Child Protection and Safeguarding Policy

Date Adopted: 1st September 2023
Author/owner: Board of Trustees
Review: Annual

NB. 'Trustees' means the Directors referred to in the Trust's Articles of Association

History of most recent policy changes

Version	Date	Page	Change	Origin of Change e.g. TU request, Change in legislation
V1.0	September 2022	Whole document	New safeguarding and child protection policy for whole Trust to ensure consistency across TLP	KCSIE and feedback from SgLs

Contents

This policy sets out the child protection and safeguarding policy and procedures for Tarka Learning Partnership and has been adapted to show local arrangements in the school to which it applies.

1. Aims

Policy Statement

This Policy has been reviewed, authorised and adopted by the Tarka Learning Partnership Board of Trustees. It applies to all members of staff, workers, trainees, Members, Trustees, Consultants, contractors, School / Academy Community Board (SCB), volunteers, pupils and visitors in our Academies. It also applies wherever staff or volunteers are working with pupils away from the TLP, for example, at an activity centre or on an educational visit.

This Policy will be shared in full with staff. It will be made available to parents/carers on request and can be produced in larger print or other more accessible formats if required. It will be published on the TLP website.

Each Academy/School in the Tarka Learning Partnership will adopt the Policy, having adapted the procedures and other appendices to suit their setting, and will publish it on their website. They will ensure that is made available, in creative ways that are more accessible to all pupils, parents/carers and visitors.

Across the Trust children need to be safe and all adults need support and safety in the work that they do to ensure this. The importance of relationships and clear structures and systems is paramount in order to protect children and young people and engender an ethos and culture of safeguarding in all schools and teams. Every effort will be made to ensure that staff are supported to protect children proactively as well as reactively. Children will be helped to develop understanding in order to not only protect themselves but see their role in supporting others as they develop into young adults.

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

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2022) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
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- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Head Teacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

Within the Trust this policy sits within a suite of polices that, when used to together, aim to protect children and staff which include:

Trust based

- Child protection and Safeguarding
- Contractor policy and safeguarding guidelines
- E safety
- Managing Allegations made against staff
- Safe touch and positive handling
- Safer recruitment
- Staff code of conduct
- Staff DBS and employing ex-offenders
- Volunteers and students in school

School based

- Behaviour
- SEND & Inclusion

Are integral to

- Attendance and punctuality
- Health needs that cannot attend school
- Curriculum
- EDI
- Outdoor education visits and trips
- Pupil exclusion
- Social Media
- Whistle blowing
- Dignity at work

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment

- Preventing impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

- Taking action to enable all children to have the best outcomes

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

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

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

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)

- A clinical commissioning group for an area within the LA

- The chief officer of police for a police area in the LA area

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

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

 'Adults at Risk' or 'Vulnerable Adults' are also protected against abuse by legislation. They are defined as those 'aged 18 years or over who are, or maybe, in need of community care services by reason of mental or other disability, age or illness or who are unable to care for themselves, or unable to protect themselves against significant harm or exploitation' (No Secrets DH 2000). This may include adults with learning difficulties, mental health issues, physical impairments or drug and alcohol misuse. We may have 'Vulnerable Adults' in our schools or community as parents/carers, siblings, visitors etc., and all of the principles and reporting procedures relating to Child Protection also apply to this group
This policy refers to **Schools** this should be taken as School or Academy.

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)

- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

- Have English as an additional language

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

- Are asylum seekers

- Are at risk due to either their own or a family member's mental health needs

- Are looked after or previously looked after (see section 12)

- Are missing from education

- Whose parent/carer has expressed an intention to remove them from school to be home educated
  This statement is supported by the TLP/School's Equality and Diversity policy.

Prejudice Related incidents (PRI)

We are committed to reducing Prejudice Related incidents (PRI) across the Trust and school:

- Any PRI will be recorded and reported to the local authority.

- There is a clear process from the reporting and investigation of any PRI

- Both victims and perpetrators of PRI will receive support

- Staff and children will be supported in their understanding of the nature of PRI

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, School Community Board (SCB) members, contractors*, members and trustees across our Trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

*Contractors should also refer to the TLP Contractor Policy and Safeguarding Guidelines.
The Trust and school play a crucial role in preventative education. This is in the context of a whole-trust approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by the school's:

- Behaviour policy

- Support system for additional needs

- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

o Healthy and respectful relationships

o Boundaries and consent

o Stereotyping, prejudice and equality

o Body confidence and self-esteem

o How to recognise an abusive relationship (including coercive and controlling behaviour)

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

o What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff in schools are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE) on an annual basis – staff will be supported by publications and training in September each year indicating changes.

