

# Safeguarding and Child Protection Policy

## Document Control

Date	Revision amendment details	By whom
1/9/22	V1 live document – approved by trustees 14 <sup>th</sup> July 2022	Trust Board

**Due to the evolving nature of DEMAT, local procedures behind this Policy will be reviewed and amended accordingly to reflect changes.**

This policy will be reviewed annually

This policy does not form part of any employee's contract of employment and it may be amended at any time following consultation.

*Love*  
*Community*  
*Respect*  
*Trust*

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## Related policies and legislation

- Keeping Children Safe In Education, (KCSIE) September 2022
- Working Together to Safeguard Children, July 2018
- Guidance for Safer Working Practices 2022
- What to do if you are worried a child is being abused - Advice for practitioners, March 2015
- When to Call the Police, Guidance for Academies and Colleges - NPCC, 2020
- Teaching Online Safety in Academy - DfE June 2019 to be read in conjunction with: Education for a Connected World Framework - UKCIS, 2018
- Relationships, sex and health education, guides for Academies DfE, June 2019
- How academies should support the spiritual, moral, social and cultural (SMSC) development of pupils, November 2014.
- Preventing extremism in the education and children's services sectors, September 2015.
- Prevent Duty Guidance July 2015
- Sexual violence and sexual harassment between children in Academies and colleges, May 2018
- The Prevent duty, June 2015
- The use of social media for online radicalisation, July 2015
- Use of Reasonable Force in Academies, July 2015
- Reducing the need for restraint and restrictive intervention - HMGovt., June 2019
- Trust related policies including: Whistleblowing, Allegations Against A Staff Member IT and Internet Acceptable Use and Online Safety
- Academy Inspection Handbook, Updated 2022
- Inspecting Safeguarding in Early Years, Education and Skills, August 2021
- 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, December 2020)
- Children Act 1989 and Children Act 2004, section 11
- Education Act, section 175
- Sexual Offences Act 2003

## Definitions

- Where the word 'Trust' is used in this document it refers to The Diocese of Ely Multi-Academy Trust, the responsible body.
- Where the word 'Headteacher' is used it refers to the Academy leader of an individual Academy and/or federated Academy or Executive Headteacher within the Trust.
- Where appropriate an individual Academy will make available details of the locally owned procedures and practices to support the implementation of Trust policies.
- Where the title Chair of the Board of Trustees is used it refers to the Chair of the Trust
- Where the abbreviation CEO is used it refers to The Chief Executive Officer of the Trust
- Where Designated Safeguarding Lead (DSL) is used, it also refers to Deputy Designated Safeguarding Lead (DDSL) in the absence of the DSL
- Where the Trust Designated Safeguarding Lead (DSL) is used, it refers to the named person in the Trust Safeguarding and Child Protection Policy, September 2022 or their deputy.

## Policy Statement

The Diocese of Ely Multi Academy Trust's vision is for every child to flourish, to be introduced to the richness of human experience, and to understand, question, and contribute to the world around them. Children are at the heart of all we do at DEMAT, and we focus on making the best decisions for all the young people in our care. We have a great responsibility for the quality of their education, and we cannot leave this to chance. We are guided by our core values of Love, Community, Respect, Trust, and Ambition and these are demonstrated throughout, sitting comfortably alongside the values specific to each individual Academy.

Our academies share many common features; as part of the DEMAT family our Headteachers recognise that working together can be far greater than working alone. We have common approaches to the way in which we do things across the Trust but also realise that academies need the flexibility to respond to their own contextual needs.

Children who are abused or witness abuse may find it difficult to develop a sense of self-worth or view the world in a positive way. For such children, the Academy that they attend may be one of the few stable, secure and predictable components in their life. Other children may be vulnerable because they have a disability, or they are in care. We seek to provide all our children with the necessary support to keep them safe and build their self-esteem and self-confidence.

We want children at all our Academies to feel able to talk freely to any member of staff or regular visitor if they are worried or concerned about something.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff across our Trust and at our Academies play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child.

## Aims & Purpose

The purpose of the Diocese of Ely Multi-Academy Trust's Safeguarding policy is to ensure every child who is a registered pupil at each of our Academies is safe and protected from harm.

This policy sets out the aims, purpose and ethos of safeguarding across our Trust, and the roles & responsibilities of the Trust & those of our Academies.

Each Academy within our Trust will adopt this policy, and outline Academy specific details and procedures, giving clear direction to staff, volunteers, visitors and parents about expected behaviour and the legal responsibility to safeguard and promote the welfare of all children at their Academy.

The objectives of the policy are to:

- Ensure that all Trust staff are fully acquainted with the legal framework for safeguarding and child protection
- Provide a framework for academies to develop and implement their safeguarding and child protection procedures in accordance with this policy
- Ensure that there are effective procedures in place to deal with safeguarding and child protection issues which arise

- Assist staff to work safely and responsibly and to monitor their own standards and practices
- To set out responsibilities of various stakeholders
- Support the Trust's overall aim to create and maintain a safe learning environment where all children and adults feel safe and valued and know they will be listened to and taken seriously

This policy should be read alongside:

- Statutory guidance Working Together to Safeguard Children;
- Keeping Children Safe in Education (2022)
- DfE advice - What to do if you are Worried a Child is Being Abused - Advice for Practitioners

## Roles & Responsibilities

Safeguarding vigilance and promoting the welfare of children is everyone's responsibility. Everyone who works with children and their families must consider, at all times, what is in the best interests of the child.

