



# Safeguarding and child protection policy September 2018

Office use

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<b>Associated documents:</b>			
Attendance Climate for Learning including: <ul style="list-style-type: none"> <li>• Anti-bullying</li> <li>• Behaviour management</li> <li>• Guidance on physical restraint</li> </ul> SEND		E-Safety Health and Safety Sex and Relationships Education Site Security Single Equalities including Race Equality	
<b>Links to:</b>			
<ul style="list-style-type: none"> <li>• <a href="http://www.gov.uk/government/publications/keeping-children-safe-in-education--2">www.gov.uk/government/publications/keeping-children-safe-in-education--2</a></li> <li>• <a href="http://www.gov.uk/government/publications/working-together-to-safeguard-children--2">www.gov.uk/government/publications/working-together-to-safeguard-children--2</a></li> <li>• <a href="http://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges">www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges</a></li> <li>• Refer to executive summary: NSPCC Briefing on key updates to statutory guidance for schools in England – Keeping Children Safe in Education (2018)</li> </ul>			

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## 1 Executive summary

This policy applies to all Diverse Academies Trust and National Church of England Academy Trust employees – collectively known as the Diverse Academies Learning Partnership (the ‘Trust’ or ‘organisation’) – and associated governors, Trustees and volunteers.

Diverse Academies Learning Partnership takes its safeguarding and child protection duties very seriously. We deem it to be everyone’s responsibility to ensure the safety and welfare of all of our children. To this end, our policy has, at its heart, the following key principles:

1. The five outcomes of the former DfE publication ‘Every Child Matters’
2. Prevention (creating and maintaining a climate of openness and trust for our children and staff)
3. Protection (through clear, unambiguous procedures and training)
4. Support (for all those who might have or have been subject to abuse)
5. Close, robust working with parents and other agencies
6. The recognition that ‘education’ should be regarded as the fourth safeguarding partner. In accordance with the 2017 consultation on ‘Working Together to Safeguard Children’, and subsequent Working Together statutory guidance document (Feb 2019) the Trust recognises the role of schools in providing effective safeguarding and child protection
7. We routinely utilise a system of internal audit (IA) of the safeguarding protocols and policy in each academy. This process accompanies the Full Trust Reviews and Interim Reviews, which lie at the heart of the Education Directorate’s CSI processes.

The IA tool is used as follows:

1. Annually by the Trust, in partnership with all academy DSLs, to ensure that safeguarding and child protection policy and practice is compliant and of the very best quality.
2. As required when any of the SST or CLG deem it necessary.
3. By the Education CSI team when carrying out Safeguarding and/or Child Protection Interim Reviews\*
4. By the Lead Reviewer when undertaking any Full Trust Review\*

\*Such reviews also make use of the safeguarding and child protection EFs.

In creating this policy, detailed attention has been given to the latest key publications:

1. Keeping children safe in education – Statutory guidance for academies and colleges (DfE - September 2018)
2. Working together to safeguard children (DfE February 2019)
3. Sexual violence and sexual harassment between children in schools and colleges (DfE, May 2018)

4. Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government July 2018)
5. Children and Social Work Act (2017)
6. Inspecting safeguarding in early years, education and skills settings (Ofsted, August 2016)
7. Disqualification under the Childcare Act 2006. Statutory guidance for local authorities, maintained Academies, independent Academies, academies and free Academies (DfE June 2016)
8. Guidance for inspectors: what to do if a child or young person discloses a safeguarding concern (Ofsted, February 2016)
9. Prevent duty guidance for England and Wales (HM government 2015)
10. Early years inspection handbook (Ofsted, August 2015)
11. What to do if you're worried a child is being abused: advice for practitioners (DfE, March 2015)
12. Statutory framework for the early years' foundation stage (DfE, 2014)
13. Children Act (1989)

Put simply, safeguarding is everyone's responsibility and, where necessary, everyone's 'problem'.

## **2 Trust commitment**

The Diverse Academies Learning Partnership is firmly committed to the opening comments of Keeping Children Safe in Education (2018) which clearly states that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers at the Diverse Academies Learning Partnership has a role to play in safeguarding children.

The Diverse Academies Learning Partnership fully recognises the contribution it can make to protect and support children and staff in the two Trusts (NCEAT and DAT). The aim of the policy is to safeguard and promote our children's welfare, safety and health by fostering an honest, open, caring and supportive climate. The child's welfare is of paramount importance.

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (2015) as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

The Trust remains committed to the five goals of Every Child Matters:

- Stay Safe
- Be Healthy
- Enjoy and Achieve
- Achieve Economic Wellbeing
- Make a Positive Contribution

The Trust adopts an open and accepting attitude towards children as part of its responsibility for Pastoral care. Staff hope that children and parents will feel free to talk about any concerns and will see the Trust as a safe place when there are difficulties. Children's worries and fears will be taken seriously and children are encouraged to seek help from members of staff. Our policy applies to all staff, governors and volunteers working in the Trust and takes into account statutory guidance provided by the Department for Education and local guidance issued by both the Lincolnshire and Nottinghamshire Safeguarding Children Boards. We will ensure that all parents/carers are made aware of our responsibilities with regard to child protection procedures and how we will safeguard and promote the welfare of their children through the publication of this Trust's 'safeguarding and child protection policy'.

The Trust has a firm commitment to include safeguarding matters on several agendas:

- annual refresher training for all staff; biannual training for the DSL; whole Trust compliance training via the EduCare online training platform
- a fully compliant Single Central Register
- a link member of the Trustees with a specific Safeguarding remit who will provide the NCEAT and DAT Trustees with separate Link Governor Reports.
- triannual updates to the Trustees (in NCEAT and DAT) via the Trust Improvement Report.
- updates to the Trustees via the PDBW SDG.
- updates through the Challenge, Support and Intervention (CSI) programme.

### **3 Key documents**

These duties and responsibilities as set out within the Education Act 2002 sec 175 and 157, DfE revised 'Statutory Guidance Keeping Children Safe in Education' 2018 and 'Working Together to Safeguard Children' 2019 which are incorporated into this policy.

#### **Keeping Children Safe in Education (2018)**

[www.gov.uk/government/publications/keeping-children-safe-in-education--2](http://www.gov.uk/government/publications/keeping-children-safe-in-education--2)

- The DfE have updated Keeping Children Safe in Education (KCSIE) for 2018. The final guidance was made available in May 2018 and commenced on the 3rd September 2018.

## **Working Together to Safeguard Children (2019) - updated version**

[www.gov.uk/government/publications/working-together-to-safeguard-children--2](http://www.gov.uk/government/publications/working-together-to-safeguard-children--2))

## **What to do if you're Worried a Child is Being Abused (2015)**

([www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2](http://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2))

Children includes everyone under 18 years of age.

Safeguarding is not just about protecting children from deliberate harm. It also relates to broader aspects of care and education including:

- children's health and safety and well-being, including their mental health
- meeting the needs of children with special educational needs and/or disabilities
- the use of reasonable force
- meeting the needs of children with medical conditions
- providing first aid
- educational visits
- intimate care and emotional wellbeing
- online safety and associated issues
- appropriate arrangements to ensure Trust security, taking into account the local context

Safeguarding can involve a range of potential issues such as:

- neglect, physical abuse, sexual abuse and emotional abuse
- bullying, including online bullying (by text message, on social networking sites, etc.) and prejudice based bullying
- racist, disability and homophobic or transphobic abuse
- gender based violence
- extremist behaviour and/or radicalisation
- child sexual exploitation and trafficking
- modern slavery – (a definition of modern slavery is found in the appendix)
- the impact of new technologies, including 'sexting' and accessing pornography
- teenage relationship abuse
- peer on peer abuse – (a definition of peer-on-peer abuse is found in the appendix)
- substance misuse
- issues which may be specific to a local area or population, for example gang activity and youth violence
- particular issues affecting children including domestic violence, female genital mutilation and honour based violence and forced marriage – updated information on 'honour based violence' is found in Annex A of KCSIE 2018

We will therefore:

- establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to
- ensure that children know that there are adults in the Trust whom they can approach if they are worried or are in difficulty
- include in the DALP Academies curricula, activities and opportunities to explore issues which equip children with the skills they need to stay safe (from abuse) and which will help children develop realistic attitudes to the responsibilities of adult life (particularly with regard to childcare and parenting skills)
- ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies
- operate safe recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children, including all Disclosure and Barring Service (DBS) checks
- work with all agencies with regard to vulnerable/ missing children and children at risk of sexual exploitation

#### **4 Elements of the safeguarding policy**

There are several sections to our policy including:

- providing a safe environment in which children can learn and develop
- ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with children
- developing and then implementing procedures for identifying and reporting cases, or suspected cases of abuse
- supporting children who have been abused or harmed in accordance with his/her child protection plan
- raising awareness of safeguarding children, child protection processes and equipping children with the skills needed to keep them safe

The core elements of the policy consist of:

- prevention (e.g. positive climate for learning, teaching and pastoral support to children)
- protection (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding concerns)
- support (to children and Trust staff and to children who may have been abused)
- working with parents (to ensure appropriate communications and actions are undertaken)

This policy applies to all staff, governors and visitors to the Trust.