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually

- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

- Provide a safe space for pupils who are vulnerable and in minority groups, including those identifying as LGBT, to speak out and share their concerns

- Develop strong and clear relationships with pupils and students to ensure that there are trusted adults who can support and respond to the needs of the child as well as monitoring the child's well being at all times.

All staff will be aware of:

- the role and identity of the designated safeguarding lead (DSL) and deputies (DDSL) the school's behaviour policy and e safety policy, and the safeguarding response to children who go missing from education

- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- The fact that children can be at risk of harm inside and outside of their home, at school and online

- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children

- What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The DSL for the school is named in this document and contact details are provided. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

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

When the DSL is absent, the Deputy DSL (DDSL) will act as cover.

If the DSL and DDSL are not available, the head teacher should be contacted or a member of the Trust Team (Director for Inclusion& Safeguarding (DIS) or CEO).

Schools should make clear their arrangements for cover for out-of-hours/out-of-term activities.

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

- Provide advice and support to other staff on child welfare and child protection matters

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

- Have a good understanding of harmful sexual behaviour

The DSL will also:

- Keep the Head Teacher informed of any issues

- Through agreed processes, provide reporting to the Director for Safeguarding & Inclusion (DIS) who will then report to Trustees on a regular basis.

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and DDSL are set out in their job description and link with the expectations set out in the latest version of KCSIE.

5.3 The Board of Trustees

The board will:

- Facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head Teacher to account for its implementation

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

- Appoint a named Trustee to monitor the effectiveness of this policy in conjunction with the full board. This is always a different person from the Director of Inclusion & Safeguarding (DIS).

- Make sure:

  o The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support

  o Online safety is a running and interrelated theme within the whole-trust approach to safeguarding and related policies

  o The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns

  o The trust has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure

  o That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

  o Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

  o Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

  o Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

  The Trust CEO will act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher where appropriate (see appendix 3) as stated in the Managing Allegations of abuse made against staff Policy and Procedure.

  All trustees will read Keeping Children Safe in Education.

  Section 15 has information on how trustees are supported to fulfil their role.

5.4 Director for Inclusion & Safeguarding

The TLP Director for Inclusion & Safeguarding (DIS) will act as the Designated Safeguarding Lead Officer and will provide advice and guidance to all the schools, central TLP team and the Board of Trustees. The DIS will report to the Board of Trustees.

They will possess a strategic overview of Safeguarding across the TLP and will work closely with the school Designated Safeguarding Leads to ensure Safeguarding Policies, Protocols and legislation are implemented across all of the TLP Schools.

The main responsibilities of the TLP Director for Inclusion and Safeguarding (DIS) are:

i.   To work with Head Teachers and Designated Safeguarding Leads in the application of effective safeguarding within their school in accordance with legislation and national and local policy

ii.   Guide and support schools on improving safeguarding practice, bring together expertise from different schools and support capacity building and training

iii.   Maintain an overview of practice and training requirements across academies

iv.   Provide clear professional consultancy and expertise in relation to any safeguarding matters to all Designated Safeguarding Leads and other relevant staff

v.   Model and promote partnership with key agencies ensuring collaboration, information sharing and integrated planning for the benefit of the child

vi.   Organise and facilitate a safeguarding meeting every term for all academy Designated Safeguarding Leads

vii.   To monitor and support the use of CPOMS across the TLP

viii. Provide support and guidance to academies/schools where an allegation against a member of staff has been made with a specific focus on the welfare of the child or young person

ix.   Ensure robust, appropriate mechanisms for information sharing between academies and other external agencies are in place, particularly the Police and Social Care

x.   Develop and nurture effective working relationships and communications across the TLP, ensuring all work in this area is compliant with relevant safeguarding legislation and local LSCB Procedures

xi.   Contribute to safeguarding reviews and updates of local procedures and policies ensuring they remain compliant with relevant national policy, legislation and regulation, including equality and anti-discrimination legislation

xii.   Support Head Teachers and Designated Safeguarding Leads to ensure every member of TLP staff has access to and understands the TLP's Safeguarding Policy and Procedures

xiii.   Collate, analyse and report on confidential and sensitive data relating to safeguarding to identify issues, establish trends and ensure that data is monitored highlighting concerns to the Board of Trustees

xiv.   Implement systems and processes to ensure compliance with mandatory training requirements

xv.   Responsible for collecting, collating and reporting findings from DSL reports to the TLP Strategic Lead and TLP Board of Trustees

xvi.   Identify and organise Safeguarding training as required for school

xvii.   Network with external agencies and providers.