Every employee, Trustee and local governor of the Academy as well as every volunteer who assists the Academy is under a general legal duty:

- To protect children from abuse and neglect
- To be aware of the Academy's child protection procedures and to follow them
- To know how to access and implement the Academy's child protection procedures, independently if necessary
- To keep a sufficient record of any significant complaint, conversation or event in accordance with this policy
- To report any matters of concern to the Academy's DSL.
- Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010 22, (including the Public Sector Equality Duty<sup>23</sup>), and their local multi-agency safeguarding arrangements.

Keeping Children Safe in Education 2022, sets out the expectations and scope of other roles within the Academy and Trust.

Each Academy will have one 'DSL' who is operationally responsible for leading on safeguarding in Academy, particularly around child protection. This role may be a senior leader, or in large Academies, may be an 'out of class' member of support staff. Each headteacher will none-the-less also have undertaken DSL training and refreshers, and will ultimately be responsible for safeguarding, in Academy, regardless of designation of DSL or DDSL.

Academies may also have other DDSLs, the number dependent on size of Academy, who will contribute to the management of safeguarding; however, the division of responsibilities will have been clarified in Academy and roles set out in the DEMAT job descriptions for DSLs and DDSLs.

The Trust has appointed DSL to undertake the necessary duties to support and develop effective safeguarding practice across all Trust Academies. Each Academy has appointed a DSL, who is a member of staff with the necessary status and authority to be responsible for matters relating to safeguarding, child protection and welfare.

The DSL's name and contact details are recorded in Appendix One of this policy. These details are updated throughout the year, if any changes to staffing occur.

The main responsibilities of the DSL are set out below and are in line with guidance taken from Annex C, Keeping Children Safe in Education 2022.

If the DSL is unavailable the DDSL will carry out their duties. The DDSL name and contact details are also contained in Appendix One.

Whilst all Trust Headteachers have the appropriate DSL training, the day-to-day safeguarding operations maybe delegated to the DSL, and in turn DDSL if the DSL is not available. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

The headteacher, supported by the governing body, has overall responsibility for ensuring all aspects of child protection and safeguarding are paramount in the organisation. This duty cannot be delegated. The headteacher should ensure regular supervision meetings (see Safeguarding Supervision policy) take place so that they are kept up to date with all matters, and also to formally check the welfare of all Academy safeguarding team members.

Either the DSL or DDSL must be available to staff and pupils during the Academy day, either directly or by telephone. If the DSL is 'off-site', this must be communicated to all staff. If both the DSL and Deputy DSL are not available, staff should share concerns with another member of the senior leadership team who should contact the Trust DSL immediately should further advice/support be needed (see Appendix One for contact details).

The DSL and the DDSL(s) must have undertaken appropriate child protection training and training in inter-agency working, to provide them with the knowledge and skills required to carry out the role, and must attend full refresher training at two-yearly intervals (minimum), attend additional safeguarding training on key issues, and attend updates and briefings at least annually.

The DSL (as a minimum) should also have undertaken Prevent training and Online Safety training, and be able to support the Academy with regards to their requirement under the Prevent Duty.

### **The DSL is responsible for:**

- Ensuring their DSL statutory training is up-to-date every two years by a recognised provider and their knowledge and skills are refreshed at regular intervals relating to safeguarding issues such as county lines, FGM, online safety etc.
- Ensuring staff receive regular safeguarding and child protection updates as required, but at least termly, to provide them with relevant skills and knowledge to safeguard children effectively.
- Acting as the first point of contact for concerns and advice relating to keeping children safe.
- Preparing and publishing Academy referral procedures for reporting and dealing with safeguarding and child protection issues in line with this policy.
- Ensuring that all cases of suspected child abuse or safeguarding issues are investigated and dealt with in line with policy.
- Ensure all concerns are referred to local multi agency safeguarding contacts and these are recorded appropriately including response and potential challenge of decisions made.
- Ensuring that all staff have read and are familiar with statutory guidance, particularly Keeping Children Safe in Education, 2022 part one, maintain a list of staff who have signed to confirm they have read it and understand their role and responsibilities as set out in part one.
- Ensuring that staff have an understanding of child abuse and its main indicators, as well as broader safeguarding issues.

- Ensuring that all staff dealing with child protection and safeguarding incidents have suitable support to maintain their own wellbeing.
- Advising staff and volunteers on Academy referral procedures and their own safeguarding and child protection responsibilities.
- Ensuring all new staff have a full safeguarding induction prior to the commencement of their role.
- Ensuring that effective communication and liaison takes place between the Academy and the Designated Officer for the local authority and Safeguarding Partnerships and any other relevant agencies.
- Ensuring that correct and confidential reporting and recording systems are in place and child protection records are transferred appropriately to new establishments in line with guidance.
- Being aware of pupils who have additional vulnerabilities such as: those children who have a social worker, are looked after or previously looked after or have SEND.
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and Academy and leaders.
- Consulting with the Headteacher on the provision of an appropriate training programme for staff, and for logging staff attendance and dates.
- Being aware of the latest national, Trust and local guidance and requirements and keeping the Headteacher and staff informed as appropriate.
- Supporting the completion of the Trust Safeguarding Self-audit annually and for taking part in peer-to-peer safeguarding audits across the Trust and between Trusts where appropriate.
- Ensuring all staff use CPOMS recording system appropriately and information is regularly monitored daily for alerts, patterns, and timely intervention.
- Ensuring responses to concerns raised by online monitoring are in line with this policy.