Where the Trustees provide services or activities directly under the supervision or management of staff, the Trust's arrangements for safeguarding will apply. Where services or activities are provided separately by another body, the Trustees should seek assurance that the body concerned has appropriate policies and procedures in place to safeguard and protect children and there are arrangements to liaise with the Trust on these matters where appropriate.

**The Trust will follow the procedures set out by the Lincolnshire (LSCB) and Nottinghamshire Safeguarding Children Boards (NSCB) and take account of guidance issued by the DfE in Keeping Children Safe in Education 2018 to:**

- ensure, that in each Academy, we have a designated safeguarding lead and a deputy safeguarding lead for child protection who has received appropriate training and support for this role
- ensure, that in each Academy, we have a nominated Trustee responsible for child protection
- ensure, that in each Academy, we have a designated member of staff for 'looked after children'
- ensure, that in each Academy, every member of staff (including temporary and supply staff and volunteers) and the Trustees know the name of the designated safeguarding lead (and their deputy) responsible for child protection and their role
- ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated safeguarding lead or to children's social care/police if a child is in immediate danger
- ensure all staff are aware of the process for making referrals to children's social care and for statutory assessment that may follow a referral, along with the role they might be expected to play in such assessments
- ensure all staff and volunteers are aware of the early help process and understand their role in it
- staff with any concerns should always speak / report to the designated safeguarding lead or deputy
- ensure that there is a whistleblowing policy and culture where staff can raise concerns about unsafe practice and that these concerns will be taken seriously
- ensure that there is a complaints system in place for children and families
- ensure that parents have an understanding of the responsibility placed on the individual Academy and their staff for child protection by setting out its obligations in the Academy prospectus



- notify Children’s Social Care if there is an unexplained absence of a pupil who is subject to a child protection plan
- develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at child protection conferences
- keep written records of concerns about children, even where there is no need to refer the matter immediately; documenting and collating information on individual children to support early identification, referral and actions to safeguard
- ensure all records are kept securely; separate from the main pupil file, and in locked locations
- ensure that we follow robust processes to respond when children are missing from education or missing from home or care
- develop and then follow procedures where an allegation is made against a member of staff or volunteer
- ensure safe recruitment practices are always followed
- apply confidentiality appropriately
- apply the escalation policy if there is any concern about the actions or inaction of social care staff or staff from other agencies

## 5 Roles and responsibilities

All adults working with or on behalf of children have a responsibility to safeguard and promote the welfare of children. There are, however, key people within the Diverse Academies Learning Trust who have specific responsibilities.

Role	Name	Contact Details
Designated Trustee for Child Protection	Margaret Blore	<a href="mailto:mblore@dalp.org.uk">mblore@dalp.org.uk</a>
Designated Safeguarding Lead	Patrick Knight, Executive Assistant Principal PDBWI	<a href="mailto:pknight@dalp.org.uk">pknight@dalp.org.uk</a>
Designated Quality Assurer for Standards & the Internal Auditing Manager of Safeguarding	Karen Bonser, Business Development, Standards and Projects Manager	<a href="mailto:kbonser@dalp.org.uk">kbonser@dalp.org.uk</a>
LADO Allegations	Eva Callaghan - Schools, FE Colleges and Early	Telephone: 0115 8041272 Address: Officer Meadow House, Littleworth, Mansfield, NG18 2TB

	Years (including nurseries & childminders)	
MASH (Multi-agency Safeguarding Hub)		Telephone: 0300 500 80 90 Fax: 01623 483295 Email: <a href="mailto:mash.safeguarding@nottscc.gcsx.gov.uk">mash.safeguarding@nottscc.gcsx.gov.uk</a> Address: Piazza, Little Oak Drive, Sherwood Business Park, Annesley, Nottinghamshire NG15 0DR

## 6 Designated safeguarding lead (DSL)

The Trust has a designated safeguarding lead who takes lead responsibility for safeguarding children and child protection through delegation to named staff in each academy. The Trust DSL has received appropriate training and support for this role. The Trust designated safeguarding lead is a senior member of the DALP leadership team and their responsibilities are explicit in their job description.

Where it is believed that a child may be suffering, or may be at risk of suffering significant harm, the DALP DSL ensures that the Academy DSL follows the safeguarding procedures. The DSL also ensures that full records are kept of any safeguarding issue.

The DALP DSL also quality assures safeguarding across the family of academies through regular contact with each respective academy safeguarding lead. Through PDBW Senior Development Group (SDG) and the Designated Safeguarding Lead Team Network Groups (TNG) the Trust oversees developments and trends in safeguarding within the group of all Academies.

All staff are aware of the need to record and report concerns about a child or children in each Academy within DALP. The DSL at DALP delegates responsibility for such records and for deciding at what point these records should be passed over to other agencies to each academy DSL. Archived safeguarding records are held separately from a child's file and in secure storage.

The software used across all DALP academies to record and report on all safeguarding matters is 'My Concern'. Monitoring of safeguarding across DALP academies universally uses this system by reading off the academy's respective SMS – SIMS or Scholarpack.

The DALP DSL monitors safeguarding trends across the Trust using the My Concern reporting tool. This feeds into annual reporting to Trustees.

### Referrals

The DALP DSL when necessary, will, in conjunction with an individual academy's designated safeguarding lead:

- refer cases of suspected abuse or allegations to the relevant investigating agencies
- act as a source of support, advice and expertise within the educational establishment when deciding whether to make a referral by liaising with relevant agencies
- liaise with the respective DSL and Principal to inform him/her of any issues and ongoing investigations and ensure there is always cover for this role
- refer cases of suspected abuse or allegations to the relevant investigating agencies
- refer cases where a person is dismissed or left due to risk/ harm to a child and the DBS as required
- liaise with the academy and the LADO where there are concerns about a staff member
- be alert to the specific needs of children in need, those with educational needs and young carers
- take part in strategy discussions or attend inter-agency meetings and/or support other staff to do so and to contribute to the assessment of children
- liaise with the local authority and other agencies in line with the most recent guidance in Working Together to Safeguard Children
- ensure that in exceptional circumstances, where the DSL / DDSL is not available, provision / staffing is in place so there is no delay in an academy undertaking appropriate action
- should ensure that relevant child protection files are transferred to the new school or college should the child move on, and {be responsible for} the process for doing this
- should be aware of the new arrangements for Looked After Children, in accordance with section 95 to 100 of KCSIE 2018

## **Training**

- formal Level 3 designated safeguarding lead training will be undertaken every two years. Informal training and updating of knowledge and skills will be at regular intervals, undertaken at least annually in each DALP academy and by staff with a designated safeguarding responsibility.
- the designated safeguarding lead is responsible for organising their own training and should obtain access to resources or any relevant refresher training.
- to recognise how to identify signs of abuse and when it is appropriate to make a referral.
- have a working knowledge of how Safeguarding Boards operate (including the process concerning the Pathway to Provision, Early Help Assessment Form (EHAF) and Early Help Unit), the conduct of a child protection case conference, and be able to attend and contribute to these effectively when required to do so.

- ensure each member of staff has access to and understands the Safeguarding policy, especially new or part-time staff who may work with different educational establishments.
- be able to keep detailed, accurate and secure records of referrals/concerns.
- understand the Prevent Duty and provide advice and support to staff on protecting children from the risk of radicalisation and Female Genital Mutilation – (a fuller description of ‘radicalisation’ has been added in Annex A of KCSIE 2018)
- encourage a culture of protecting children; listening to children and their wishes and feelings
- ensure staff are aware of the guidance on peer on peer abuse (KCSIE 2018) – section 89 to 90

### **Raising awareness**

The DSL in each DALP academy will:

- ensure the Academy’s Safeguarding policy annex is updated and reviewed annually in line with the DALP Safeguarding Policy Review, and work with the Trustees regarding this
- work strategically to ensure policies and procedures are up to date and drive and support development work within the Trust
- ensure parents have access to the Safeguarding policy which alerts them to the fact that referrals may be made and the role of the Academy and DALP in this process
- where children leave a DALP academy; ensure their Safeguarding file is copied by the academy DSL, for the new academy as soon as possible, but transferred separately from main pupil file
- ensure that all DALP staff have a copy of (and an understanding of) Keeping Children Safe in Education 2018 – Part One
- ensure that all relevant DALP staff receive statutory safeguarding and child protection training which is updated, using the EduCare online training package, every TWO years, as recommended by the Trust-wide safeguarding audit process.
- statutory training for all staff must include: PREVENT, Child Protection Refresher (existing staff) or Safeguarding Children & Young People (new staff to the Trust) and Female Genital Mutilation.
- in addition to this training all staff members receive child protection and safeguarding updates (specifically from the revised 2018 KCSIE document), but at least annually.
- in partnership with the Principal, ensure that at least one identified member of staff / governor on each interview panel is Safer Recruitment trained and that this accreditation was gained within the previous five years in accordance with the recommendations from the Safeguarding audit process 2017-18.