5.5 The Head Teacher

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

- Ensuring that staff (including temporary staff) and volunteers:

  o   Are informed of our systems which support safeguarding, including this policy, as part of their induction
  o
  o   Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- Communicating this policy to parents/carers when their child joins the school and via the school website

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

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

- Ensuring the relevant staffing ratios are met, where applicable

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

6. Confidentiality

The school will work within the guidance set out in the Trust's Policy on Confidentiality and Data Protection Policy

It is noted that:

- Timely information sharing is essential to effective safeguarding

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

o There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

o The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

o The DSL should consider that:

▪ Parents or carers should normally be informed (unless this would put the victim at greater risk)

▪ The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

▪ Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

- Regarding anonymity, all staff will:

o Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

o Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

- o   Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

- If staff are in any doubt about sharing information, they should speak to the DSL (or DDSL)

- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

- Data will be processed to be in line with the requirements and protections set out in the UK General Data Protection Regulation.

- DSL's should pass all safeguarding records onto a child's new school/setting as and when a child leaves even if the new school does not make contact. The duty to pass on such records lies with the child's current school.

- Any enquiries from the press should be directed to the Head Teacher and to the Tarka Learning Partnership's CEO.

7. Recognising abuse and taking action

Schools use CPOMS for the monitoring of Safeguarding and Child Protection issues.
Every member of staff across the school has an obligation to report any concerns which they may have using CPOMS. The system allows the School to record information in a central repository and have relevant people alerted immediately.

All staff that have access are expected to report their concerns using CPOMS, staff will still have the opportunity to ask for advice from the Safeguarding Team and must do so if a there is a high level of concern.

Anyone who does not have access to CPOMS will be expected to fill in a school incident form. Schools will have printed versions of this in the reprographics room and staff room.

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

7.1 If a child is suffering or likely to suffer harm, or in immediate danger
You should talk to the DSL (or DDSL / Head Teacher) **immediately**.

If this is not possible you should make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. This should be to the Multi Agency Safeguarding Hub (MASH) or in case of immediate danger to the child the police should be contacted (999). **Anyone can make a referral.** If this is the case you must tell the DSL (see section 7.2) as soon as possible if you make a referral directly.

See Appendix 7 for MASH information

Additional support can be found by the following link to the GOV.UK webpage for reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions

- Stay calm and do not show that you are shocked or upset

- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Ideally this should be via CPOMs – if you have no immediate access to CPOMS this should be in written form

- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

  Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

- Not recognise their experiences as harmful

- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child. **If in doubt or you feel uncomfortable about something always speak to the DSL.**

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

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also

known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

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

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

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

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

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care via MASH. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

Early help assessment

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of

assessment, as part of local arrangements.

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

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Schools will hold regular monitoring meetings around children with additional needs in order to ensure that this process has a clear format – minutes and recordings of these meetings should be held by the school.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan(EHCP));

- is a young carer;

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;

- is frequently missing/goes missing from care or from home;

- is misusing drugs or alcohol themselves;

- is at risk of modern slavery, trafficking or exploitation;

- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
-
- has returned home to their family from care;

- is showing early signs of abuse and/or neglect;

- is at risk of being radicalised or exploited;

- is a privately fostered child

Referral: If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up

with the local authority if this information is not made available, and ensure outcomes are properly recorded. It is important when making the referral to express the level of urgency that you see necessary for action and response and follow this up if the response is not what would be expected.

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

Details for these processes can be found here: https://www.dcfp.org.uk/training-and-resources/policies-and-procedures/case-resolution-protocol-and-escalation-procedures/