### **The Headteacher is responsible for:**

- Ensuring there is a DSL who is a member of the Academy's leadership team, unless, in larger Academies, the role is delegated to a member of staff who is employed specifically for the role. In this circumstance, there will be a clear reporting route between DSL and SLT.
- Ensuring there are mechanisms in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of KCSIE 2022
- Maintaining Designated Safeguard Lead (DSL) training themselves; the DSLs must have appropriate DSL training at least every 2 years by a recognised provider including: safer recruitment, preventing terrorism, specific issues such as FGM and CSE, online safety and SEND training
- Ensuring all adults (including supply staff, visitors and volunteers) have an understanding of Trust and Academy policies and procedures relating to the safety and wellbeing of children including guidance listed in 'Related documents and policies' above
- Ensuring all staff and volunteers know further guidance relating to raising concerns can be found in the Trust Whistleblowing Policy
- Ensuring there is appropriate induction and training for all staff for safeguarding to ensure all staff have the knowledge, skills and understanding to keep children safe including vulnerable pupils, such as those previously looked after and SEND, including appropriate mental health and wellbeing training
- Ensuring safer recruitment practices are adhered to and monitored regularly when appointing new staff, volunteers, and authorising visitors to the Academy
- Checking that once staff have been appointed (or volunteers vetted) the Academy enters details onto the Academy's SCR immediately to ensure that the SCR is up to date using the Trust SCR template and ensuring compliance with statutory guidance.
- Ensuring the Academy has a minimum of two named staff members trained as DSLs for Child Protection in addition to the Headteacher, with one as a named 'Lead DSL', one as a named 'Deputy DSL', a lead should be identified for looked after and previously looked after children,

a Prevent Lead and an Online Safety Lead should also be identified. The Lead DSL roles for safeguarding and Deputy DSL role(s) should be explicit in the postholder's job description.

- Ensuring that the Academy always has at least one DSL on site (if this is not possible the DSL must be contactable such as by phone) and all staff and parents/carers should know who the DSLs in the Academy are and should know that they are the referral route for any concerns both inside and outside of term time and Academy hours.
- Ensuring that the Academy will share with staff which DSL/DDSLs are available when outside of term time.
- Ensuring they and the DSLs are all familiar with the local procedures and referral routes governed by Local Safeguarding Children Partnerships previously known as Local Safeguarding Children's Board (LSCB)
- Ensuring that all staff adhere to the DEMAT Behaviour policy and Children Missing Education policy
- Ensuring that the DSL ensures all adults are aware of referral procedures for reporting and dealing with safeguarding and child protection issues in line with this policy.
- Ensuring appropriate structures are in place to support DSLs in terms of time and resources to fulfil their role and personal welfare support regarding their role in dealing with traumatic incidents and to maintain their own wellbeing.
- Ensuring all adults promote and support positive health, wellbeing, positive relationships, emotional and mental health among young people
- Ensuring they hold at least two, ideally three, up to date emergency contact numbers for pupils.
- Ensuring all children have access to an appropriate curriculum, differentiated to meet their needs including the statutory curriculum 'Relationships education, relationships and sex education (RSE) and health education (DfE, 2019)'
- Ensuring all pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. The Academy's PSHE curriculum is supplemented with additional online safety learning opportunities to ensure, at least, statutory compliance.
- Ensuring all children are taught to recognise when they are at risk and how to get help when they need it
- Ensuring that where pupils are educated off site or in alternative provision the Academy will obtain written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment. There must be clear procedures about managing safeguarding concerns between the two agencies.
- Ensuring staff are familiar with and effectively use CPOMs for recording, monitoring and reviewing safeguarding.
- Ensuring that DSLs and DDSLs meet as a team to share information, monitor, challenge and ensure appropriate action is taken, at least fortnightly.
- Ensuring they ensure safeguarding is a standing item on all Senior Leadership Meeting and Staff meeting agendas.
- Ensuring processes are in place to identify children who may benefit from early help and ensure effective information sharing with external agencies
- Ensuring the risks and issues in the wider community are considered with regards to the well-being and safety of its pupils
- Supporting staff to consider the importance of considering wider environmental factors in a child's life that may be a threat to their safety and/or welfare
- Ensuring they report to the Trust Central Team, and in turn Trustees, through the half termly safeguarding report patterns Academy level compliance and trends in activity
- Ensuring they promptly deal with allegations of abuse in accordance with procedures agreed by the Trust policy and locally owned policy.
- Ensuring they promptly deal with allegations against adults in line with the Trust's Statement for Dealing with Allegations Against a Member of Staff and Safeguarding Partnerships guidance, including a referral to the Designated Officer for the local authority.

- Ensure that low level concerns are dealt with in accordance with the DEMAT Low Level Concern policy.
- Ensure an annual safeguarding report is made to the full governing body. Any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is understood and followed by all staff. It will be published on the Academy website.
- Ensure that children's exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems.
- Ensure children's wishes and feelings are taken into account where there are safeguarding concerns.
- Ensure safer recruitment procedures are in place and followed.
- Each Academy follows the process and procedure for dealing with allegations and complaints.
- Ensure children are being taught about safeguarding, and that Academy leaders are regularly reviewing and monitoring its scope and efficacy.

### **The Local Governing Body and Safeguarding Governor is responsible for:**

- Monitoring that the Academy regularly provides relevant safeguarding children training for **all** Academy staff and volunteers.
- Checking that the Academy senior team are monitoring the SCR at least monthly and all vetting is in place for all governors and staff at least **termly**
- Dedicating meeting time through standing items to considering child protection matters including referrals
- Using the DEMAT Governor Safeguarding monitoring form

Governing bodies should ensure they facilitate a whole Academy/college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and local policy development.

The governing body fully recognises its responsibilities with regards to safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and training in Academy are effective and comply with the law and government guidance at all times.