- ensure that training records are kept up to date for each member of staff and is fully recorded in the SCR by HRA's.
- ensure that all DALP staff are aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 and understand the role they may have in these assessments
- ensure that there is a structured procedure within the Trust and each Academy, which will be followed by all of the members of the Trust and / or Academy community in cases of suspected abuse
- be aware of the revised guidelines around Alternative Provision as set out in section 174 of KCSIE 2018 – 'each academy continues to be responsible for the safeguarding of that pupil...and should obtain written confirmation that appropriate checks have been carried out at that establishment'
- ensure that governing bodies, leadership and staff are aware of the new DfE advice on 'managing reports of child on child sexual violence and sexual harassment'- KCSIE Part 5 section 236-249 linked to the new document (link at top of the policy)

### **Availability**

During term time the designated safeguarding lead (or a deputy) is always be available (during Academy hours) for staff. Appropriate arrangements will be made for any out of hours' contact including holiday times.

## **7 The role of the DALP CEO and Trustees**

The CEO delegates responsibility to the Trust DSL to ensure that:

- the policies and procedures adopted by the Trustees are fully implemented, and followed by all staff
- sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed safeguarding whistle-blowing policies
- there are mechanisms in place to assist staff to understand and discharge their role and responsibilities as set out in the latest version of Part One of Keeping Children Safe in Education.

### **Trustees**

The Trustees will be collectively responsible for ensuring that safeguarding arrangements are fully embedded within each Academy's ethos and reflected in the Academy's and DALP's day to day safeguarding practices by:

- ensuring there is an individual member of the Trustees to take leadership responsibility for safeguarding and champion child protection issues within the Academy
- ensuring that the Academy has effective policies and procedures in line with the latest statutory guidance as well as with local NSCB guidance and monitor the Academy's compliance with them
- ensuring that safeguarding policies and procedures are in place for appropriate action to be taken in a timely manner to promote a child's welfare
- recognising the importance of information sharing between agencies. Ensuring co-operation with the local authority and other safeguarding partners
- appointing a designated safeguarding lead from the leadership team to take lead responsibility for safeguarding and child protection and a designated member of staff for Looked After Children, who is appropriately trained
- ensuring that all staff read at least part one of Keeping Children Safe in Education 2018 and ensure that there are mechanisms in place to assist staff to understand and discharge their role and responsibilities as set out in part one
- ensuring that the Trustees are collectively responsible for the Academy's safeguarding arrangements. All members of the Trustees will undertake training about child protection to ensure they have the knowledge and information needed to perform their functions and understand their responsibilities
- ensuring there is a training strategy in place for all staff, including the CEO, so that child protection training is undertaken by each member of staff annually; with formal, accredited refresher training at TWO yearly intervals. The designated safeguarding lead should also receive bespoke, refresher training for the role at two yearly intervals
- ensuring that ALL new staff undergo safeguarding child protection training at induction and that there are arrangements in place for staff to be regularly updated to ensure that safeguarding remains a priority. Training records must be kept up to date in the SCR
- ensuring that temporary staff and volunteers who work with children are made aware of the Academy's arrangements for child protection and their responsibilities
- ensuring that there are specific procedures in place to manage safeguarding allegations against staff, and that these are understood as being distinct from wider whistleblowing protocols.
- exercising their discretion and disciplinary function in respect of safeguarding allegations against a member of staff or as a consequence of dealing with a complaint

- ensuring that the Trustees and DSL understand how to use the reporting protocol based on discretion and hierarchy if there is a safeguarding allegation against the Principal, Senior Executive Leader, LAB member(s) or CEO
- ensuring appropriate responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, including child sexual exploitation and to help prevent the risks of their going missing in future
- ensuring that appropriate filters and monitoring systems are in place to protect children online
- ensuring that children are taught about safeguarding online through teaching and learning opportunities
- ensuring that peer on peer abuse is included in safeguarding child protection policy, sexting and the Academy's response is included and different gender issues that are prevalent in peer on peer abuse
- giving staff the opportunities to contribute and shape safeguarding arrangements and policy
- prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, making decisions about additional checks and ensuring volunteers are supervised as required
- ensuring at least one person on any appointment panel has undertaken safer recruitment training
- recognising that certain children are more vulnerable than others, such as looked after children and children with special educational needs and disabilities.
- Trustees, designated safeguarding leads and academy leaders should make themselves aware of the new guidelines around 'volunteers' as set out in sections 159-161 in KCSIE 2018

## **8 Training**

The Trust will ensure that safeguarding training will be available to all members of staff at the appropriate times. This will include:

- Trust Leaders:
  - The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will complete training every two years
  - The Trust will ensure those members of staff with Safer Recruitment Training undertake this training every five years.
- Staff:

- All new DALP employees will complete initial safeguarding training via the EduCare Online training facility. Staff will be expected to achieve a pass rate of higher than 80% to achieve safeguarding trained status.
- **Governors:**
  - All new Governors will also complete initial safeguarding training via the EduCare Online training facility. Governors will be expected to achieve a pass rate of higher than 80% to achieve safeguarding trained status.
- **Safer Recruitment Training:**
  - Following the Trust Staffing (England) Regulations 2009 the Trustees will ensure that at least one person on any recruitment panel has undertaken safer recruitment training. The Trust follows all revised guidelines set out in Part 3 of KSCIE 2018 regarding safer recruitment.

All Trust (central team) and Academy staff will receive annual refresher training organised by the respective Designated Safeguarding Lead and will receive detailed guidance as well as Part One of Keeping Children Safe in Education; staff will be expected to confirm in writing that they have received and read this section – a record of which must be kept. The Trust will ensure that an accurate, up to date Single Central Register outlines when such training is due for renewal as well as the details surrounding all Disclosure and Barring Service (DBS) checks.

All staff and members of the Trustees are encouraged to communicate directly with the Trust DSL in regards to the annual policy review: [pknight@dalp.org.uk](mailto:pknight@dalp.org.uk)

Feedback and comments will then be used by the DSL in order to update the annual policy review which is shared with staff in September of each calendar year.

## **9 Supporting vulnerable children**

Our Trust recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth. This Trust may be the only stable, secure and predictable element in the lives of children at risk. Their behaviour may still be challenging and defiant or they may be withdrawn. Decisions about high level punishments such as isolation or exclusion need to take into account the child's individual circumstances.

It is also recognised that some children who have experienced abuse may in turn abuse others. This requires a considered, sensitive approach in order that the child can receive appropriate help and support. We recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The Trust academies may be the only stable, secure and predictable element in the lives of children at risk. When being educated at Trust academies their behaviour may be challenging



and defiant or they may be withdrawn. We also recognise that there are children who are more than vulnerable than others, which included children with special educational needs and / or disabilities.

Safeguarding is not just about protecting children from deliberate harm. It also relates to aspects of Trust / academy life including:

- children's health and safety
- the use of reasonable force
- meeting the needs of children with medical conditions
- providing first aid
- educational visits
- intimate care
- internet or e-safety
- appropriate arrangements to ensure Trust / academy security, taking into account the local context

Safeguarding can involve a range of potential issues such as:

- bullying, including cyber bullying (e.g. by text message, on social networking sites) and prejudice based bullying
- racist homophobic or transphobic abuse
- extremist behaviour
- child sexual exploitation
- sexting
- substance misuse
- issues which may be specific to a local area or population, for example gang activity and youth violence
- particular issues affecting children including domestic violence, sexual exploitations, female genital mutilations and forced marriage

The Trust will endeavour to support children through:

- the curriculum, to encourage self-esteem and self-motivation, including how to stay safe online
- the Trust ethos, which promotes a positive, supportive and secure environment, and which gives all children and adults a sense of being respected and valued
- the implementation of the Trust (DAT and NCEAT) policies
- a consistent approach, which recognises and separates the course of behaviour from that which the child displays. This is vital to ensure that all children are supported within the Trust

- liaison with other agencies that support the pupil such as Children's Social Care (in line with the Pathway to Provision), behaviour and attendance service and education psychology service, use of Complex Case Resolution Meetings and the Early Help Assessment Form (EHAF), etc.
- a commitment to develop productive, supportive relationships with parents, whenever it is in the child's interest to do so
- the development and support of a responsible and knowledgeable staff trained to respond appropriately in Safeguarding situations
- the work of the Inclusion Department
- liaison with the Chaplaincy Team – if applicable
- ensuring that where a child leaves and is subject to a child protection plan or where there have been wider safeguarding concerns, their information is transferred to the new Trust / school / academy immediately and that the child's social worker is informed

### **Supporting Children with Disabilities**

The available UK evidence on the extent of abuse among disabled children suggests that some may be especially vulnerable to abuse, for example those who have difficulty communicating. Trust staff who work in any capacity, with children with profound and multiple disabilities, sensory impairment and/or emotional and behaviour problems will be particularly sensitive to signs of abuse.

Children with disabilities and learning difficulties are particularly vulnerable to abuse because:

- they may not be able to articulate their worries
- they may not recognise that what is happening is inappropriate
- they are dependent on particular individuals for intimate care

It must also be stressed that in a home where there is domestic violence, drug or alcohol abuse, children may also be vulnerable and in need of support.