7.5 If you have concerns about extremism

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

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

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

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

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

- Think someone is in immediate danger

- Think someone may be planning to travel to join an extremist group

- See or hear something that may be terrorist-related

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL, Senior Mental health Lead or SENCo to agree a course of action.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)
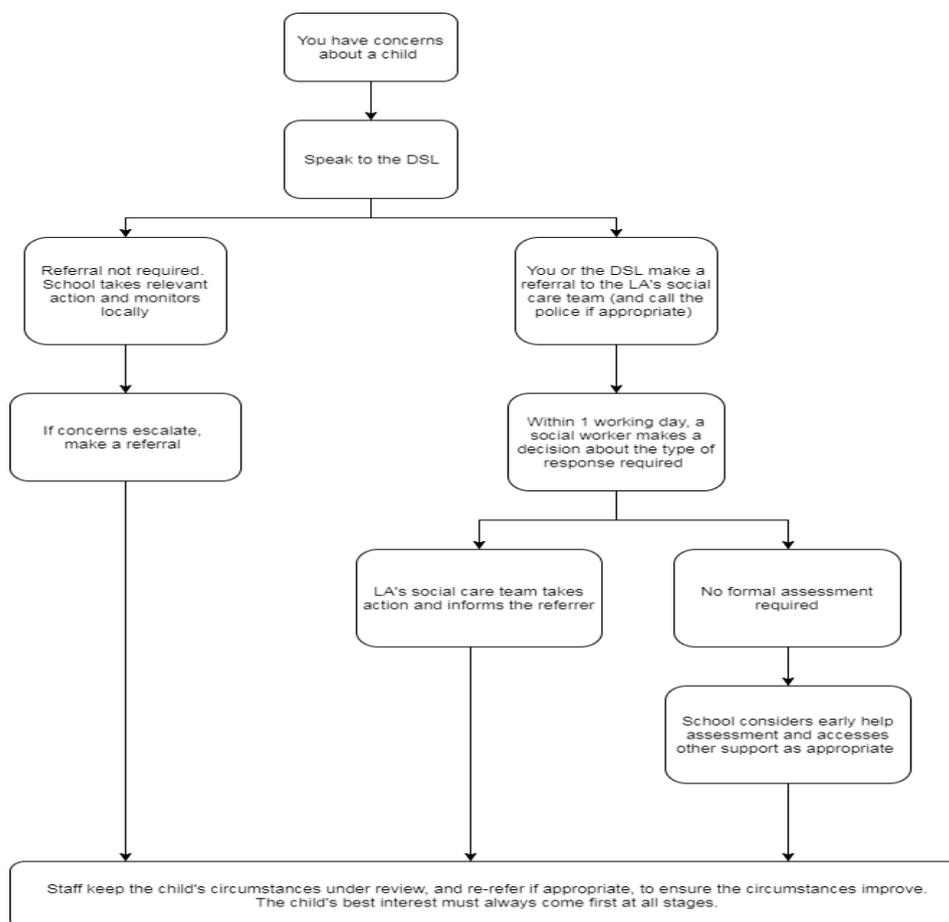
7.7 Concerns about a staff member, supply teacher, volunteer or contractor

This area is fully covered in the TLP Managing allegations of abuse made against staff Policy and Procedure.

In brief: If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the head teacher as soon as possible. If the concerns/allegations are about the Head Teacher, speak to the TLP CEO.

[If there are concerns about the TLP CEO contact should be made with the Chair of Trustees and if concerns about the Chair of Trustees contact should be made to the CEO]

The Head Teacher / CEO will then follow the procedures set out in *The TLP Managing allegations of abuse made against staff Policy and Procedure.*

Where you believe there is a conflict of interest in reporting a concern or allegation about a member

of staff (including a supply teacher, volunteer or contractor) to the Head Teacher report it directly to the Trust CEO who will then consider reporting to the local authority designated officer (LADO).

With respect to early years provision: Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence

- Could put pupils in the school at risk

- Is violent

- Involves pupils being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

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

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

- You must record the allegation and tell the DSL, but do not investigate it

- The DSL will contact the local authority children's social care team (MASH) and follow its advice, as well as the police if the allegation involves a potential criminal offence

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation and the school's policy on behaviour, discipline and sanctions will apply.
The school will take advice from Children's Social Care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of children's social care, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation.

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

- Ensure staff reassure victims that they are being taken seriously

- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

- Ensure staff are trained to understand:

o How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

o That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

o That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

▪ Children can show signs or act in ways they hope adults will notice and react to

▪ A friend may make a report

▪ A member of staff may overhear a conversation

▪ A child's behaviour might indicate that something is wrong

o That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

o That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

o The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

o That they should speak to the DSL if they have any concerns

o That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
The DSL, in conjunction with the Head Teacher, will take the lead role in any disciplining of the alleged perpetrator(s), where needed. Support must be provided at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this

- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes ('sexting')

Useful guidance in this area can be obtained from [guidance from the UK Council for Internet Safety](#)

For all staff - responsibilities when responding to an incident

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

You must **not**:
- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

- Delete the imagery or ask the pupil to delete it

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

- Say or do anything to blame or shame any young people involved

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

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

- Whether there is an immediate risk to pupil(s)

- If a referral needs to be made to the police and/or children's social care

- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

- What further information is required to decide on the best response

- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

- Whether immediate action should be taken to delete or remove images or videos from devices or online services

- Any relevant facts about the pupils involved which would influence risk assessment

- If there is a need to contact another school, college, setting or individual

- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)

- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any pupil in the images or videos is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
  If none of the above apply then the DSL, in consultation with the Head Teacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL
If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

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

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

Referring to the police
If it is necessary to refer an incident to the police, this will be done through a police community support officer, local neighbourhood police or dialing 101.