Each Academy also has a named governor for safeguarding & child protection who is also trained on a regular basis and who has the responsibility to ensure that the Academy has an effective policy, structures & monitoring in place to support the safeguarding of children.

The local governing body has responsibility for ensuring that there are sufficient measures in place to safeguard the children in their establishment.

## **Recording**

All DEMAT Academies use CPOMS online software to quickly and securely record all information they have on a child in one place. Academies must record safeguarding information, mental health & well-being, relevant outside agency contact and parental contact, related to a pupil on their CPOMS file. Academies must use CPOMS to record behaviour concerns and sanctions, as well as actions related to improving attendance. However, all adults within the Academy must report safeguarding concerns directly to safeguarding staff, not just rely on alerts on CPOMS; CPOMS is for 'recording, not reporting'.

Academy leadership teams will consistently quality assure responses to reports on CPOMs from DSLs and regularly analyse the data collected from CPOMs. Central Team safeguarding staff are also able to monitor CPOMs at the Academy and at an over-arching Trust level.

The recording of 'Low Level Concerns' related to staff & other adults within Academy must follow the DEMAT Low Level Concerns policy which documents how such concerns will be recorded. They must also ensure files for allegations made against staff are held securely. Academies must follow the Managing allegations against staff policy, when an allegation is made against any adult employed or volunteering in Academy.

The Trust Central Team analyse and report to Trustees Trust-level data around safeguarding and inclusion from CPOMs and Pupil Asset.

## Training

### Induction

All staff, including temporary staff and volunteers, will be provided with induction training that includes:

- This Policy
- The Staff Code of Conduct policy and Whistleblowing policy, staff Acceptable Use Policy and the Academy Behaviour Policy
- Role of the DSL and their identity and contact details together with that of and their Deputy/ies', alongside how to raise a concern in Academy
- CPOMs recording training
- Academy context specific information, such as particular risks in the Academy and community
- A copy of 'Part 1 and Annex B of Keeping Children Safe in Education 2022'
- Safeguarding and Child Protection training (level 1 equivalent including online safety, child-on-child abuse, low level concerns and contextual safeguarding elements relevant to individual Academies), which will be updated annually
- Termly Safeguarding & Child Protection refreshers (level 1 equivalent including online safety and child-on-child abuse)
- Safeguarding procedures in response to children who go missing (as outlined in DEMAT Children Who Go Missing Policy)

All staff will complete the additional modules below (optional for Volunteers):

- The Key Safeguarding online module on Prevent/Channel
- The Key Safeguarding online module on Sexual violence and sexual harassment between children and young people
- The SmartLog module on Equality and Diversity
- The SmartLog module on Safeguarding & Child Protection

### Child protection and Safeguarding training for all staff & volunteers

All staff, including the Headteacher, will receive a copy of this policy and Part 1 and Annex B of Keeping Children Safe in Education 2022 and the DEMAT Code of conduct, and will be required to confirm that they have read and understood these. A record of this will be kept on the Academy's SCR and SmartLog for training and auditing purposes.

The Headteacher and all staff members will undertake appropriate child protection training, which will be updated annually, with termly updates. Training will include guidance on the duties

of staff in relation to both children in need and children at risk of harm. In addition to all staff attending Safeguarding and Child Protection training, all staff will receive regular updates via email or staff meetings to keep their skills and knowledge up to date.

Staff development will also include training on online safety and the requirement to ensure children are taught about safeguarding (including online safety) and around child-on-child abuse, including that of a sexual nature.

Additionally, Academy leaders and DSL will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as: domestic abuse, radicalisation, child sexual exploitation; criminal exploitation including through 'County Lines', female genital mutilation, cyberbullying, child-on-child abuse (including sexual violence and sexual harassment) and mental health.

The Academy will ensure that ongoing development training supports staff to appropriately identify and respond to the issues referenced above. All members of the DEMAT Central Team, the local Governing Body and Trust Board Members will undertake appropriate training annually to enable them to fulfil their safeguarding responsibilities. This will include:

- The Key Safeguarding Training Centre general KCSIE training (all governors annually)
- PREVENT (all staff, volunteers, and governors)

### **Staff with leadership roles around Child protection and Safeguarding training for all staff & volunteers**

All safeguarding trained staff will receive full DSL training, via a recognised body, at least every two years, with at least annual refresher safeguarding training utilising Local Safeguarding Board provision and Trust DSL networks & training. The Academy will keep a local record of training undertaken on the Academy's Single Central Record (SCR) and SmartLog, including personnel and dates.

The headteacher, DSLs and relevant senior leaders and administrative staff will maintain accredited Safer Recruitment training every two years and have a valid certificate to confirm this and update at least annually using the Trust commissioned e-learning modules.

Safer Recruitment Consortium accredited Safer Recruitment training is available to all relevant adults who are involved in the recruitment process during the Autumn term. Staff with responsibility for recruitment should undertake this training every two years and a refresher accessed online via The Key Safeguarding package at least annually or when updates of KCSIE are released.

As part of the shortlisting process, schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.

## **Record Keeping, Information Sharing and Confidentiality**

The Academy will keep clear, detailed, accurate, written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately. Language used should be **professional, factual and non-inflammatory**.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing via CPOMS. Concerns and referrals will be stored on CPOMS, the Academy's electronic recording software, in a separate safeguarding file for each child.

Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

A historic hardcopy of previous safeguarding files should be kept confidential and stored securely, away from pupils' standard Academy files, even if Academy chooses to scan previous files onto CPOMS. It should be noted on each pupil's file if a previous paper file exists.