### **Looked After Children – the role of the Designated Safeguarding Lead**

- A teacher is appointed in each DALP academy who has responsibility for promoting the education achievement of children who are looked after. They report to their academy DSL, who, when appropriate, reports to the DALP DSL. They have the appropriate training and are encouraged to attend networking meetings / workshops as and when appropriate. The designated teacher will work with the Academy to ensure that the progress of the child is supported.
- The DALP designated safeguarding lead will also delegate responsibility for the day-to-day liaison between the child's social worker and the name of the Local Authority Virtual Head. The academy designated safeguarding lead will work closely with the designated teacher

as we recognise that children may have been abused or neglected before becoming looked after and we need to ensure their ongoing safety as well as supporting their education and development by linking with the designated safeguarding lead, their social worker and parents where appropriate.

## **10 Identifying children who may benefit from early help**

The guidelines in this policy clearly outline the areas of abuse that staff need to be aware of. Staff in all DALP academies are also aware to recognise those children who may benefit from early help. Full details of early help can be found in Chapter 1 of the latest Working Together to Safeguard Children 2019

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

Should any child emerge that may require early help staff will raise those concerns immediately with the DSL. The DSL will then consult the Nottinghamshire Pathway to Provision document to consider whether thresholds have been met. Staff also have the option of contacting the Nottinghamshire Early Help Unit for advice and support via 01623 433500 or via email at [early.help@nottsc.gov.uk](mailto:early.help@nottsc.gov.uk)

The Pathway to Provision document can be accessed here:

[www.nottinghamshire.gov.uk/media/2292/pathway-to-provision-final-version.pdf](http://www.nottinghamshire.gov.uk/media/2292/pathway-to-provision-final-version.pdf)

It is desirable that identified Trust staff have been trained in regards to the Early Help Assessment Framework document. Used in conjunction with the Pathway to Provision guidance, the EHAF enables staff at the Trust with a tool to quickly assess need and plan interventions appropriately. Where an EHAF is completed, this will be sent by secure email (or by a password protected document with the password sent separately) to the Early Help Unit.

A copy of the EHAF form can be found via this link:

[www.nottinghamshire.gov.uk/care/early-years-and-childcare/childcare-providers/early-help-assessment-form](http://www.nottinghamshire.gov.uk/care/early-years-and-childcare/childcare-providers/early-help-assessment-form)

In our Lincolnshire academy the following information is relevant:

Should any child emerge that may require early help staff will raise those concerns immediately with the DSL. The DSL will then consult the Lincolnshire Early Help Team to consider whether thresholds have been met. Staff also have the option of contacting the Lincolnshire Early Help Team for advice and support via [www.lincolnshirelscb.org.uk](http://www.lincolnshirelscb.org.uk)

The Pathway to Provision document can be accessed here:

Academy designated safeguarding staff have been trained in regards to the Early Help Assessment Framework document. Used in conjunction with the Pathway to Provision guidance, the EHAF enables staff at the academy with a tool to quickly assess need and plan interventions appropriately. Where an EHAF is completed, this will be sent by secure email to the Early Help Unit.

A copy of the EHAF online form can be found here:

[www.lincolnshire.gov.uk/childcare-and-family-support/special-educational-needs-and-disabilities/disability-and-sensory-impairment/early-support-care-coordination/referral-guide-and-eligibility-criteria/121006.article](http://www.lincolnshire.gov.uk/childcare-and-family-support/special-educational-needs-and-disabilities/disability-and-sensory-impairment/early-support-care-coordination/referral-guide-and-eligibility-criteria/121006.article)

## **11 Procedures and guidelines for all staff**

All policies relating to Safeguarding will be reviewed annually. These guidelines apply to all children in our Trust.

### **SAFEGUARDING IS EVERYONES RESPONSIBILITY**

- Children may be abused or placed at risk of harm in a family, institutional or community setting.
- Staff have a 'duty of care' to ensure that where abusive situations become known, they are dealt with, according to the clear guidance and procedures drawn up by the Lincolnshire and Nottinghamshire Area Safeguarding Committee.
- Additional barriers can exist that can make the identification of neglect and harm more difficult e.g. SEND children; staff need to be aware of this.
- Effective and efficient operation of Electronic Registration has a key role to play in safeguarding vulnerable children.

### **11a. Types of abuse – in accordance with KCSiE 2018**

**Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children**

**Physical abuse:** 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.

May be recognised by: Children with frequent injuries, injury such as bruising, bite marks, burns and scalds, fractures but also by aggressive behaviour. It may also be an indicator of concern where a parent gives an explanation inconsistent with the injury or gives several different explanations for the injury

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

May be recognised by: Developmental delay, attachment issues, aggressive behaviour, appeasing behaviour, watchfulness or stillness, low self-esteem, withdrawn or a loner, or having difficulty in forming relationships. Emotional abuse may be difficult to recognise as signs are usually behavioural rather than physical. Signs of emotional abuse may be associated or similar to other forms of abuse so presence of emotional abuse may indicate other abuse is prevalent as well.

**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.

May be recognised by: Inappropriate sexualised conduct, age inappropriate sexualised play or conversation, sexually harmful behaviour – contact or non-contact, self-harm, eating disorders, continual, inappropriate or excessive masturbation, anxiousness or unwillingness to remove

clothes – sports / PE etc., pain or itching in genital area, blood on underclothes, bruising in genital region and / or inner thighs etc.

**Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy 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.

May be recognised by: Being constantly hungry; constantly tired; have a poor state of clothing; be emaciated; have untreated medical problems; be frequently late or have poor or non-attendance at Trust; have low self-esteem; display neurotic behaviour and/or have poor social relationships, have poor personal hygiene. A neglected child may also be apathetic, fail to thrive, or be left with or in the care of adults under the influence of alcohol or drug misuse.

Children with Special Educational Needs: We recognise that children with special educational needs (SEN) and or disabilities can face additional safeguarding challenges. Children with SEN and or disabilities are especially vulnerable when identifying concerns due to their impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children which include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration
- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs and communication barriers and difficulties in overcoming these barriers.

**Child Sexual Exploitation:** Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, children are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Child sexual exploitation can happen in a number of ways to both boys

and girls, for example it can happen in the virtual world through various social media and this can still cause significant harm. It can happen through inappropriate relationships such as older boy/girlfriends or through parties, gangs or organised abuse. Some children will be particularly vulnerable to being exploited, for example if they have had a chaotic upbringing or if they are in care or go missing, involved in gangs or being bullied. We recognise however that any child can become a target for exploitation, particularly where the internet and social media are involved.

This is because the normal life events that go with being a child or teenager in today's age can be a challenge and make them susceptible to being groomed and exploited.

As a Trust we recognise that prevention is the best position with regard to CSE. We seek to support children to develop confidence and build resilience. We will endeavour to support their age appropriate knowledge and raise awareness and understanding of what CSE is, to understand the risks of CSE and to spot the warning signs for themselves and also their friends and peers and by doing so keep safe.

If prevention is not possible we aim to identify children who are at risk of, or being exploited very early. Early intervention is key to effectively working with the child to prevent or reduce the level of risk. Once they have been groomed some children will find it difficult to withdraw from their abusers and we need to contribute to helping to protect them. Some children feel that they are in a relationship with these people. We commit to working with our inter-agency partners to safeguard and protect children.

Much of this work will be through our programmes of personal, social and health education (PSHE) or through our Sex and Relationship Education (SRE) work – (note; RSE from 2019).

Some of the following signs may be indicators of sexual exploitation:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant
- children who suffer from changes in emotional wellbeing
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who are regularly absent or do not take part in education

**Sexting:** The Trust recognises that 'sexting' is a growing concern amongst professionals and parents as it can expose children to risks, particularly if the imagery is shared further. It can lead to embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing images of under 18s is also illegal.

There is no clear definition of what is 'sexting' and indeed many professionals, children and parents have different interpretations ranging from sending flirty messages to sending nude or semi-nude photographs via mobiles or over the internet.

This guidance is based on the UKCCIS Sexting in Academies and Colleges guidance 2016. The full guidance is located at UKCCIS 2016 Guidance

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

this guidance covers:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

It does not cover:

- the sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and academies should always inform the police and CSC
- children under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery

The term 'youth produced sexual imagery' has been adopted to provide some clarity and to distinguish it from imagery where there are adults involved in some manner.

The purpose of this guidance is to make expectations clear to children and their parents and carers as well as to be clear to staff about the Trust's policy and procedure in responding to incidents.

This policy forms part of our Trust's safeguarding arrangements and our response to concerns about 'sexting' will be guided by the principle of proportionality and our primary concern at all times is the welfare and protection of the children involved.

The Trust recognises that it is an offence under the Sexual Offences Act 2003 to possess, distribute, show and make indecent images of children (a child being under 18 year) but it does not define what is indecent.

However; the police accept that the law which criminalised indecent images of children was created before the technological advances of today and it originally sought to protect children from adults. It was not intended to criminalise children. Despite this, children who share sexual imagery



of themselves or peers are breaking the law and therefore we will seek to manage this type of case appropriately.

All professionals including the National Police Chiefs Council agree that incidents involving youth produced imagery should primarily be treated as a safeguarding issue. It is agreed that we should not unnecessarily criminalise children as the consequence of this can be significant in terms of their life chances in adulthood. Where children do share images it is often as a result of natural curiosity and exploring relationships and in the context of the digital world we live in.

