of the designated teacher within the school:** The designated teacher should have lead responsibility for helping school staff understand the things, which affect how, looked after children learn and achieve. It is a legal requirement that they are a fully qualified teacher.

The designated teacher should:

- be a qualified teacher
- promote a culture of high expectations and aspirations for how looked after children learn;
- make sure the young person has a voice in setting learning targets;
- be a source of advice for staff about differentiated teaching strategies appropriate for individual children and in making full use of Assessment for Learning;
- make sure that Looked After Children are prioritised in one-to-one tuition arrangements and that carers understand the importance of supporting learning at home;
- have lead responsibility for the development and implementation of the child's Personal Education Plan (PEP) within the school and rigorously tracking their attainment progress.

- review whether the school's policies are sensitive to their needs, e.g. in accessing out of school hours learning, respecting the children's wishes and feelings about their care status or generally meeting their needs as identified in their personal education plans (PEPs)
- ensure whether any looked-after and previously looked-after children are identified as gifted and talented and how those needs are being met;
- be aware of whether any looked-after or previously looked-after children face additional safeguarding challenges of which the school's designated safeguarding lead should be aware;
- review whether any looked-after and previously looked-after children have special educational needs (SEN) and whether those needs are being identified and met at the appropriate level;
- review whether any looked-after and previously looked-after children have mental health needs and whether those needs are being identified and met;
- whether the school's behaviour management policy is sufficiently flexible to respond to looked-after and previously looked-after children's challenging behaviour in the most effective way for those children
- work with Virtual School Heads to promote the education of looked-after and previously looked-after children
- ensure that particular account is taken of the child's needs when joining the school and of the importance of promoting an ethos of high expectations about what s/he can achieve;
- arrange transitions to the next phase of a child's education so they are supported effectively to avoid children losing ground – e.g. moving schools from primary to secondary school or because of a change in placement or exclusion;
- remind parents and guardians of previously looked-after children when enrolling at the school, that they need to inform the school if their child is eligible to attract PP+

Where they are used effectively, PEPs improve the educational experience of the child by helping everyone gain that clear and shared understanding about the teaching and learning provision necessary to meet the child's education needs and how that will be provided. For this reason, **the school and local authority (through strong links between the designated teacher and the local authority virtual school head) have a shared responsibility for making the PEP a living and useful document.** Local Authorities are appointing a virtual school head who is a senior local authority manager with lead responsibility in the authority for improving the educational achievement of looked after children by tracking and monitoring their progress as if they were in a single school.

As part of the arrangements for monitoring the effectiveness of the role, governing bodies should as a minimum, receive an annual report from the designated teacher. The report should enable the governing body to make overall judgements about the designated teacher role in the context of wider school planning.

[looked-after and previously looked-after children.pdf](#)

## Care Leavers

The Local Authority have on-going responsibilities to young people who cease to be looked after and become care leavers aged 16 or 17. A Personal Advisor should be appointed to develop a pathway plan with the young person describing how the care leaver will be supported to participate in education. The DSL therefore must ensure they have the details of the LA Personal Advisor and liaise with them as necessary.

## Pupils with SEND

Children with disabilities and SEN have an increased vulnerability to abusive situations and can face additional safeguarding challenges. These challenges can include assumptions that indicators of

possible abuse such as behaviour, mood or injury relate to the child's disability or medical condition and therefore there is no further exploration; because they may need intimate care and may have cognitive impairments that prevent an understanding of appropriate adult behaviour. A lack of effective communication skills to share concerns and a reliance on adults can also be important factors. Safeguarding children and young people with SEND requires understanding, foresight and reflection. Keeping children safe from harm in school relies on all staff being able to recognise the raised risk factors, identify young people with the greatest levels of risk and create focused action plans that sufficiently respond to their needs. Keeping open dialogue between staff and raising the importance of safeguarding across the Academies is essential.

There are identifiable groups of children who are at greater risk of harm. Understanding the risk factors behind child abuse enables us to target those children and families at greatest risk and ensure that monitoring processes are particularly robust for those pupils. An effective partnership between the SENCO, designated safeguarding officers and pastoral staff, should identify children and siblings with the highest risks on intake to the school and over subsequent terms. By linking the information on the school's SEND register; those with poor attendance, children who are looked-after or previously looked after, children with multiple exclusions and those who score highly on other risk factors, resources can be effectively focused.