Where children leave the Academy, the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and **within 5 days** for an in-year transfer or within the **first 5 days** of the start of a new term to allow the new school or college to have support in place for when the child arrives, in accordance with 'Keeping Children Safe in Education, 2022

The DSL will consider whether it would be appropriate to share information with the new Academy/college in advance of a child leaving.

The DSL will make parents aware that such records exist, except where to do so would place the child at risk of harm.

All actions, decisions and information shared will always be in the best interests of the child. In Safeguarding Practice Reviews, a lack of effective information sharing within services and between services is a common factor. KCSIE states: *'The Data Protection Act 2018 and GDPR do **not** prevent the sharing of information for the purposes of keeping children safe' which includes allowing practitioners to share information without consent...*

All staff and volunteers must understand that they have a professional responsibility to share information with other agencies to safeguard children. Staff must ensure confidentiality protocols are followed and information is shared appropriately. The Headteacher and DSL will disclose information about a pupil to other members of staff on a need-to-know basis only whilst ensuring key information is shared with staff to support the monitoring and safeguarding of vulnerable children.

Staff who receive information about children and families in the course of their work **must** pass this on to the DSL/DDSLs. Where a member of staff is in doubt about whether to share information they should seek guidance from the DSL/DDSLs.

Staff bear the professional responsibility to share relevant information about the protection of children with other professionals, particularly investigating agencies, under the guidance of the DSL/DDSL and as set out in 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018.

Safeguarding/child protection records must be kept securely held on CPOMs with hard copies of letters etc in locked storage. The storage and processing of such information is governed by the Data Protection legislation. The Headteacher should give clear advice to staff on their responsibilities under this legislation. If in doubt the Trust Data Protection Officer should be contacted for further advice and guidance.

Personal information about all children and their families is confidential and is governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018. All staff

must maintain this confidentiality. All records relating to child protection/safeguarding incidents will be maintained by the DSL/DDSLs and only shared as is consistent with the law relating to the protection of children.

If a member of staff receives a **Subject Access Request** (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL or Headteacher, who will contact the Trust Data Protection Officer immediately.

The DSL will ensure that staff are clear with children that they **cannot** promise to keep secrets.

In cases where the 'serious harm test' is met, Academies must withhold providing the data in compliance with the Academy's obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt Headteachers should seek advice from the Trust Data Protection Officer.

In the event of a child who is being dealt with under the LA and Academy's safeguarding procedures is transferring to another school, the Academy will:

- Find out the name of the receiving school
- Inform the destination school, Virtual school Headteacher and Local Authority, as appropriate
- Contact the relevant member of staff at that School to discuss the transfer
- Deliver all information relating to the child in person to the receiving school and get a dated and signed receipt or send by signed for recorded delivery. The Academy must keep a record of receipts and signatures relating to the transfer of confidential files; these can also be scanned to CPOMs before the file is archived.
- Check with the receiving school that the child has arrived there on the expected day
- Inform all relevant agencies, including the Designated Officer for the Local Authority, of the transfer.
- Work with agencies to ensure vulnerable pupils such as those with SEND or previously looked after, remain safe.

## Monitoring

DEMAT Academies, governors and Central Team undertake regular quality assurance and monitoring of safeguarding to ensure effective practice. The DEMAT Playbook sets out the precise detail of what is required from staff, governors, and trustees.

### Headteacher monitoring

All monitoring and compliance checks are carried out in accordance with the expectations set out in the Compliance section

Headteachers must monitor that:-

- All staff and governors have read and accepted the safeguarding policy and KCSIE 2022 via SmartLog.
- All staff record safeguarding information, mental health & well-being, relevant outside agency contact and parental contact, related to a pupil is on their CPOMs file.
- All actions undertaken in relation to safeguarding are reported on CPOMs until the point the case is closed
- The recording of 'Low Level Concerns' related to staff & other adults within Academy, is completed and acted upon with documents filed securely. They must also ensure files for allegations made against staff are held securely.
- The Allegations Against Staff policy is followed, when an allegation is made against any adult employed or volunteering in Academy, which includes reporting to the LADO.

- Half termly DEMAT safeguarding report is completed by 5pm on the final Monday of each half term and is shared with the LGB at the next meeting.
- The Headteacher and DSL meet fortnightly to monitor individual cases, trends, and responses to all safeguarding concerns.
- Actions are recorded and added to CPOMs where appropriate,
- SCR is checked monthly -actions recorded on SCR 'Review' tab
- There is a fortnightly CP file audit- then categorised as an incident on CPOMS as 'SLT Reviewed'
- Safeguarding monitoring walks of Academy are completed in the first week of each term, for example, reviewing end of day handover procedure, curriculum coverage, site safety, lunchtime supervision, etc.
- Pupil voice questionnaires "How to keep safe" twice a year are completed and the results shared with LGB
- The Online Safety curriculum is reviewed termly to ensure supplementary sessions/teaching is embedded, over and above the Cambridgeshire PSHE curriculum, to ensure statutory compliance and effective practice
- Safeguarding is be included as a standing item in weekly staff meetings
- The Academy engages with external or Central Team safeguarding reviews annually
- Safeguarding reports and updates are reported to LGB.