The Trust is therefore empowered to deal with the majority of these incidents without involving the police.

### **Handling incidents**

The Trust may become aware of the issue in a variety of ways i.e. from the child direct, a friend of parent or a member of staff.

We recognise that the child is likely to be very embarrassed and worried about what might happen. We also recognise the pressure that is on a child can be under to take part in sharing such imagery but we will reassure them they are not on their own and will help and support them. We will also help them to understand what has happened and the context for the concerns. We will also discuss issues of consent and Trust within healthy relationships.

All incidents will be followed in line with our safeguarding and child protection policy. Where an incident comes to our attention:

- the incident will be reported to the specific academy Designated Safeguarding Lead (DSL) as soon as possible
- an initial meeting with the appropriate academy staff will be held to:
  - Establish if there is immediate risk & what further information is needed, whether or not the imagery has been shared
  - Consider facts about the children involved which could influence a risk assessment.

Further guidance and questions to consider is in Annexe A, page 31 UKCCIS Sexting in Academies Guidance 2016

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

- A meeting with the young person will be held (if appropriate)
- Parents will generally be informed at an early stage

An immediate referral to children's social care and/or the police should be made if at the initial stage:

- the incident involves an adult

- the child has been coerced, blackmailed or groomed or if there are concerns about capacity to consent
- if the sexual acts are unusual for the developmental age or violent
- children under 13 years are involved
- the child is at immediate risk e.g. suicidal or self-harming

Where the above do not apply then the academy (in consultation with the Trust if appropriate) will generally deal with this matter without involving the police or children's social care although this will be subject to review.

This decision is made where we are confident that we have sufficient information to assess and manage any risks within our pastoral support and disciplinary framework. The decision will be made by the academy DSL with the input of the principal, DALP DSL and others as appropriate and will be recorded.

Examples of cases where there is no need to involve the police are:

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the Academy to manage the incident directly.

In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care.

The following information will be considered when deciding on a course of action:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of the imagery?
- What is the impact on the children involved?
- Do the children involved have additional vulnerabilities?
- Does the child understand consent?
- Has the child taken part in this kind of activity before? Professional judgement will always be applied.

The images will not generally be viewed by staff unless there is a clear reason for doing so, reporting of the content is usually sufficient.

- We will NOT copy, print or share the image as this is illegal
- If viewing is done, it will be with another member of safeguarding staff or senior leadership

Once a decision has been made not to involve the police or CSC then images may be deleted but we will be clear that this is appropriate action.

Where it is necessary to involve the police and it is appropriate we are authorised to seize any device (Education Act 2011) and pass it to the police.

CSC will be involved where there are concerns which meet the threshold or if we know they are already involved with a child.

### **Advice and information for parents**

- The NSPCC has information and advice about sexting available on its website: NSPCC Sexting [www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting](http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting)
- The National Crime Agency/CEOP has produced a film resource for parents and carers to help them prevent their children coming to harm through sharing sexual imagery: THINKUKNOW Nude-selfies-a-parents-guide [www.thinkuknow.co.uk/parents/articles/Nude-selfies-a-parents-guide](http://www.thinkuknow.co.uk/parents/articles/Nude-selfies-a-parents-guide)
- Childnet have information and advice about sexting available on its website: [www.childnet.com/young-people/secondary/hot-topics/sexting](http://www.childnet.com/young-people/secondary/hot-topics/sexting)
- Parent Info (<http://parentinfo.org/>) provides information and advice to parents from expert organisations on topics ranging from sex and relationships, mental health and online safety including sexting. Further guidance on Online safety is found in Annex C of KCSIE 2018 – providing the link: [www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis](http://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis)

Resources parents could highlight to their children

- Childline have created Zip-It, an app that provides witty comebacks in order to help young people say no to requests for naked images Childline Zipit App
- There is information on the Childline website about sexting
- The Safer Internet Centre has produced resources called 'Childnet So you got naked online' helps children to handle incidents of sexting

The NSPCC adults' helpline: 0808 800 5002. The NSPCC has partnered with O2 to offer direct support to parents and other adults on issues relating to online safety.

Childline: [www.childline.org.uk](http://www.childline.org.uk). Childline offers direct support to children including issues relating to the sharing of sexual imagery.

The Professionals Online Safety Helpline (POSH): [www.saferinternet.org.uk/about/helpline](http://www.saferinternet.org.uk/about/helpline) Tel:

0844 381 4772. This helpline supports professionals with an online safety concern or an online safety concern for children in their care. Professionals are able to contact the helpline to resolve issues.

### **Resources for teaching staff**

There is a wealth of resources for teachers at page 28 of the UKCCIS Sexting in Academies Guidance 2016

<https://www.thinkuknow.co.uk/professionals/guidance/sexting-guidance-wales/>

**‘Honour-based violence’:** So-called ‘honour-based violence’ (HBV) 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 so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators: There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of academies and colleges) and pages 13-14 of the [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG\\_MULTI\\_AGE\\_NCY\\_PRACTICE\\_GUIDELINES\\_v1\\_180614\\_FINAL.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGE_NCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf)

FGM mandatory reporting duty: Female Genital Mutilation is a safeguarding issue; it is child abuse and a form of violence against girls. Local guidance for Academies is contained within Guidelines for all agencies including academies within the Lincolnshire and Nottinghamshire Safeguarding Children Boards procedure which have been informed by the government Multi-Agency Statutory Guidance 2016.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining children, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Information on when and how to make a report can be found at

[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

Teachers in DALP academies must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the academy and DALP DSL lead and involve children's social care as appropriate.

Trust staff should be alert to the following indicators:

- the family comes from a community that is known to practise FGM or is less integrated within the community.
- a child may talk about a long holiday to a country where the practice is prevalent.
- a child may talk about 'special female visitors' who are staying with the family, especially during the 'cutting season'.
- a child may confide that she is to have a 'special procedure' or to attend a special occasion.
- a child may request help, directly or indirectly, from a teacher or another adult.
- any female child born to a woman or has a sister who has been subjected to FGM must be considered to be potentially at risk, as must other female children in the extended family.
- a girl is withdrawn from PSHE/SRE without any specific reason being given.

In brief the signs that FGM may have occurred are:

- difficulty walking, sitting or standing.
- spending longer in the bathroom.
- urinary or menstrual problems.
- prolonged absence and then noticeable behaviour changes.
- reluctance to undergo normal medical examinations.
- may confide in a professional but may not be explicit or may be embarrassed.

Where it is suspected that a girl may have undergone or is likely to undergo FGM staff must share concerns with the academy DSL who in turn should consult the MASH and inform the DALP DSL.

Where staff suspect that FGM has occurred:

- be sensitive to the child, and family, be gender sensitive, make no assumptions, be non-judgemental, use simple language, record clearly.
- you have a duty to protect, safeguard and share information.
- refer to Children's Social Care for coordination of careful assessment (not necessarily with consent).
- there will be potential enquiries under Section 47.

- potential police enquiries.
- possible use of police protection or legal orders such as FGM PO, prohibitive steps but not necessarily the removal of the child.

Where staff know that FGM has taken place:

- the academy will report this direct to the police in accordance with the mandatory duty.

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Academies and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of Academies and colleges. The link can be found below. Trust and college staff can contact the Forced Marriage Unit if they need advice or information on 020 7008 0151 or via email at [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk). There is detailed guidance for staff which can be found at [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage).

### **Prevent Duty and Radicalisation**

The Prevent Duty came into force on 1 July 2015. The Prevent Duty is incorporated into our existing policies.

Across all DALP academies all staff are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. We will work with key partners to ensure that we are aware of any tensions within our local community and nationally and internationally, so that we can create safe spaces for our children to discuss their experiences and concerns. Where we are concerned about individual children there is a referral pathway which all staff will be familiar with. Initial advice and support can be obtained from the 'Tackling Emerging Threats to Children Team' and more serious concerns will be referred to the Police Prevent Team or the MASH where there is a concern that a child is at immediate risk.

The use of social media and the internet as tools to radicalise children cannot be underestimated. We recognise that those that seek to recruit children to follow extremist ideology often target those who are already vulnerable in some way and that exposure to extreme views can make children vulnerable to further manipulation and exploitation. We will therefore ensure that we build

children's critical thinking skills and resilience through both our curriculum and pastoral provision. Our curriculum promotes respect, tolerance and diversity. Children are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others.

There are a number of behaviours that might indicate that an individual is at risk of being radicalised or exposed to extreme views. Such behaviours may include:

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group
- day to day behaviour becomes increasingly centred on an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of materials or symbols associated with an extremist case
- attempts to introduce others to the group/cause
- communication with others that suggest identification with a group, cause or ideology
- using names/language ranging from insulting to derogatory for member of another group
- increases in prejudice-related incidents committed by that person – these may include
  - Physical or verbal assault
  - Provocative behaviour
  - Damage to property
  - Derogatory name calling
  - Possession of prejudice-related materials
  - Prejudice related ridicule or name calling
  - Inappropriate forms of address
  - Refusal to co-operate
  - Attempts to recruit to prejudice related organisations
  - Condoning or supporting violence towards others

PSHE provision is embedded across the curriculum and underpins the ethos of our academies. It is important to remind staff they have a duty to report any concerns, in the first instance, to the academy DSL.