The term "disabled" covers a wide range of impairments that have a different impact on the child, their needs and their experience of disabling barriers. Any one child's experience of their impairment will be unique to them. However, some issues will be common to the experience of children across a number of impairment groups including children with moderate, severe and profound and multiple learning disabilities; children with specific learning difficulties; children with physical or visual impairments; deaf children; children with an autistic spectrum condition; children with physical or mental health needs; children with speech, language and communication needs; and children with behavioural, emotional and social development needs.

[Code of practice 0-25](#) [Supporting pupils at school with medical conditions](#) See also TSAT supporting pupils at school with medical conditions policy available on the Academy website and Trust website.

## **Intimate Care**

All children have a right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting or removing wet/soiled clothing). A care plan should be drawn up and agreed with parents for all children who require intimate care on a regular basis. Children should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. When assistance is required, staff should ensure that another appropriate adult is in the vicinity and is aware of the task to be undertaken.

## **Photos, Videos and Internet**

Be clear about the purpose and what will happen to the photos when the lesson/activity is concluded. Ensure that a senior member of staff is aware and for what purpose. Avoid making images in one to one situations. DO NOT take, display or distribute images of children unless you have consent to do so, preferably in writing.

It is recommended that

- If a photo is used avoid naming the pupil
- If the pupil is named avoid using their photo
- Academies should establish whether the images will be retained for further use
- Images should be securely stored and used only by those authorised to do so

Under no circumstance should adults in school access inappropriate images. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating

such material is illegal and if proven will invariably lead to the individual being barred from work with children and young people.

## Children missing from education

*“Basic to safeguarding children is to ensure their attendance at school.”*

All children, regardless of their circumstances, are entitled to a full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. A child going missing from education is a potential indicator of abuse or neglect. Academy staff should follow the Academies procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage. The Attendance Improvement Coordinator and DSL work closely together alongside the LA Attendance Team and any other relevant professionals.

[Children missing education;](#)

## Contextual Safeguarding

All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which any incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare. Contextual Safeguarding helps focus on the fact that young people experience harm beyond their families and recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships

## Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures. Further advice/information is also available here [Bullying including cyberbullying;](#)

## Racist Incidents

Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. All Academies keep a record of racist incidents. [Hate](#)

## Managing Allegations against other pupils (peer on peer abuse)

All staff must be aware that children can abuse other children. This is most likely to include, but may not be limited to:

- Bullying (including cyber bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Sexual violence such as rape, assault by penetration and sexual assault
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which maybe stand alone or part of a broader pattern of abuse
- Upskirting, which typically involves taking a picture under a persons clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or harm

- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals such as abuse or humiliation used as a way of initiating a person into a group. This may include an online element.
- Abuse in intimate personal relationships

To be considered part of this process, at least one of the following will probably be involved:

- The allegation is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

In areas where gangs are prevalent, older students may attempt to recruit younger pupils using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

Peer on Peer abuse will be taken seriously and should never be tolerated or passed off as “banter” or “part of growing up”. Same-sex relationships Lesbian, Gay, Bisexual and Trans (LGBT) young people experience relationship abuse at similar rates as heterosexual young people and, for some, it can be an increased risk factor. LGBT young people can face additional barriers to identifying abuse and seeking help. They may be concerned about revealing their sexual orientation; fearful of homophobic reactions from family, friends and professionals and unaware of specialist support services.

Lessons and assemblies can be used as a way to help children understand, in an age-appropriate way, what abuse is and encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Outside organisations will come in to the Academy to deliver assemblies. The Academy will create a whole school ethos that makes it clear to children that if they have a problem, however big or small they can talk to a member of staff. Ways to do this can include:

- displaying posters signposting children to services that might be able to help them if they are worried, such as ChildLine.
- using 'Worry boxes' - which are either placed inside the classroom or around the building. If a child is feeling unsure about approaching an adult this can be a good way for them to share their worries.
- class activities may be a time where concerns are shared.

When an allegation is made by a pupil, against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern, the DSL should be informed. Peer on Peer abuse which raises safeguarding concerns will be recorded, and actioned appropriately. This may involve interventions and referrals to outside agencies and professionals. The gendered nature of peer on peer abuse means it is more likely that girls will be victims and boys perpetrators. All types of peer on peer abuse is unacceptable and will be taken seriously. [Gang and youth violence](#)

## **Child on child sexual violence and sexual harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment can also occur within intimate personal relationships between peers. It is never acceptable and will not be tolerated. [Relationship abuse](#);



When responding to reports of sexual violence or harassment, decisions will be made on a case by case basis, with the DSL taking the leading role, using their professional judgment and alongside other agencies such as social care and the Police. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. It is therefore important to explore safeguarding concerns for the perpetrator ensuring any action required is taken to safeguard that child as well.