Recording incidents

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

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of school's relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is

- How it is most likely to be encountered

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

- Issues of legality

- The risk of damage to people's feelings and reputation

  Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images

- The receipt of such images

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

7.10 Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse

- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

- Pupils can report concerns or allegations to any member of staff they feel comfortable and confident with
- Through our PSHE programme we will make pupils aware of what to do if they don't feel safe.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, the school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- Set clear guidelines for the use of mobile phones for the whole school community

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

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate pupils about online safety as part of the curriculum. For example:

o The safe use of social media, the internet and technology
o Keeping personal information private

o How to recognise unacceptable behaviour online

- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present

- Staff will not take pictures or recordings of pupils on their personal phones or cameras

- Make all pupils, parents/carers, staff, volunteers and SCB members are aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website

9. Notifying and supporting parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss

this with the local authority children's social care team before doing so.

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

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

- Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. The Head Teacher should consult with the LADO about how and by whom they should be informed. However, where a strategy discussion is required, or the police or local authority children's social care services need to be involved, the Head Teacher should not do so until those agencies have been consulted and have agreed the information which can be disclosed to the parent/carers.

- Parents/carers should be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence. In deciding what information to disclose, careful consideration should be given to the provisions of the General Data Protection Regulations, the law of confidence and, where relevant the Human Rights Act 1998.

- In cases where a child may have suffered significant harm, or there may be a criminal prosecution, local authority social care services, or the Police as appropriate, should consider what support the child or children involved my need.

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

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

- Communication barriers and difficulties in managing or reporting these challenges

We offer additional support for these pupils. This can include:

- Support to overcome communication barriers.

- Support to overcome anxiety and dysregulation.

- Support to record details in a manner which is accessible to them.

- A key adult to mediate or support interactions with those with whom they may not be familiar.

- Additional processing time when supporting their understanding.

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

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks

- The provision of pastoral and/or academic support

- The consideration of exclusion.

12. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

- The DSL has details of children's social workers and relevant virtual school heads

Schools will have an appointed a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

13. Complaints and concerns about school safeguarding policies
13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

Complaints against pupils or premises that may have a safeguarding focus will follow the process of the TLP complaints policy.

Those that work in Early Years will take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.75).

13.3 Whistle-blowing

See Tarka Learning Partnership's Whistleblowing Policy: https://tarkatrust.org.uk/

- All staff are required to report to the Head Teacher of their School or if it involves the Head Teacher the Trust CEO any concerns or allegations about School practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. In the event of their unavailability, concerns should be reported to the Designated Safeguarding Lead or the Deputy in his / her absence. All staff can approach the TLP central team with concerns about the behaviours or practices in their school. If there are safeguarding concerns about the TLP central team, then staff should discuss their concerns with either the Deputy CEO or CEO or if the concerns involve these staff, then staff should discuss their concerns with the Chair of the Board of Trustees.

- If it is felt necessary to consult outside the Academy, staff should speak in the first instance to the LADO (Local Authority Designated Officer) following the Whistle Blowing Policy. Further guidance can be found in KCSIE (latest version)- Part four: Allegations of abuse made against teachers and other staff.

- There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

14. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing, usually on CPOMs. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern

- Details of how the concern was followed up and resolved

- A note of any action taken, decisions reached and the outcome

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

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.
If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within

- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

14.1 Local record-keeping arrangements

- All records are kept electronically on Cpoms. Each member of staff has their own log in so that records are secure and only accessible to alerted staff.
- Only relevant staff will have access to a record kept on a child.
  The DSL & DDSL will have elevated access to enable them to access all records and monitor trends and patterns.

15. Training
Overall guidance regarding safeguarding Training is contained in the document 'Safeguarding training and support across Tarka Trust'.

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-trust safeguarding approach and wider staff training, and curriculum planning

- Be in line with advice from the 3 safeguarding partners

- Have regard to the Teachers' Standards to support the expectation that all teachers:

o   Manage behaviour effectively to ensure a good and safe environment

o   Have a clear understanding of the needs of all pupils

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

Staff will also receive regular safeguarding and child protection updates, including on online safety,

as required but at least annually (for example, through emails, e-bulletins and staff meetings). A log will be kept of Safeguarding training across the school.

Volunteers and Members of the SCB will receive appropriate training, if applicable.

15.2 The DSL and DDSLs

The DSL and DDSLs will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals through attendance at the TLP Safeguarding Leads meetings and through e-bulletins or taking time to read and digest safeguarding developments.

They will also undertake Prevent awareness training.

15.3 Trustees

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

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

15.4 Recruitment – interview panels

At least 1 person (ideally all on the panel) conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See the TLP Safer Recruitment Policy for further information.