Through INSET opportunities at our Trust and academies we will ensure that all staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation: are aware of the process of radicalisation and how this may be identified early on.

### **Children Missing Education**

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. We are aware that 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.

We recognise that a child going missing from education is a potential indicator of abuse or neglect.

When a child is absent from their Academy without authority we will follow our procedures for unauthorised absence and 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.

Each DALP academy has an admission register and an attendance register which supports the safeguarding children who may be at risk of missing education.

We will discuss and agree actions with regards to individual cases with the relevant colleagues in safeguarding/education within The Local Authority for children who are to be removed from the admission register where the pupil:

- has been taken out of school by their parents and the Academy has received written notification from the parent they are being educated outside the Academy system e.g. home education – this will be communicated with the home elective team
- does not arrive at the Academy as part of an admission process and we are not aware of their whereabouts
- has ceased to attend school and no longer lives within reasonable distance of the Academy at which they are registered and has been discussed with the children missing officer (CMO) in the local authority, as they have not been registered at a new Academy
- has been certified by the Academy medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she or his/her parent has indicated the intention to continue to attend the Academy after ceasing to be of compulsory school age
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the Academy at the end of that period or have been permanently excluded.

The actions that will be taken by the Academy are in the Guidance for Head Teachers and Business Managers where Children are at Risk of Missing Education

<https://www.gov.uk/government/publications/children-missing-education>



Where a child who fails to attend our Academies regularly, or has been absent without the Trust's permission for a continuous period of 10 school days or more we will follow The Local Authority's Guidance for Head Teachers and Business Managers where Children are at Risk of Missing Education

[www.nottinghamshire.gov.uk/media/113023/school-attendance-flow-chart-april-2016.pdf](http://www.nottinghamshire.gov.uk/media/113023/school-attendance-flow-chart-april-2016.pdf)

## **Absence**

Children can register in the morning and then go missing throughout the day without a satisfactory explanation. If a child is 'missing', their whereabouts cannot be established within the Academy; Academies will need to identify whether the child is at significant risk.

Children are more vulnerable who:

- are on a plan (child protection plan, child in need plan, looked after child, early help)
- have specialist educational needs and or a disability
- are using substances
- have an education health care plan (EHCP)
- there are indications that the child is at risk of CSE, grooming or radicalisation

There may be other contributing factors that should be taken into consideration when determining if the child is at significant risk such as the child's emotional health, known issues at home etc.

Academy staff will always try to locate the child and attempt to establish the whereabouts of the child. Once a child has been identified as missing and cannot be located within the academy, the academy designated safeguarding lead will be informed.

Staff will use their professional judgement and risk assess the urgency of the situation to help inform the timeframe required in establishing the child's whereabouts before notifying the police. Parents/carers will always be informed before contact with the police is made, unless a child is at immediate risk of harm and a police response is needed. This will be judged on a case by case basis.

When a decision has been made to contact the police, the police will require information from the Academy to assist in locating the child and returning them to a safe environment.

If a child has a social worker or case manager (e.g. early help) then they should also be informed. Where a child is known to regularly go missing, a risk assessment for the child will be undertaken.

For further guidance please see the missing protocol or speak to the Local Authority's Children's Missing Officer. Missing. [CME@nottscgcsx.gov.uk](mailto:CME@nottscgcsx.gov.uk) / 0115 8041045.

## **Private Fostering**

Academies play an essential role in identifying privately fostered children. Although most children in private fostering situations are likely to be safe, in some private fostering arrangements there are clear safeguarding issues and children effectively have no one who is concerned for their safety or welfare.

What is a private fostering arrangement?

A private foster carer is someone other than a parent or a close relative who cares for a child for a period of 28 days or more, in agreement with the child's parent.

It applies only to children under 16 years, or under 18 if they are disabled. A private fostering arrangement is not when a child is Looked After by the Local Authority or placed in any residential home, hospital or Academy.

Private foster carers can be part of the child's wider family, a friend of the family, the parents of the child's boyfriend or girlfriend or someone unknown but willing to foster the child. A cousin, great aunt or a cohabitee of a mother or father would therefore be a private foster carer.

Close relatives - a grandparent, a brother or sister, an aunt or an uncle, a step parent - are not private foster carers.

Who may be privately fostered?

This list is by no means exhaustive and indicates the scale and variety of situations and agencies these arrangements can cover:

- children whose parents are unable to care for them, for example if they have chronic ill health or are in prison.
- children sent to this country, for education or health care, by parents who live overseas.
- a child living with a friend's family because they don't get on with their own family.
- children living with a friend's family because of their parents' study or work.
- children staying with another family because their parents have separated or divorced.
- teenagers living with the family of a boyfriend or girlfriend.
- children from abroad who attend a language school or mainstream school in the county and are staying with host families.
- children at boarding schools who do not return to their parents in the holidays but stay with 'host families' recruited by 'education guardians'.
- unaccompanied asylum seeking minors who are living with friends, relatives or strangers.

Children who are trafficked into the UK are especially vulnerable and are often living in de-facto private fostering arrangements. Child trafficking is the movement of children for exploitation, including domestic servitude, commercial sexual exploitation and to support benefit claims (see

[www.ecpat.org.uk](http://www.ecpat.org.uk) for further information). Where trafficking is suspected, a safeguarding referral should be made to either Lincolnshire or Nottinghamshire MASH.

#### What to do if you are aware of a private fostering arrangement

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. However, parents and carers often do not tell professionals or agencies about such arrangements; they may not be aware that they need to (and this may apply particularly to new communities in the UK such as migrant families from new-EU states), or they chose not to tell agencies about these arrangements.

Children's Services are not involved in making private fostering arrangements but are responsible for checking that the arrangements are suitable for the child. As a professional it is important for you to notify Children's Services if you are in contact with a child or young person who is being privately fostered. This will help protect the child against abuse or neglect and provide some reassurance that the child is being looked after properly.

#### Signs to watch out for:

- has someone else started collecting a child from school on a regular basis?
- has a child mentioned to you that they are staying with someone else or that their parent(s) have gone away for a long time?
- is there something unusual or unclear in the child's administration file? This may include copies of passports, visas and other immigration related documents which are unclear or do not clearly show that the child has rights of residence in the UK, or that it is unclear who has parental responsibility for the child.

#### What the Trust will do:

- ensure that all staff are aware of the definition of private fostering and the Local Authority's responsibilities when such arrangements occur.
- look at admission files to check on the home situation, and make a note to follow up any circumstances which are not clear.
- whenever staff become aware of private fostering arrangements they should notify the DSL.
- the SDP or another appropriate member of staff should speak to the families of children who might be involved in private fostering and check that they are aware of their duty to notify the Local Authority of the arrangement. Trust staff should actively encourage the parents and/or carer to notify Children's Services of the arrangement.

If you believe that a private fostering arrangement has not been reported to either Lincolnshire or Nottinghamshire Social Care you should contact them directly:

Lincolnshire County Council 01522 782111

[www.lincolnshire.gov.uk/childcare-and-family-support/adoption-and-fostering/private-fostering/](http://www.lincolnshire.gov.uk/childcare-and-family-support/adoption-and-fostering/private-fostering/)

Email [fosteringandadoptionenquiries@lincolnshire.gov.uk](mailto:fosteringandadoptionenquiries@lincolnshire.gov.uk)

Nottinghamshire Multi Agency Safeguarding Hub 0300 500 80 90 [Mon-Thurs: 08.30am -5pm, Fri: 08.30-14]

Emergency Duty out of hours Team 0300 456 4546

If you suspect that a child who is living in a private fostering arrangement is being harmed or is at risk of significant harm (including suspecting that a child may be trafficked) and urgent action is required, follow your Child Protection procedures as laid out in this Policy.

What happens after the Local Authority is notified?

When the Local Authority receives notification about a private fostering arrangement, Lincolnshire CC or the Nottinghamshire MASH Team will arrange for an officer to visit the child within seven working days. They will contact the parent or person with parental responsibility, run checks on the carer and talk to the young person. This will be to ensure the young person is happy, safe and thriving in the arrangement and that they are able to access education, medical care and any other services they may need. The Local Authority will also check that the accommodation is safe and suitable and enable the carer to access suitable training if required. Providing everything is in order, the family will continue the arrangement with the social worker providing checks at regular intervals to ensure the young person is safe, happy and has access to all the services to meet their needs.

Further Guidance and Resources:

- [www.privatefostering.org.uk](http://www.privatefostering.org.uk)
- 'Child Trafficking and Private Fostering', ECPAT UK  
[www.ecpat.org.uk/News/dfc-training-for-foster-carers](http://www.ecpat.org.uk/News/dfc-training-for-foster-carers)
- Online Safety – the Trust has a separate E-Safety Policy which can be viewed  
[www.dalp.org.uk/about-us/policies](http://www.dalp.org.uk/about-us/policies)
- Bullying may also have safeguarding implications – this is discussed in the Trust Climate For Learning Policy [www.dalp.org.uk/about-us/policies](http://www.dalp.org.uk/about-us/policies)
- Teenage pregnancy is also a Safeguarding concern and will be dealt with by the DSL/ Deputy DSL.