All victims will be reassured and the report will be taken seriously. It is important to note children may not find it easy to tell staff verbally. They may show signs or act in ways they hope an adult will notice and react to. A victim should not be made to feel ashamed for making a report or their experience minimised, ensuring they feel supported and are dealt with respectfully.

Where the report includes an online element, a key consideration is for staff not to view or forward illegal images of a child.

Where the report is of sexual violence, the DSL will make an immediate risk and needs assessment considering:

- the victim, especially their protection and support
- the alleged perpetrator
- all the other children (and if appropriate, adult students and staff) at the Academy, especially any actions that are appropriate to protect them.

The risk assessment will be recorded and kept under review.

There is further guidance available at [Sexual violence and harassment between children in schools](#) as well as KCSIE 2020 part 5 Child on child sexual violence and sexual harassment.

## Upskirting

Typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is now a criminal offence.

## Sexting

Creating and sharing sexual photos and videos of under-18s is illegal. Sexting is also referred to as 'youth produced sexual imagery'. Sexting does **not** include the sharing of sexual photos and videos of under 18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the Police.

If staff become aware of an incident involving sexting it must be reported to the DSL immediately. Staff must never view, download or share imagery themselves or ask a child to share or download- this is illegal. Do not delete the imagery or ask the child to delete it. The DSL is responsible for asking information regarding the imagery and will share with the appropriate adults and professionals. Further information is available here [Sexting in schools and how to respond](#)

## Sexual exploitation of children

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The Academy includes the risks of sexual exploitation in the PSHE and SRE curriculum. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as victims. The child may initially resent what they



perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse. All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL. Further information is available here [Child sexual exploitation](#)

## Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator and/or (c) through violence or threats of violence. The victim may have been criminally exploited even if the activity appears consensual.

All staff will be aware of indicators, which may signal that pupils are at risk from or involved with serious violent crime. Increased absence from school, changes in friendships, relationships with older pupils, decline in performance, self harm, injuries, significant changes in well being, unexplained gifts and new possessions could all indicate involvement or association with criminal networks or gangs. It can also occur through the use of technology Home Office's [gangs-and-youth-violence](#) and [criminal exploitation of children and county-lines](#)

## County Lines

County lines is the term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK) using dedicated mobile phone lines or other form of 'deal line'. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging' where drugs are concealed internally to avoid detection.

Missing episodes from both home and school is one way of identifying potential involvement in county lines. Further information on the signs of a young person's involvement in county lines is available in guidance published by the [Home Office](#) [Child missing from home or care](#); [Drugs](#)

## Child Exploitation and E-Safety

Children and young people can be exploited and suffer bullying through their use of modern technology such as the internet, mobile phones and social networking sites. In order to minimise the risks to students and young people, the Academy will ensure that it has appropriate measures in place such as security filtering as well as an 'acceptable use policy' linked to the e-Safety policy. The Academies will ensure that staff are aware of how to avoid compromising 'the position of trust' either in or out of the school and are aware of the dangers associated with the internet and other mobile technology. The Academies e-Safety policy will clearly state that mobile phone or electronic communications with a student at the school is **not** acceptable other than for approved school business e.g. coursework, mentoring. Where it is suspected that a student is at risk from internet abuse or cyber bullying concerns will be reported to the appropriate agency.

All Staff should be aware that technology is a significant component in many safeguarding and well-being issues. Children are at risk online as well as in day to day life. In many cases abuse will take place concurrently via online channels and in daily life. Staff will undertake Online Safety training. The breadth of issues classified within online safety is considerable but can be categorised into three areas of risk:

- **Content** being exposed to illegal, inappropriate or harmful content; e.g.: pornography, racist, radical and extremist, self-harm, suicide
- **Contact** being subjected to harmful online interaction with other users; e.g.: peer to peer pressure, grooming, commercial advertising
- **Conduct** personal online behaviour that is likely to increase or causes harm; e.g.: making, sending and receiving explicit images, sharing others explicit images and online bullying

The Thinking Schools Academy trust will review on an annual basis the approach to online safety ensuring that any risk assessments undertaken reflect the risks children may face.

Annex D in KCSIE 2020 provides extra links for Online Safety.