15.5 Staff who have contact with pupils and families

Schools will need to explore how staff who have contact with children and families, and challenging safeguarding issues, can be supported through a supervision process which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

16. Monitoring arrangements

This policy will be reviewed annually by the DIS in collaboration with the school DSLs. At every review, it will be approved by the full board of trustees.

Twice a term the school will complete a Safeguarding Dashboard. Once a term they will complete a review form which will be collated by the DIS who will then report to Trustees.

The Designated Safeguarding Lead will monitor the operation of this policy, its procedures and implementation and ensure they are updated and reviewed regularly.

The Tarka Learning Partnership Trust Board will ensure that any deficiencies or weaknesses in regard to child protection arrangements are remedied without delay.

17. Other considerations

17.1 Teaching and Learning

TLP recognises the importance of learning and understanding in the safeguarding process. The design and implementation of an appropriate curriculum is a key element of effective safeguarding.

Personal, Social and Health Education (PSHE) can be an effective way of providing pupils with time to explore sensitive or controversial issues, and equipping them with the knowledge and skills to understand and manage difficult situations. Pupils can be supported to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. They can also develop effective ways of resisting pressures, including knowing when, where and how to get help. Schools can encourage pupils to develop positive character traits through PSHE, such as resilience, determination, self- esteem, and confidence.

Citizenship helps to provide pupils with the knowledge, skills and understanding to prepare them to play a full and active part in society. It can equip pupils to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. In Citizenship, pupils learn about democracy, government and how laws are made and upheld.

School will keep the curriculum under constant review to ensure that it promotes knowledge, skills and understanding to build the resilience of students, and undermines extremist ideologies and supports the learner voice. This will be achieved through:

• Embedding equality, diversity and inclusion, wellbeing and community cohesion in the curriculum

• Promoting wider skills development such as social and emotional aspects of learning

• Adapting the curriculum to recognise local needs and issues, challenge extremist narratives and promote universal rights

• Using teaching and learning strategies which explore controversial issues in a way which promotes critical analysis (where age appropriate);

• Using external programmes or groups to support learning while ensuring that the input supports school goals and values;

• Encouraging active citizenship and pupil voice.

17.2 Pupil Support

To ensure that pupils are protected, it is important to have in place good pastoral and support systems that support the most vulnerable. This should include:

- Having clear lines of communication and support presented to all children in such a way that all children have access to a trusted adult.

- Maintaining strong and effective additional needs support services with staff who have thorough understanding of the safeguarding pressures including the Prevent agenda

- Listening to what is happening in the school and the community and actively engaging in the local forums including Prevent strategy working groups

- Implementing anti-bullying strategies and challenging discriminatory behaviour

- Helping parent/carers and staff know how to access support in school and or through community partner

- Maintaining good communication links with parent and carers, and discussing any concerns with them

- Supporting 'at risk' pupils through safeguarding and crime prevention processes.

Appendix 1: Types of abuse (ref to: Department for Education's statutory guidance, Keeping Children Safe in Education KCSIE).

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

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in

all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

- Seeing or hearing the ill-treatment of another

- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- Protect a child from physical and emotional harm or danger

- Ensure adequate supervision (including the use of inadequate care-givers)

- Ensure access to appropriate medical care or treatment

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

Appendix 2: safer recruitment and DBS checks – policy and procedures
Recruitment and selection process

The Tarka Learning Partnership pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' Part 3 including scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks, dependent on the role and duties performed, including regulated and non-regulated activity (see KCSIE 2022). In addition it will also carry out online searches for shortlisted candidates to help identify any issues that are publicly available online.

All recruitment materials will include reference to the Tarka Learning Partnership's commitment to safeguarding and promoting the wellbeing of pupils. The school will undertake a risk assessment and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. (Full details are set out in the TLP Safer Recruitment Policy)

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

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

- There are concerns about an existing member of staff's suitability to work with children; or

- An individual moves from a post that is not regulated activity to one that is; or

- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in relevant conduct; or

- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

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

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

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

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

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

Where required by the relevant legislation: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Where required by the relevant legislation: In both cases, this includes checks to ensure that

individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

- Where required by the relevant legislation: Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Trustees, members

All trustees, local governors and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008)

- Identity

- Right to work in the UK

- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. For those establishments not registered we will hold this information our own SCR

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.
Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff

This area is covered in the TLP Managing Allegations of abuse against staff policy and procedure. This includes:

- Allegations that may meet the harms threshold

- Possible suspension of the accused until the case is resolved

- Definitions for outcomes of allegation investigations

- Procedure for dealing with allegations

- Timescales

- Specific actions

- Confidentiality and information sharing

- Record-keeping

- References

- Learning lessons

- Non-recent allegations

- Concerns that do not meet the harm threshold

- Definition of low-level concerns

- Low-level concerns

Appendix 4: specific safeguarding issues

Within KCSIE Annex B includes information on further safeguarding issues to be aware of. As part of ongoing training these issues will be explored and understanding developed through regular staff updates and briefing in addition to more formal safeguarding training. It will be for the DSL and the Head Teacher to coordinate this professional development across the school year to ensure that key issues are covered in response to the needs of the school.