### **Governors' Monitoring**

Each Academy must have a nominated Safeguarding Governor who will

- Review the SCR monitoring records termly
- Meet with the DSL termly to review trends, patterns, and Academy monitoring outcomes
- Use the DEMAT governor safeguarding monitoring form
- Ensure safeguarding is a standing item in each LGB meeting, which may include termly feedback, and will include an annual summary of their safeguarding monitoring

### **Trust monitoring**

The School Performance Director (Inclusion & Safeguarding) will carry out the following monitoring on behalf of the Trust:-

- Monitor the Academy's statutory safeguarding compliance through:
  - the Academy Single Central Record (SCR), which will be monitored twice per year by Central Team HR & Safeguarding staff.
  - the Trust annual Safeguarding Self-audit
  - regular Designated Safeguarding Network meetings and training
  - regular analysis of CPOMs recording system and Spotlight CPOMs online monitoring software
  - regular on-site monitoring visits
  - annual safeguarding in-person audit either externally commissioned or undertaken by Trust Central Team staff
  - quality assurance through Trust escalation where appropriate
  - regular review of the Academy and Trust risk registers
- Broker and monitor the effectiveness of support for any aspects identified
- Agree and monitor the DSL Network and training to support DSLs across the Trust.
- Support the Headteacher, the Lead and Deputy DSL of the Academy regarding escalation of child protection/safeguarding child issues.
- Report as appropriate any concerns regarding Headteachers to the Designated Officer for the specified region.
- Ensure all Central Team staff and Trustees have relevant training and guidance relating to Safeguarding and Child Protection.
- Provide clear guidance on and regularly monitor the completion of statutory checks on the suitability of adults to work in Academy.

- Provide safer recruitment training **annually** and support to Academy leaders to ensure adherence to safer recruitment practices.
- Ensure safeguarding training reflects regional and national learning and emerging themes and trends.

## Liaison with Other Agencies

The Academy will:

- Work to develop effective links with relevant services to promote the safety and welfare of all pupils/students.
- Co-operate as required, in line with 'Working Together to Safeguard Children,' (July 2018), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.
- Notify the relevant Social Care Team immediately if:
  - it should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently);
  - there is an unexplained absence of a pupil who is subject to a Child Protection Plan;
  - there is any change in circumstances to a pupil who is subject to a Child Protection Plan.

When a pupil who is subject to a child protection plan leaves, information will be transferred to the new school immediately. The Child Protection Chair and Social Work Team will also be informed.

The DSL should liaise with the headteacher to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019

## Communication with Parents/Carers

The Academy will:

- Ensure that parents/carers are informed of the responsibility placed on the Academy and staff in relation to child protection by setting out its duties on the Academy website.
- Undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this action.
- Discuss with Children's Social Care if the Academy believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime.
- Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.
- Follow LA procedures for situations where homelessness or home education affects pupils.

## Child-on-Child Abuse

We recognise that child-on-child abuse can manifest itself in many ways. This can include, but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying);

abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting as contemplated in the Voyeurism (Offences) Act, April 2019) and initiation/ hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

All forms of child-on-child abuse are unacceptable and will be taken seriously. The Academy will therefore:

- Create a whole Academy protective ethos in which child-on-child abuse, including sexual violence and sexual harassment will not be tolerated.
- Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators.
- Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence and sexual harassment as an inevitable part of growing up.
- Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from other children and online.
- Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent.
- Provide preventative education in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. These will be underpinned by the Academy's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum
- Ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

## **Dealing with Sexual Violence and Sexual Harassment between children**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same Academy or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

The Academy will:

- Be clear that sexual violence and sexual harassment will not be tolerated.
- Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- Make decisions on a case-by-case basis.
- Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- Liaise closely with external agencies, including police and social care, when required.

Refer to 'Keeping Children Safe in Education - Part Five', 2022, 'Sexual violence and sexual harassment between children in Academies and colleges,' (DfE, September, 2021) for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, December 2020)

## Supporting children

The Academy recognises that **any** child may be subject to abuse and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and as such will support all children by:

- Providing curricular opportunities to encourage self-esteem and self-motivation.
- Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- Ensuring that pupils are proactively taught what behaviours are expected in Academy and supported to achieve this by understanding that some behaviour is unacceptable but they are valued and not to be blamed for any abuse they have been victim of.
- Ensuring the DSL/DDSLs liaise with the senior mental health lead where safeguarding concerns are linked to mental health in Academy/college for advice on case management.
- Liaising with other agencies which support the pupil such as Social Care, Child and Adolescent Mental Health Services or Early Help Teams.
- Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances

Academy recognises that experiencing abuse or neglect may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. Academy may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the Academy or college and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Academy will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy.

The Academy recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life that could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances.

## **Children with Disabilities, Additional Needs or Special Educational Needs**

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. Academy staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

As part of the PSHE curriculum, staff will teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how recognise and manage risk including in a digital context. The content of lessons will be shared with parents/carers so that these skills can be supported at home.

The Academy has pupils who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

Where necessary, the Academy will provide additional training to staff in the use of Makaton, PECS or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the child.

We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate.

## **Young Carers**

The Academy recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

The Academy will: seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

## Children at Risk of Criminal Exploitation

Criminal exploitation of children is a form of harm that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. Academy will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

The DSL can complete a Risk Assessment Tool, such as Cambridgeshire & Peterborough's Safeguarding Children Partnership Board's [Exploitation-Risk-Management-Tool.docx \(live.com\)](#) and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.

The Academy recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

## Children Frequently Missing Education

Academy recognises that children going missing, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The Academy monitors attendance of individual pupils closely, as outlined in the Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.

The Academy endeavours to hold at least two, ideally three, up to date emergency contact numbers for pupils for each pupil to provide additional options to make contact with a responsible adult when a child missing education is identified as a welfare and/or safeguarding concern.

When a child is missing from education, the Academy follows the procedure as set out in DEMAT's Children Missing Education guidance. The Academy will inform Social Care if a missing child is subject to a Child Protection Plan or there have been ongoing concerns.