## Trafficking of children

Children can be trafficked into the country from abroad or children resident in the UK can become victims of trafficking too and be moved within a town or between locations for the purposes of exploitation. Exploitation includes children being used for **sex work, domestic work, restaurant/sweatshop, drug dealing, shoplifting and benefit fraud**. Often children and young people do not know that they have been trafficked. They may not want to tell their story for fear of not being believed, not knowing they are victims of crimes or fear of getting into trouble. They may still be under the control of their traffickers/exploiters. Even though a child may have been trafficked for a purpose other than sexual exploitation, they become highly vulnerable to physical and sexual abuse once they have been trafficked. Sexual exploitation of children is most likely to occur in informal locations, such as private flats. The use of trafficking for exploitative labour is often hidden and can be difficult to identify without the support of local communities. Risk indicators can include children who have unexplained moves, have not been enrolled into school or attended a GP practice, are being cared for by adult/s who are not their parents, are not in possession of their own travel documents, children who go missing from home or care, or unaccompanied asylum seeking children. Further information can be found here [Trafficking and modern day slavery](#)

## Honour-Based Abused

‘Honour-based’ violence (HBA) encompasses crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse. A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. Children may be married at a very young age and well below the age of consent in England. School staff receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England. [Forced marriage](#)

## FGM

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain, distress, and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

Mandatory reporting came into force in October 2015. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police. Further information can be found in Section 5B of the Female Genital Mutilation Act 2003

## Ritualistic Abuse linked to spirit possession

Some faiths believe that spirits and demons can possess people (including children). The use of any physical or psychological violence to get rid of the possessing spirit is abusive and should always be reported. Successful prosecution will result in a criminal conviction of those using this form of abuse even if the intention is to help the child. Further information is available here [Faith abuse](#)

## Radicalisation and Extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities, which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should remain alert to the risk of radicalisation into white supremacy extremism.

School staff receive training to help to identify signs of extremism and there is a risk assessment completed to identify any areas of concern. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014). All staff complete the on line Channel training.

The Prevent programme is a key part of the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. Schools and governing bodies have a critical part to play. The Department of Education guidance 'Keeping Children Safe in Education', refers to the risks of radicalisation and the guidance contains links to the Channel process. Channel is a key element of the Prevent strategy. It is a multi-agency approach to protect people from radicalisation. It is about safeguarding children and adults from being drawn into terrorist related activity. It is not an entry to the criminal justice system but a needs based support and intervention programme. All staff complete the Channel online training.

Here are examples of indicators that *may* suggest vulnerability to violent extremism:

- **Expressed opinions** – such as support for violence and terrorism or the values of extremist organisations
- **Material** – possession of extremist literature; attempts to access extremist websites and associated password protected chat rooms; possession of material regarding weapons, explosives or military training
- **Behaviour and behavioural changes** – such as withdrawal from family and peers; hostility towards former associates and family; association with proscribed organisations and those that hold extremist views
- **Personal history** – Claims or evidence of involvement in organisations voicing violent extremist ideology or attendance at military/terrorist training

A practitioner from any agency working with the child, young person or adult could be the person to recognise that there has been a change in the individual's behaviour that may suggest they are vulnerable to violent extremism.

Staff and visitors to the school must refer all concerns about children and young people who show signs of vulnerability or radicalisation to the Designated Safeguarding Lead. Designated Safeguarding Lead will refer cases to the [Channel programme](#) where there is a radicalisation concern as required; also support staff that make referrals to the Channel programme; completing appropriate risk assessments. [The Prevent Duty](#)

## Visiting Speakers

The Prevent Duty sets out an expectation of clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised. This includes a formal procedure for inviting speakers which involves approval by the Headteacher/Principal, appropriate checks on the suitability of the person, documented agreement that they understand they must abide by the Academies equality commitments including no statements that might cause offence to others or undermine tolerance of faiths or beliefs and no extremist material. Academy staff will know the content of the presentation before the event. Staff will bring any presentation that proves to be unsuitable will be brought to an early end by staff. Any presentation to raise funds will be with written permission by the Headteacher/Principal only. Normal visitor to the Academy procedures will be followed.

## Work Experience (Secondary Academies)

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience, which are in accordance with the guidance in KCSIE.

## Children staying with host families

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable. In such circumstances, the school follows the guidance in KCSIE to ensure that hosting arrangements are as safe as possible and all relevant and appropriate checks are completed.

## Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. Should Academy Staff become aware of a Private Fostering arrangement they will inform the DSL who will consult with the family and if appropriate will inform Social Care. [Private fostering](#)

**It is a statutory duty for the school to inform the Local Authority when it is made aware of a child or young person being subject to private fostering arrangements.**

## Physical Intervention/Use of Reasonable Force

There are circumstances when it may be appropriate for staff to use reasonable force to safeguard pupils. This covers a range of actions used by staff that involves a degree of physical contact to control or restrain children. 'Reasonable' in these circumstances means 'using no more force than is needed' Key staff have been trained in Positive Handling and will only exercise this duty when all de-escalation or distraction strategies have failed and as a last resort or in an emergency situation to prevent serious harm. Use of reasonable force will be recorded on the TSAT Positive Handling incident form and parents and carers will be notified as soon as it is reasonable to do so. Some identified pupils may have a Positive Handling Plan in place, which has been completed by staff, parents/carers and pupil, all having contributed to ensure the appropriateness of the interventions stated in the plan. We understand that physical intervention of a nature, which causes injury or distress to a child, may be considered under child protection or disciplinary procedures. We recognise that touch is appropriate in the context of working with children, and all staff have been given Positive Handling guidance to ensure they are clear about their professional boundary. [DfE Use of Reasonable Force](#)

## Abuse of position of trust

All Academy staff are aware that inappropriate behaviour towards pupils is unacceptable and that

their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence.

**The Staff Behaviour Policy/Code of Conduct states our expectations of staff. It is signed by all staff.**

## **Staff/Pupil online relationships**

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation. The ICT Acceptable Use policy and Mobile Devices are available on the website.

## **Allegations against staff**

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

When an allegation is made against a member of staff, our set procedures must be followed. The Headteacher on all such occasions where the threshold for LADO has been met will discuss the content of the allegation with the Local Authority Designated Officer (LADO).

The full procedures for dealing with allegations against staff can be found in KCSIE and in the school's Managing Allegations against Staff policy and procedures. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers, will be given at induction and are in the Staff Code of Conduct Policy.

All staff should be aware of their duty to raise concerns about the attitude and actions of colleagues. The vast majority of adults who work with children in education settings act professionally and seek to provide a safe and supportive environment, which secures the wellbeing and very best outcomes for children and young people in their care. Much relies on pupil and staff interactions where tensions and misunderstandings can occur. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

We understand that a pupil may make an allegation against a member of staff. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Headteacher/Principal. If the allegation made to a member of staff concerns the Headteacher/Principal, the person receiving the allegation will immediately inform the Deputy CEO, who will contact the LADO where threshold to do so has been met, without notifying the Headteacher/Principal first.

If an allegation is made about a member of the Proprietor Body, the person receiving the allegation will immediately inform the Deputy CEO, who will contact the LADO where threshold to do so has been met.

In some circumstances, the Academy may have to consider an allegation against an individual not directly employed by the Academy. In these circumstances, we will ensure that the allegation is dealt with properly. The employer of that person will be informed as will the LADO where threshold to do so has been met. Allegations concerning staff who no longer work at the Academy or historical allegations will be reported to the Police and LADO as applicable.

## Whistle blowing if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The Thinking Schools Academy Trust whistleblowing code enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place and is available on the website.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Headteacher/Principal. Complaints about the Headteacher/Principal should be reported to the Deputy CEO.

The NSPCC whistle-blowing helpline number 0800 028 0285. 8:00 AM to 8:00 PM, Monday to Friday <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

General guidance on whistleblowing can be found via <https://www.gov.uk/whistleblowing>

## Staff training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. All members of staff are trained in and receive regular updates on safeguarding children and young people including e-safety, online abuse, Child Sexual Exploitation, FGM, Domestic Abuse to name but a few as well as how and who to report concerns.

New staff and governors will receive a briefing during their induction, which includes the Academies child protection policy and staff behaviour policy, reporting and recording arrangements, and details for the DSL. All staff, including the DSL, Headteacher (unless the Headteacher is the DSL) and governors will receive training that is regularly updated. All staff will also receive a wide range of comprehensive safeguarding and child protection updates via email, weekly bulletins, website access and staff meetings throughout the year.

Staff understand the difference between a 'concern' and 'immediate danger or at risk of harm' ensuring appropriate action is taken through whole school safeguard training and weekly safeguarding bulletins. All members of staff, volunteers and governors know how to respond to a pupil who discloses abuse through delivery of whole school safeguard training.

## Safer recruitment

Our Academy complies with the requirements of Keeping Children Safe in Education (DfE 2020) Part 3 and the MSCP by carrying out safer recruitment checks for all new employees. The Academy follows the Thinking Schools Academy Trust Staff Recruitment and DBS policy and procedures, which can be found at [www.tsatrust.org.uk](http://www.tsatrust.org.uk)

At least one member of each recruitment panel will have attended safer recruitment training and at least two people will carry out the shortlisting exercise

All new employees (involved in early year's settings and/or before or after school care for children under eight) are made aware of the 2018 Childcare Disqualification Regulations and their obligations to disclose relevant information to the school. This is captured through the New Starter pack.