The following are areas are taken from the present KCSIE update with explanations, actions and support identified.

1. *Children missing from education*

2. *Child criminal exploitation*

3. *Child Sexual exploitation*

4. *Child on child abuse*

5. *Domestic abuse*

6. *Homelessness*

7. *Honour based abuse and FGM*

8. *Preventing radicalisation*

9. *Serious violence*

10. *Checking the identity and suitability of visitors*

11. *Non collection of children*

12. *Contextual safeguarding*

1. Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

- Are at risk of harm or neglect

- Are at risk of forced marriage or FGM

- Come from Gypsy, Roma, or Traveller families

- Come from the families of service personnel

- Go missing or run away from home or care

- Are supervised by the youth justice system

- Cease to attend a school

- Come from new migrant families

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

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

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

2. Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions

- Associating with other young people involved in exploitation

- Suffering from changes in emotional wellbeing

- Misusing drugs and alcohol

- Going missing for periods of time or regularly coming home late

- Regularly missing school or education

- Not taking part in education

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

3. Child sexual exploitation

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

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

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

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

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

- Having an older boyfriend or girlfriend

- Suffering from sexually transmitted infections or becoming pregnant

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

4. Child-on-child abuse

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

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

- Abuse in intimate personal relationships between peers (this is sometimes known as 'teenage relationship abuse')

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse. When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them

- Regularly review decisions and actions, and update policies with lessons learnt

- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

5. Domestic abuse

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

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

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#)

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

6. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
The DSL and DDSLs will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

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

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

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

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

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

FGM mandatory reporting duty for teachers

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. For further information FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf (publishing.service.gov.uk)

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place

- A mother/family member disclosing that FGM has been carried out

- A family/pupil already being known to social services in relation to other safeguarding issues

- A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable

- Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating

- Having frequent urinary, menstrual or stomach problems

- Avoiding physical exercise or missing PE

- Being repeatedly absent from school, or absent for a prolonged period

- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

- Being reluctant to undergo any medical examinations

- Asking for help, but not being explicit about the problem

- Talking about pain or discomfort between her legs

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

   - The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

   - FGM being known to be practised in the girl's community or country of origin

   - A parent or family member expressing concern that FGM may be carried out

   - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

   - A girl:

- Having a mother, older sibling or cousin who has undergone FGM

- Having limited level of integration within UK society

- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

- Being unexpectedly absent from school

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage
Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place

- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

8. Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

- **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;

- Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate - Prevent Radicalisation & Extremism](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

- Becoming susceptible to conspiracy theories and feelings of persecution

- Changes in friendship groups and appearance

- Rejecting activities they used to enjoy

- Converting to a new religion

- Isolating themselves from family and friends

- Talking as if from a scripted speech

- An unwillingness or inability to discuss their views

- A sudden disrespectful attitude towards others

- Increased levels of anger

- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions

- Accessing extremist material online, including on Facebook or Twitter

- Possessing extremist literature

- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

9. Serious violence

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

- Increased absence from school

- Change in friendships or relationships with older individuals or groups

- Significant decline in performance

- Signs of self-harm or a significant change in wellbeing

- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

- Being male

- Having been frequently absent or permanently excluded from school

- Having experienced child maltreatment

- Having been involved in offending, such as theft or robbery

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

10. Checking the identity and suitability of visitors

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

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

Visitors are expected to sign the visitors' book and wear a visitor's badge / lanyard – this must be returned and checked in at the end of the visit.

Professionals who are visiting, such as educational psychologists and school improvement officers, will be asked to show photo ID (see TLP DBS policy) and managed using the Contractor policy and safeguarding guidelines, including:

- *Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or*

- *The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)*

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

11. Non-collection of children

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

Phone parents
Phone any other contacts for the child we hold on Bromcom
We will try the contacts and leave messages where possible
We will wait an appropriate amount of time
If no response from any contact and no information has been received we would contact MASH/social services

12. Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside the school or college. All staff, but especially the Designated Safeguarding Lead (or Deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional

information regarding contextual safeguarding is available here: [Contextual safeguarding | NSPCC Learning](#)

Appendix 5 - Further considerations

1. Reasonable Restraint

All academies/schools will have a selection of staff trained in Positive Handling (PIPs) and will record any incidents that occur in Bound and Numbered books or CPOMS. A designated member of staff in each academy/school will be responsible for monitoring and signing off all recorded incidents. All staff will know where the bound and numbered book is kept or how to sign onto CPOMS and when they are required to complete an incident form.