## Children at Risk of Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

The DSL will complete a Risk Assessment Tool, such as Cambridgeshire & Peterborough's Safeguarding Children Partnership Board's [Exploitation-Risk-Management-Tool.docx \(live.com\)](#) and refer to Social Care if there is a concern that a young person may be at risk of CSE.

The Academy recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

## Children Living with Substance Misusing Parents/Carers

Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.

When the Academy receives information about drug and alcohol abuse by a child's parents/carers they will follow appropriate procedures.

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children.
- Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers.
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour.
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance.
- Disturbed moods as a result of withdrawal symptoms or dependency.
- Unsafe storage of drugs and/or alcohol or injecting equipment.
- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child.

## Children Living with Domestic Abuse

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are 'personally connected' regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

The Academy recognises that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The Academy will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency plan as required.

The Academy is working in partnership with Police and the local authority to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

In order to achieve this, local authority and/or police will share police information of all domestic incidents, where one of our pupils has been present, with the DSL/DDSL(s) /Domestic Abuse (DA) Lead.

On receipt of any information, the DSL/DA Lead will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information on the Academy's CPOMs system. All information sharing and resulting actions will be undertaken in accordance with the Local Authority 'Joint Agency Protocol for Domestic Abuse'.

## **Children at risk of 'Honour- Based' Abuse including Female Genital Mutilation**

So called 'honour-based' abuse (HBA) encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The Academy takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed

before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

## **Children who have returned home to their family from care**

The Academy recognises that a previously looked after child potentially remains vulnerable. Academy will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in accordance with the Local Safeguarding Children Partnership Board 'Inter - Agency Procedures.'

## **Children at Risk of Radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a Academies' or colleges' safeguarding approach.

The governing body will ensure that the DSL has undertaken Prevent awareness training and that all staff receive training about the Prevent Duty.

Staff are required to be alert to changes in children's behaviour, which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The Academy's DSL (and any deputies) should be aware of local procedures for making a Prevent referral.

See also 'The Prevent Duty, Departmental advice for Academies and childcare providers', DfE (June 2015), and 'Revised Prevent Duty Guidance: for England and Wales,' HM Government, (July 2015).

## **Privately Fostered Children**

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

The Academy will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team.

## **Children who have Family Members in Prison**

The Academy is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.

The Academy recognises that children with family members in prison are at risk of poor outcomes including poverty, stigma, isolation, poor mental health and poor attendance.

The Academy will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.

The Academy will work with the family and the child to minimise the risk of the child not achieving their full potential.

## Staff Conduct

Staff are expected to adopt a high standard of personal conduct in order to maintain the confidence and respect of colleagues, children and parents.

Staff should be aware that safe practice also involves using judgement and integrity about behaviour in places other than work, including online.

Children face safeguarding risks in exploring the digital world. Staff should adopt responsible online behaviour and must not make contact with children or their families through anything other than official Academy accounts.

No child should be in or invited into the home of a member of staff unless the reason has been firmly established and agreed with parents and the Headteacher.

Any giving of gifts and reward should only be part of an agreed policy for recognising exceptional work, and should be part of an agreed plan sanctioned by the Headteacher or a senior member of staff with delegated responsibility.

There are circumstances where staff working with children displaying extreme behaviour can legitimately intervene by using restrictive and non-restrictive physical interventions. In such circumstances only staff who have received relevant training may do so and staff must adhere to DEMAT physical intervention and restraint policy. This should always depend on the individual circumstances and be informed by the professional judgement of the staff concerned. All incidents of restraint must be recorded and monitored appropriately in line with Academy guidance.

Where children are in some distress and need reassurance some physical contact may be helpful. For some children any physical contact may be construed as a threat, no matter how well intended. Staff must use careful professional judgement in comforting children in an age appropriate way while maintaining clear professional boundaries.

At all times staff must adhere to the Academy policy and to seek guidance if in doubt. Staff must never touch a child in a way which might be considered indecent or inappropriate and must not assume that all children seek physical comfort if distressed.

## Low-Level Concerns - Concerns that do not meet the harms threshold (Part Four, Section Two)

Low level concerns that do not meet the harms threshold should be reported to the Headteacher. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test. If in doubt, the LADO should be consulted for advice.

In cases where the Headteacher is the subject of concern or allegation, it will be reported to the CEO. The Academy will follow the procedures set out in the DEMAT Low Level Concerns policy which is based upon Part Four of 'Keeping Children Safe in Education'.

The Academy will deal with any such concern, no matter how small, where an adult working in or on behalf of the Academy or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; **and**
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted.

Records will be kept in accordance with the DEMAT Low Level Concerns policy and will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

The Academy will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the Academy (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This will enable the Academy to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the Academy/college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

The Academy will ensure that **all** staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the DEMAT Code of Conduct, 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (May 2019). As part of the Induction process, all staff, paid and unpaid, will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.

The Headteacher will ensure that all staff in the Academy have signed to confirm that they have read 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (May 2019) via Smartlog. In the Central Team, this will be the responsibility of the CEO.

The Academy will ensure that staff, supply staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

## Allegations that may meet the harms threshold (Part Four, Section One)

Any allegation of abuse made against a member of staff (including supply staff and volunteers) that meets the harms threshold as set out in Keeping Children Safe in Education, 2022, Part Four, Section One, will be reported straight away to the Headteacher or CEO in the case of Central Team members.

In cases where the Head Teacher is the subject of an allegation, it will be reported to the Trust Central Team [hrteam@demat.org.uk](mailto:hrteam@demat.org.uk). The Academy will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2022.