The Academy obtains written confirmation from supply agencies or third party organisations that agency staff or other individuals who may work in the Academy have been appropriately checked.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.

The Academy maintains a single central record of recruitment checks undertaken and is audited on a regular basis by the Headteacher/Principal, Chair of the RGB and TSAT Head of Safeguarding.

## Volunteers

Volunteers, including governors, will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

## Contractors

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school's day.

## Site security

School has developed a system in-line with guidance below to ensure that [regulated and non-regulated activities](#) and staff supervision is understood across the school. The identification of volunteers, students, visitors can be clearly identified by our visitor system.

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. Any individual who is not known or identifiable should be challenged for clarification and reassurance. Academies have a responsibility for identifying approved adults who are collecting children from school.

All visitors are expected to observe the school's safeguarding and health and safety regulations. The Headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

The Academy will not accept the behaviour of any parent or individual that threatens the Academy security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in the decision to refuse access onto the Academy site for that individual. See the Trust Parent/Career Conduct Policy.

All staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-community ethos and welcome comments from pupils/students, parents and others about areas that may need improvement as well as what we are doing well.

Our lettings policy will seek to ensure the suitability of adults working with children on Academy sites at any time. Community users organising activities for children are aware of the Academy child protection guidelines and procedures provided as part of the lettings arrangement.

## Extended school and off-site arrangements

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the Academy, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our Academy we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

## Child protection procedures

### Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2020) refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

### Prevention

We recognise that the Academy plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The Academy community will therefore:

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with children e.g. through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtime.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE, opportunities, which equip children with the skills they need to, stay safe from harm and to know to whom they should turn for help. In particular, this will include anti-bullying work, e-safety, road safety, pedestrian and cycle training. Also focussed work in Year 6 to prepare for transition to secondary school and more personal safety/independent travel.
- Ensure all staff are aware of Academy guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks

### Taking action

**Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.** Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary call 999
- report your concern as soon as possible to the DSL. The timing of such referrals should reflect the level of perceived risk of harm, not longer than **within one working day** of identification or disclosure of harm or risk of harm.
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern



- seek support for yourself if you are distressed.

## [NSPCC when to call the Police](#)

### **If you are concerned about a pupil's welfare**

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use Safeguard to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL.

### **If a pupil discloses to you**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL. All staff must be aware that they cannot promise a child to keep secrets, which might compromise the child's safety or wellbeing, staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not be afraid of silences
- **Do not promise to keep secrets** –find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others. *NB: If the child is Fraser competent (i.e.)* Professionals working with children need to consider how to balance children's rights, wishes and sharing information with their responsibility to keep children safe from harm. Underage sexual activity should always be seen as a possible indicator of child sexual exploitation. Sexual activity with a child under 13 is a criminal offence and should always result in a child protection referral.
- **Only ask questions for clarification purposes** –at all times avoid asking questions that suggest a particular answer:
  - not automatically offer any physical touch as comfort
  - avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong
  - tell the pupil what will happen next
  - report verbally to the DSL even if the child has promised to do it by themselves
  - complete the **record of concern form** via Safeguard and send on to the DSL without delay
  - seek support if they/yourself feel distressed.

***Following completion of a record of concern, staff will be provided with a feedback of action taken by the DSL. Staff have a duty to challenge this action with the DSL if they disagree and retain a duty to refer to social care themselves if they believe this to be the correct course of action.***

## Working together with parents

The school is committed to working in partnership with parents/carers to safeguard and promote the welfare of child/ren and to support them to understand our statutory responsibilities in this area. We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child from harm.

We will seek to share with parents any concerns we may have about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the Designated Safeguarding Lead making a referral to Children's Social Care and Multi – Agency Risk Assessment Conference (MARAC) in those circumstances where it is appropriate to do so.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives;
- To hold two emergency contact numbers;
- Full names and contact details of all persons with parental responsibility (if different from above);
- Emergency contact details (if different from above);
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above);
- Any legal or criminal changes which effects parental responsibility e.g. Bail condition, contact orders, non-molestation orders, court orders, Multi – Agency Risk Assessment Conference (MARAC).

## Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence. Staff are expected to treat information they receive about children and young people in a discreet and confidential manner. Confidential information should never be used casually in conversation or shared with any person other than a need to know basis. The use PMR (walkie talkies) radios will not be used as a method of communication when discussing personal or sensitive safeguarding information.

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

However, following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, *Keeping Children Safe in Education 2020* emphasises that **any** member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled in line with the Data Protection Act 2018. Information sharing is guided by the following principles. The information is:

- necessary and proportionate
- relevant
- adequate

- accurate
- timely
- secure

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information with outside agencies. However, where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

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

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The Trust Subject Access policy is available to parents and pupils via the website or on request.

[Data Protection toolkit for schools](#)

## Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child. The below hyper link directs you to your local children's social care contact number; [Report-child-abuse-to-local-council](#)

## Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the designated safeguarding lead, their deputy, the Headteacher and the chair of governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

## Supporting Staff

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

Through the existing Academy system of performance management, mentoring and staff consultation arrangements, we will ensure that staff have routine opportunities to reflect on the well-being of their students and to consider if there are any safeguarding concerns or suspicions. We recognise that staff working in the Academy, who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing regular sessions to talk through their anxieties with the DSL and to seek further support as appropriate, through the Head of Safeguarding for the Trust. Decisions made in these meetings will be recorded.

## Appendix One

### Four categories of abuse

In most cases multiple issues will overlap with one another for further guidance:

Medway: [Promoting the welfare of children](#)

#### Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

#### Emotional abuse

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

#### Sexual abuse

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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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

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); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Domestic Abuse

The Government defines domestic abuse as "Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members regardless of gender or sexuality aged 16 or over" The abuse can encompass but is not limited to; physical, sexual, financial and emotional.

Children may suffer both directly and indirectly if they live in households where there is domestic violence. Domestic abuse is likely to have a damaging effect on the health, development and welfare of children. Domestic Abuse can also occur within their own intimate relationships.

To help protect and safeguard children within schools, the Police in Medway and Kent, will be sharing brief summaries of Police reports with the Academy following a domestic abuse incident. We hope this information will ensure we are best placed to help and support our children and families.

If you need help and support to deal with domestic abuse there is a very good website giving information on all local resources at: <https://www.nhs.uk/livewell/abuse/pages/domestic-violence-help.aspx> [Domestic abuse](#)

## Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority

- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.

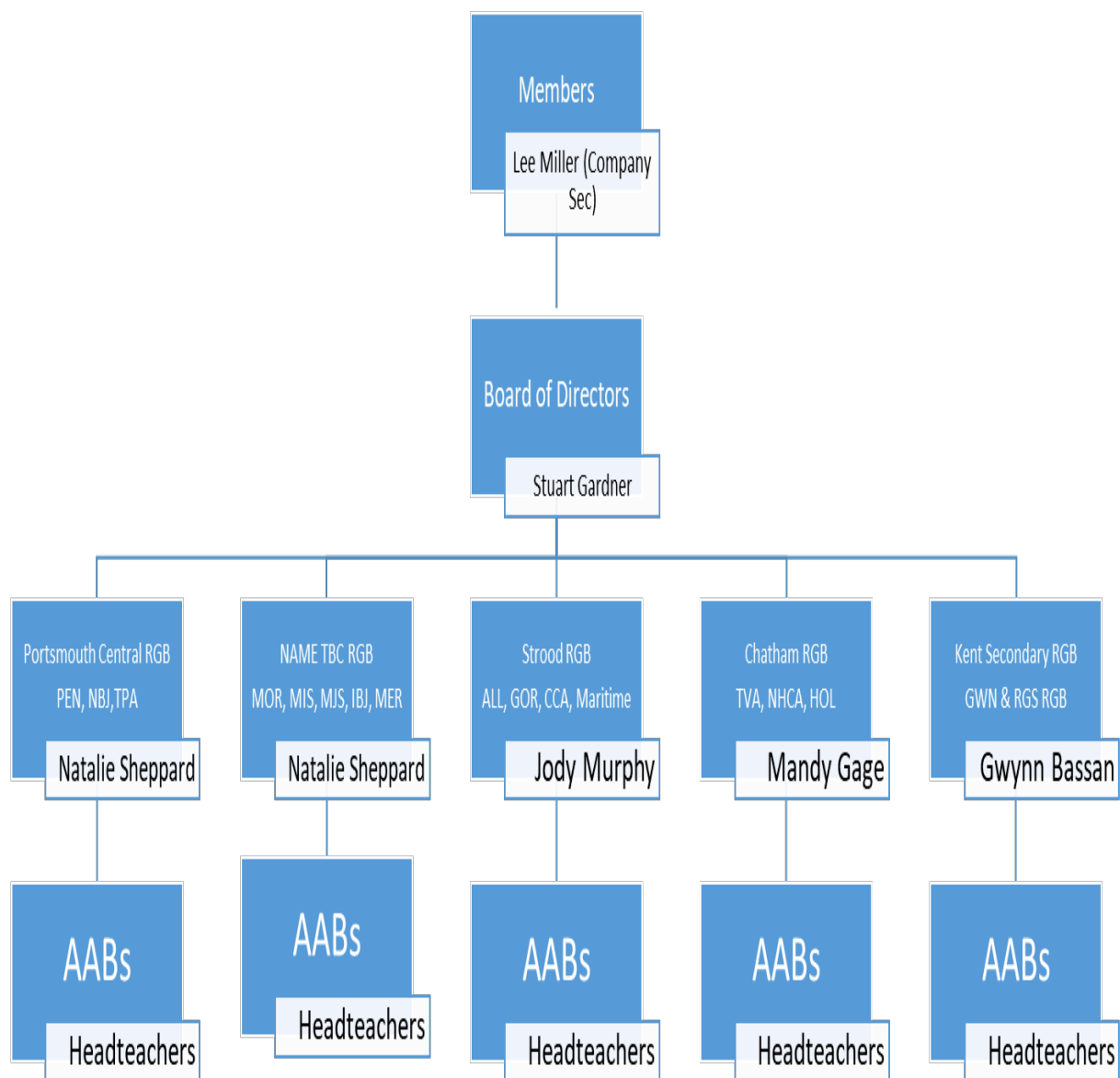
Individual indicators will rarely in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