2. Communicating Safeguarding Messages with Staff, Parents, Pupils, SCBs, Visitors, Trustees

Schools will publish a range of materials to support key messages about Safeguarding: -

- Staff training and safeguarding updates

- Staff handbooks/safeguarding publications

- Notices with photographs of safeguarding school/ academy personnel

- Annual issue of KCSIE

- Annual update of this policy

- Child Line posters and other relevant posters suited to context of the school i.e. age range

- Pupil safeguarding updates

Appendix 6 Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
School Designated safeguarding lead (DSL)	Lizzy Toon	lizzy.toon@roundswell.tarkarust.org.uk
Deputy DSL	Kate Fairbrother	Kate.fairbrother@roundswell.tarkatrust.org.uk
Director of Inclusion & Safeguarding	Chris Wardle	admin@tarkatrust.org.uk
Local authority designated officer (LADO)	Devon's LADO	01392384964
Chair of Trustees	Graham Cockell	admin@tarkatrust.org.uk
Channel helpline		020 7340 7264

Local Authority Contact Information
Ensure any concerns that a child is at risk of harm is reported to social care or the police.

Devon MASH - 0345 1551071

Or contact the police – 999 emergency /101 non emergency

If a child is open to social care, ensure that any concerns are reported to the allocated social worker. If you are unsure of who the allocated social worker is contact local social work teams on the following numbers:

Devon – 0345 155 1078

MARAC
What is a MARAC?

A MARAC, or multi-agency risk assessment conference, is a meeting where information is shared on the highest risk domestic abuse cases between representatives of local police, probation, health, child protection, housing practitioners, Independent Domestic Violence Advisors (IDVAs) and other specialists from the statutory and voluntary sectors. After sharing all relevant information about a victim, representatives discuss options for increasing safety for the victim and turn these options into a co-ordinated action plan. The primary focus of the MARAC is to safeguard the adult victim.

The Devon MARACs have also established a firm link with the Devon MASH through a new dual referral form to ensure that there is appropriate consideration of safeguarding children. For more information about the new combined MARAC Referral and MASH Enquiry Form please click here. The MARAC will also make links with other fora to safeguard children and manage the behaviour of

the perpetrator. At the heart of a MARAC is the working assumption that no single agency or individual can see the complete picture of the life of a victim, but all may have insights that are crucial to their safety. The victim does not attend the meeting but is represented by an IDVA who speaks on their behalf.

MARAC contact: North Devon and Torridge 01271 335380
Devonbcudaonorth@devonandcornwall.pnn.police.uk

For more information about MARAC, please visit MARAC - Domestic and Sexual Violence and Abuse (devon.gov.uk)

CAADA is a national charity supporting a strong multi-agency response to domestic abuse.

If you suspect Domestic Abuse you can complete a DASH RIC (A Risk Identification Checklist) and a MARAC referral. Link to MARAC | Domestic and Sexual Violence and Abuse

A Risk Identification checklist link is below: NI Dash with guidance FINAL.pdf (safelives.org.uk)
Devon's domestic abuse helpline 0345 155 1074

For North Devon Against Domestic Abuse NDADA NDADA - We provide temporary refuge to women
Rape crisis helpline 0808 802 9999

If there is an immediate risk of significant harm ring the Police on 999 The following telephone numbers may be useful for pupils:

Police Child Abuse Investigation Team: 0845 456 7000

Child line: 0800 1111

NSPCC: 0808 800 5000

Appendix 7: Referral Process to Multi Agency Safeguarding Hub (MASH)

Initial non-emergency child safeguarding concerns should be dealt with through the Designated Safeguarding leader or Deputy in the school. The DSL or Deputy will consider whether or not to contact MASH – Multi Agency Safeguarding Hub

When to contact The MASH

If you are worried about a child or young person in Devon and want to speak to someone, or if you are a child or young person worried about your own safety please contact the MASH on 0345 155 1071 or email mashsecure@devon.gov.uk

Confidentiality is very important and each agency ensures that the information shared is relevant and proportionate, it is always important that the consent of the parent is given to any enquiry to enable information sharing within the MASH, an exception to this would be should seeking that consent place a child or others at increased risk. Report a child safety concern - Devon Children and Families Partnership (dcfp.org.uk)

Consider requesting a consultation with a MASH social worker to enable you to talk through concerns and consider if a MASH referral is appropriate.