## **11b. Signs of abuse**

The following signs and types of behaviour may indicate that a child is being abused or that there is something wrong.

In themselves they are not evidence of abuse, but they may suggest a concern, particularly if a child exhibits several of them or if a pattern emerges of when or how a pupil exhibits signs or behaviour.

Some of the following signs might be indicators of abuse or neglect:

- children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed
- children with clothes which are ill-fitting and/or dirty
- children with consistently poor hygiene
- children who make strong efforts to avoid specific family members or friends, without an obvious reason
- children who don't want to change clothes in front of others or participate in physical activities
- children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- children who talk about being left home alone, with inappropriate carers or with strangers
- children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason
- children who are regularly missing from school or education
- children who are reluctant to go home after school
- children with poor school attendance and punctuality, or who are consistently late being picked up
- parents who are dismissive and non-responsive to practitioners' concerns
- parents who collect their children from school when drunk, or under the influence of drugs
- children who drink alcohol regularly from an early age
- children who are concerned for younger siblings without explaining why
- children who talk about running away
- children who shy away from being touched or flinch at sudden movements

A child may choose to talk to a member of staff about a Safeguarding issue. This is called a DISCLOSURE (see section 5).

A child should not be prompted to disclose information, even if he/she appears to exhibit a number of concerns. If a disclosure is made, the member of staff should follow the guidelines given. One of the Academy Safeguarding Officers (or a member of the Leadership Team in their absence) should be informed as a matter of urgency.

## **12 Responding to a disclosure**

A 'disclosure' is when a child confides information which is of a sensitive nature and which gives you cause to be particularly concerned e.g. being hit at home, a sexual assault, unfed, medical needs not attended to, and inappropriate punishments by parents, continual verbal abuse and pregnancy.

A child may approach any member of staff on their own, with a friend, or on behalf of a friend. It is important to speak to the pupil concerned alone.

This may be at the end of a lesson, at the end of the day/week, in a quiet moment when the child is alone, at break/ lunchtime or occasionally during a lesson, perhaps if there is a discussion about a pertinent topic. If this happens, divert away from any potentially difficult discussion in front of other children, finish the lesson (or get support) and then speak to the child.

If you know there is a child with an injury about which you are suspicious, report this to the DSL immediately. After further investigation it may be that a Social Care worker will want to see the injury and if necessary photograph it as evidence. This has to be done at the earliest opportunity.

### **What to do in a DALP Academy:**

All staff (with a work email account) have been assigned with a log in for My Concern where a disclosure should be completed every time a safeguarding concern is raised.

When speaking directly with a pupil making a disclosure, it should be recorded in hard copy in the first instance.

Always believe the pupil and take the matter seriously, even if what you hear sounds unlikely. It may have taken time and courage to speak to an adult. If it is found to be not entirely true, the pupil still needs help and support.

Speak to the child in a quiet place straight away. You will need to ask for emergency cover from your duties. If you explain that it is a Safeguarding issue, this will be done immediately. Contact your Line Manager, House Reception or the main office. Request support from the DSL/DDSL or Leadership Team. Use the nearest office/quiet space, preferably with a telephone and the Academy Safeguarding Incident Report Form. This disclosure will be reported up to the DSL and may be logged in My Concern.

Stay calm. Reassure the child. Do not show that you are shocked or upset.

Listen carefully and make notes. Only prompt the child by asking open questions e.g. What happened after that? What did he do then? How did that make you feel? Write notes using the pupil's own words/descriptions. Do not put words in the child's mouth and avoid leading questions/extensive questioning

Take as much time as the child needs. Expect and respect silences.

Reassure the child that they have done the right thing by telling you. Helpful phrases are: 'It's not your fault. I am sorry this has happened to you. I am glad that you have told me. I will make sure that you get help.'

Make sure the child understands that you will have to tell someone else in order to help them. This will only be on a 'need to know' basis; it will be confidential to as few people as possible.

Contact the DSL (or DDSL) if not done so already.

- Stay with the child until support arrives. What not to do:
  - Do not delay speaking to the child.
  - Do not promise to keep secrets. 'Confidential' = 'need to know' basis.
  - Do not ask leading questions e.g. did she hit you? Were you afraid?
  - Do not use your own interpretation of events when making notes.
  - Do not investigate further yourself

Children can sometimes be worried that telling someone will result in them being taken away from their family. You can reassure them that this only happens in a very few very serious cases, so it is not something to worry about.

Children can also be concerned about parents or other adults involved getting to know. You can truthfully say that you will not be doing this, but that someone else may have to in order to help them. You have to be truthful about this, even if the child then says they will not tell you anything else. Investigations can still be made; help can still be given.

The role of the DSL can be explained to the child.

### **Afterwards**

Arrange to speak to the DSL about what happened. It can be upsetting and traumatic. You may want to talk about what you (and the child) said. You may be troubled about the issues raised. You need to know what will be done to help the child.

### **Legal responsibility**

In the exceptional case of a Safeguarding issue going to Court, the need for all staff involved to make and keep accurate notes in My Concern is particularly pertinent. Any member of staff may be required to testify under oath.

### **Records and monitoring**

*Any observational concerns about a child must be recorded in My Concern within 24 hours, and clearly in some cases that raise a concern around imminent or present danger to the child, these*

must be disclosed as soon as possible to the DSL. All records will provide a factual and evidence based account and there will be accurate recording of any actions.

Safeguarding, child protection and welfare concerns will be recorded and kept in My Concern, which will be securely stored and away from the main pupil file. The main pupil file should have a red C in the top right hand corner to denote a separate file exists.

A 'confidential' file will be commenced in the event of:

- a referral to MASH/Children's Social Care.
- any child open to social care.
- any other concerns on the child's main academy file.

### **13 Staff and child confidentiality in DALP academies**

Working successfully with children involves getting to know them and establishing a positive relationship. Children will ask questions about adults' lives. This is natural curiosity and perfectly acceptable within certain professional boundaries. A Personal Tutor will expect to develop strong and close relationships with children, especially if they stay with the child throughout their time at the Academy. Without stifling the opportunity to build relationships with children, there are nevertheless some important guidelines to follow.

#### **DO:**

- share concerns about the child's behaviour with other key staff
- decide what aspects of your life you are prepared to share
- have a strategy for withholding information without causing offence
- take care of personal items e.g. mobile phone, contacts page of diary
- follow the Academy guidelines for taking photographs
- use language appropriate for the professional setting at all times
- use de-escalation techniques to avoid unnecessary confrontations
- dress in a modest and professional way; avoid revealing clothing
- meet children for individual lessons in open areas with other staff nearby
- maintain a professional pupil/staff relationship (including with Post 16 children)

Also: Check your car insurance before agreeing to transport children. Consult with your academy DSL before undertaking. You should only take a child accompanied by another responsible adult. Children should sit in the back whenever possible. A single child should always sit in the back.

#### **DON'T:**



- communicate with children via personal mobile phone/text message
- communicate with children via personal email, MSN, BBM, Facebook etc.
- invite children to be 'friends' on Facebook
- give your home address or telephone number to children
- take unnecessary or inappropriate photographs
- use language which could be interpreted as racist, sexist, flirty, sarcastic
- prevent a child from leaving a room if they are determined to do so
- invade a child's 'personal space'

If a child makes an allegation against you or behaves inappropriately, report it immediately to a member of the Academy Leadership Team, write an account, date and sign it.

An investigation will be supported by the Principal and the DSL according to the guidance handbook with advice from the Local Authority Designated Officer (LADO).

The Trust's (DAT and NCEAT), Governors or Local Authority Safeguarding Board will not be able to support a member of staff who behaves with indiscretion, whose activities are posted on a social networking site or who breaches the child/staff relationship.

### **Child confidentiality**

We recognise that all matters relating to child protection are confidential; however, a member of staff must never guarantee confidentiality to children; children will not be given promises that any information about an allegation will not be shared.

Where there is a child protection concern it will be passed immediately to the designated safeguarding lead and/or to children's social care. When a child is in immediate danger children's social care/the police will be contacted.

The principal or designated safeguarding lead will disclose personal information about a pupil to other members of staff, including the level of involvement of DALP and other agencies, only on a 'need to know' basis.

All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children. They are aware that the General Data Protection Regulations (2018) should not be a barrier to sharing of information where failure to do so would result in a child being placed at risk of harm.

## 14 Allegations against members of staff

DALP Academies follow the guidelines that are firmly established in section four of KCSIE (2018). General guidance for whistleblowing can also be found on the Government website at

[www.gov.uk/whistleblowing/what-is-a-whistleblower](http://www.gov.uk/whistleblowing/what-is-a-whistleblower)

DALP has very clear guidance on the correct protocol / hierarchy of reporting such a disclosure based on the need for confidentiality. This is set out in the appendix.

Staff are encouraged to raise concerns in which it is alleged that a teacher or member of staff (including volunteers) has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

The DALP protocol for staff to follow when making a disclosure against a DALP employee is outlined in the appendix.