The Headteacher or CEO will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a member of staff, volunteer or agency/supply staff and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', 2022 and DEMAT HR policies.

The Headteacher or, if the allegation relates to the Headteacher, the CEO, will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.

Before contacting the LADO, Academies should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

Where the Academy identifies a child has been harmed, they should contact Children's Social Care and as appropriate the police immediately.

The Academy will consider:

**Looking after the welfare of the child** - the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority Children's Social Care.

**Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

The Academy will ensure that any disciplinary proceedings against staff, supply staff or volunteers relating to child protection matters are concluded in full even when the member of staff, supply staff or volunteer is no longer employed at the Academy and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

Staff (including supply staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

## Use of Academy premises for non-Academy activities

If the governing body provides extended Academy facilities or before or after Academy activities directly under the supervision or management of Academy staff, the Academy's arrangements for safeguarding as written in this policy shall apply.

Where services or activities are provided separately by another organisation or individual, either on or off Academy site, the governing body will seek assurance that they have appropriate policies, training and procedures, including agreeing how and when to report any concern to the Academy, in place to keep children safe and there are arrangements to liaise with the Academy on these matters where appropriate. Details of those undertaking these activities on Academy site, will be shown on the Academy's SCR.

Safeguarding requirements will be documented within any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of premises; and that failure to comply with this would lead to termination of the agreement.

## Engaging Parents/Carers

Parents play a crucial role in protecting their children from abuse. The Academy is required to consider the safety of the child and should a concern arise the DSL has the responsibility to seek advice prior to contacting parents.

The Academy will work with parents to support the needs of their child and aims to help parents understand that it has a responsibility for the welfare of all children and has a duty to refer cases to the appropriate Local Authority department in the interests of the child.

DSLs will undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this action. DSLs will discuss with Children's Social Care and/or the police if the Academy believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime.

The Academy will record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

In relation to Channel referrals, the DSL will consider seeking the consent of the pupil or their parent/guardian when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

## Whistleblowing

All staff and volunteers should be able to raise concerns should they consider there to be poor or unsafe practice and potential failures in the safeguarding regime and know that concerns are taken seriously by the leadership team. Whistleblowing procedures are in place across the Trust and are available on request, on the DEMAT website [www.demat.org.uk](http://www.demat.org.uk) or on Academy websites.

Ofsted, LADO, Social care, and the police may also be contacted if appropriate.

The NSPCC whistleblowing helpline is available for staff who feel unable to raise concerns directly on 0800 028 0285 or help@nspcc.org.uk

## Safeguarding and Child Protection Guidance for Trust Central Team Staff and Trustees

The Trust Central Team staff and Trustees fully recognise their legal responsibilities for safeguarding children and child protection as set out in this policy and the relevant legal framework.

This guidance is to identify personnel to contact should an incident or concern arise relating to the safeguarding of pupils during Academy visits and regarding concerns relating to staff or adults in academies or colleagues based in the Central Team.

It is expected that all concerns are referred immediately and confidentially via email, within a maximum of 24 hours. The person/s making the referral should seek confirmation that the concern has been acted upon.

<b>Concern relating to:</b>	<b>Action to be taken:</b>
A member of DEMAT Central Team.	Report the concern to the CEO
CEO.	Report the concern to The Chair of the Board of Trustees
A member of the Board of Trustees.	Report the concern to The Chair of the Board of Trustees
The Chair of the Trustee Board.	Report the concern to the LA Designated Officer (formerly known as LADO) in relation to the Trust registered address and to the Department for Education (DfE).
Please note: If an adult does not feel their concern has been acted upon appropriately, they are able to refer their concern directly using the DEMAT Whistleblowing Policy or directly to the Designated Officer for the Local Authority. If the concern is of a criminal nature this should be referred directly to the Police.	

## Appendix 1

The details of the Designated Safeguarding Lead (DSL) for the Academy are as follows:

[name]  
[address/email address]  
[telephone number]

The Details of the Deputy Designated Safeguarding Lead for the Academy are as follows:

[name]  
[address/email address]  
[telephone number]

The Details of the [Insert LA name] Local Authority designated officer (LADO) are as follows:

[insert email address]  
[insert telephone number]

The telephone numbers of the [name of Local Authority] Children's Social Care services departments are as follows:

Main Referral contact – [telephone number]  
Out of Hours/ Emergency Duty Team – [telephone number]  
Early Help team / other –[telephone number]

The telephone numbers of relevant Prevent partners are as follows:

Channel Police Practitioner [telephone number]  
Channel Local Authority Chair [telephone number]

The following telephone numbers may be useful

Headteacher:

[name]  
[email address]  
[telephone number]

Chair of Local Governance Body (LGB):

[name]  
[email address]  
[telephone number]

Designated teacher for Looked After (LAC) or previously Looked after children:

[name]  
[email address]  
[telephone number]

Academy Mental Health Lead:

[name]  
[email address]  
[telephone number]

Other Useful contacts:

NSPCC Childline 0800 1111

NSPCC 0808 800 5000 (help@nspcc.org.uk)

Ofsted's Whistleblower Hotline 0300 123 3155 18

NSPCC FGM Helpline details: 0800 028 3550

NSPCC Gangs Help Line details: 0808 800 5000

NSPCC Whistleblowing advice line 0800 028 0285

Forced Marriage Unit: 020 7008 0151

[fm@fco.gov.uk](mailto:fm@fco.gov.uk)

Monday to Friday, 9am to 5pm

Out of hours: 020 7008 1500 (ask for the Global Response Centre)

## Appendix 2 – Procedure flowchart

### Actions where there are concerns about a child