## **Appendix Two**

### **Related Safeguarding policies**

- Staff behaviour/code of conduct
- Behaviour Management Policy and Guidelines for the Use of Physical Intervention
- Complaints procedure
- Teachers Standards 2012
- Staff Code of Conduct 2015
- Safer Recruitment Guidelines
- Keeping children safe in education: childcare disqualification requirements
- Whistleblowing
- SEN
- Attendance and Missing children
- Management of safeguarding allegation
- E-Safety including the use of mobile devices
- ICT Acceptable Use Policy
- Subject Access Request and Information

## Governance Structure



**In addition to the Governance Structure, there is the position of Head of Safeguarding**

**Mrs Lee Lucas**

## Safeguarding Team at Holcombe Grammar School

INSERT ACADEMY NAME Safeguarding Team	
Role	Name
Designated Safeguarding Lead for Children and Families.	Miss Sue Gould
Deputy Designated Officer/s	Mr Andrew Anderson Miss Ruby Mourino Miss Dawn Sutton Miss Tracy King
Board Safeguarding	Linda Randall
Linked Regional Governor for Child Protection and Safeguarding	Mr Michael Bailey
Linked Academy Advisory Board for Child Protection and Safeguarding	Ms Omolayo Sokoya

### **Thinking Schools Academy Trust**

Lee Lucas, Head of Safeguarding

Telephone: 01634 336535 07970 741 979

Email: [l.lucas@tsatrust.org.uk](mailto:l.lucas@tsatrust.org.uk)

**Medway LADO** 01634 331065

**Social Care** 01634 334466

**Emergency Out of Hours** 03000 41 91 91



## Medway Safeguarding Children's Partnership Flow Map

### Why are you concerned?

- For example
  - Allegation/ child shares a concern or worry
  - Indicators of abuse or neglect

### Immediately record your concerns

- Follow the schools procedure (**Use Safeguard to record concern and inform DSL**)
  - Reassure the child
  - Clarify concerns if necessary (**TED: Tell, Explain, Describe**)
  - Use child's own words

Inform the Designated Safeguarding Lead (**Name contact information**)

### Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the MSCP [Inter-Agency Threshold Criteria for Children in Need](#) for further guidance.
- If the child is **at imminent risk of harm** a referral will be made to First Response – 01634 334466
- If the child is **NOT** at imminent risk then a referral will be made via (**the portal**)
- If unsure then consult with First Response '**No Name Consultation line**' 9:30 – 12:30 (01634 33 1662) or the First Response on 01634 33 4466

### If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow Whistleblowing procedures

Pupils and Parents:

- Follow school complaints procedures (**Available on request or website**)

Record decision making and action taken in the pupil's Child Protection/safeguarding file

### Monitor - Be clear about:

- What action you have taken at the time of reporting the concerns.
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support (if necessary)