Should a member of DALP staff find themselves in a situation whereby an allegation of abuse has been made against them, they should contact the CEO (if at DALP) and the Senior Executive Leader / Principal. Do not discuss the allegation with other staff or approach the child. The CEO / Senior Executive Leader / Principal will consult the document: 'Staff facing an allegation of abuse. Guidelines on practice and procedure' and will contact the Local Authority Safeguarding Officer.

Allegations against the CEO - These should be referred to the Chair of the DALP LAB. Please note the LADO Team number (as outlined on page 4) 0115 8041272.

Concerns raised by parents - These should be initially directed to the academy DSL, Principal or Senior Executive Leader.

Staff should not feel that awareness of these potentially serious issues detracts from developing positive relationships with children or spoils the enjoyment that is derived from the challenge and pleasure of working with them. Both incidents of abuse and allegations against staff are rare. Staff should feel confident in the knowledge that they know the correct procedure and how the Trust will support them if they are involved in a Safeguarding issue.

The NSPCC also has a dedicated 'whistleblowing' helpline 0800 02802825. Staff may raise any concerns through this facility **as a last resort, should they not feel comfortable with any part of the protocol laid out in the appendix.**

### Safe Staff and Supporting Staff

- Safer recruitment processes will be followed in accordance with NCC HR Guidance found on the Academies portal and from DfE Keeping Children Safe in Education 2018
- Checks and references are an essential part of this process
- Staff will have access to advice on the boundaries of appropriate behaviour and will be aware of our code of conduct. This includes contact between staff and children outside the work context
- In the event of any complaint or allegation against a member of the DALP central team, the CEO (or the designated safeguarding lead) if the CEO is not present, will be notified immediately. If it relates to the CEO, the chair of trustees will be informed without delay. We will respond to all allegations robustly in collaboration with the Local Authority Designated Officer (LADO) and HR colleagues
- Staff may find some of the issues relating to child protection upsetting and may need support which should be provided by the Trust and their Human Resources Team. Advice and support will be made available by the LADO and NCC HR where appropriate to the leadership team

This policy complements and supports a range of other policies, all of which can be found on the DALP website.

These include:

- Attendance Policy
- Behaviour Principles statement
- Special Educational Needs & Disabilities Policy
- Sex and Relationships Education Policy
- Single Equality Policy

In addition to these DALP over-arching Policies, individual academies have protocols or policies on, for example, Safer Internet Use / use of technology / e-safety, behaviour and physical handling which may inform the Safeguarding policy.

## **15 Review of the policy**

A full review of this policy will be conducted in Summer term 2019.

## **16 Appendices to policy - September 2018**

### **16.1 Visiting speakers:**

DALP now require all academies to have the following, regarding visiting speakers, included as an annex to the Trust Safeguarding Policy.

- a formal invitation procedure, to include a clear outline by the speaker of their presentation in advance, and approval by the Principal
- appropriate suitability and background checks on the speaker and any organisation they represent, including an internet search
- a formal agreement signed by the speaker outlining the academy's commitment to equality and British Values. This should also make clear that a presentation will be brought to an early end if the content proves unsuitable
- an understanding that staff will be present during the visit including a member of the senior leadership team who will monitor the speech to ensure it aligns with the values and ethos of the school and British values
- an understanding there will be no attempt to raise funds without the prior written permission of the Principal

### **16.2 In addition, it is recommended:**

- all information about the visiting speaker and booking process is recorded on a suitable proforma
- DALP academies complete an evaluation form after the presentation, with an opportunity for feedback from staff and noting any contentious subject areas or comments. This will assist when making decisions about whether to invite the speaker back for future events.

It is advisable to request the speaker provides a biography of themselves prior to visiting the academy

### **16.3 Peer message in academies**

16.3.1 Peer Massage involving adults to children and pupil to pupil is prohibited in DALP academies. The only exception to this policy should relate only to those children where it is part of their EHCP – for example in special schools.

16.3.2 For those academies where massage is part of a child's EHCP, staff must gain accreditation to carry out the practice and carry it out in accordance with the plan.

### **16.4 County Lines**

16.4.1 New information in KCSIE Annex A has been added around child criminal exploitation; Children being used to carry drugs or money from urban to rural areas.

16.4.2 DSL's and staff should be aware of this new information.

'Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.'

## **16.5 Modern slavery**

16.5.1 [www.gov.uk/government/publications/how-to-report-modern-slavery/how-to-report-modern-slavery](http://www.gov.uk/government/publications/how-to-report-modern-slavery/how-to-report-modern-slavery)

16.5.2 Modern slavery is a serious crime. It encompasses slavery, servitude, and forced or compulsory labour and human trafficking. Modern slavery victims can often face more than one type of abuse and slavery, for example if they are sold to another trafficker and then forced into another form of exploitation.

A person is trafficked if they are brought to (or moved around) a country by others who threaten, frighten, hurt and force them to do work or other things they don't want to do.

## **16.6 Peer-on-Peer abuse**

16.6.1 [www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges](http://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges)

16.6.2 [www.farrer.co.uk/Global/Peer-on-peer%20abuse%20toolkit%202014.pdf](http://www.farrer.co.uk/Global/Peer-on-peer%20abuse%20toolkit%202014.pdf)

16.6.3 What do we mean by sexual violence and sexual harassment between children?

1. 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.

2. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

3. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

## **Formal Procedure in reporting a safeguarding / child protection breach involving DALP employees**

This protocol falls outside of both the DALP Whistleblowing and Staff Disciplinary Policy, (where allegations against staff are not of a child protection / safeguarding nature) - it is intended to be used as an appendix to the Safeguarding and Child Protection Policy.

### **1. Action to be taken by the individual**

1.1 If an individual knows or suspects that some wrongdoing has occurred / is occurring regarding the safeguarding of children in or outside of the academy, he or she should raise the matter immediately with the Designated Safeguarding Lead (or Deputy Designated Safeguarding Lead *if the former is unavailable*) as outlined below.

If the individual is unsure who to raise the concern with then they should contact the Trust DSL.

### **2. The protocol**

2.1 As the first step, you should raise the concern with an appropriate designated person, which would normally be the Designated Safeguarding Lead, who would then take / escalate appropriate action.

There are three exceptions to this course of action;

2.1.1 If you believe that the Designated Safeguarding Lead is involved in the concern, then the Principal should be approached when making the initial disclosure, who would then take / escalate appropriate action.

2.1.2 If you believe that the Principal is involved in the concern, then the Senior Executive Leader should be approached when making the initial disclosure, who would then take / escalate appropriate action.

2.1.3 If you believe that the Senior Executive Leader is involved in the concern, then the DALP CEO should be approached when making the initial disclosure, who would then take / escalate appropriate action.

2.2 If the safeguarding disclosure is such that you do not feel able to raise it with someone connected to the academy, then you would need to raise it with the Trust DSL in the first instance. This may be referred on to the LADO on the advice of the Trust DSL.

2.3 Safeguarding Concerns against a member of DALP academy staff may be raised verbally or in writing, but it is preferable for an allegation to be set out in writing to the correct person in the reporting hierarchy (as set out above). A disclosure may also be made by phone, again to the correct person named in the above reporting hierarchy. It is important, however, that when the concern is raised, you make it clear that the issue is being raised under the Safeguarding policy and why you feel this is in the public interest.

2.4 You will be asked to provide as much information as you can to the person who you contact, so that they can be satisfied that there are sufficient grounds for concern.

2.5 If you wish to raise the safeguarding concern confidentially, this must be made clear to the designated person who is initially contacted.

2.6 If you have raised the issue verbally then you may be asked to put your safeguarding concerns into writing at a later stage.

2.7 You may not know how or when the matter has been investigated or a conclusion reached. The confidentiality is likely to remain with the Designated Safeguarding Lead and / or academy / Trust leadership team.

2.8 The Designated Safeguarding Lead and / or the academy leadership team will also notify the person who is the subject of the disclosure of the concern. Upon receipt of the information, this individual will be able to respond to the concern(s) raised.

### **3 Additional guidance**

3.1 There are circumstances under which maintaining complete confidentiality may be difficult for the Designated Safeguarding Lead(s) / academy leadership to maintain. For example:

3.1.1 If the safeguarding matter leads to a legal procedure and evidence is required by the court.

3.1.2 If the safeguarding matter raised comes within the remit of another incident and the staff member who originally disclosed the concern is asked to provide a signed statement as part of the evidence, thus revealing their identity.

#### **4. Procedure – Alerting outside bodies**

4.1 An individual should always, in this first instance, look to initially defer to an appropriate designated person in the organisation about any potential safeguarding breach, as outlined above.

4.2 If the individual is not satisfied with the response given, they are entitled to contact a relevant external body to express the concerns – in the case of safeguarding disclosures, this would be the LADO.

4.3 In doing this the individual should;

4.3.1 Have a reasonable belief that the safeguarding disclosure is based on correct facts

4.3.2 Have a reasonable belief it is in the public interest to make the disclosure

4.4 If there is evidence of criminal activity then the Designated investigating officer should inform the police. The Academy and / or Trust will ensure that any internal investigation does not hinder a formal police investigation.