NORTH STAR
COMMUNITY TRUST

Woodpecker Hall
ACADEMY

Safeguarding,

Child Protection

and associated procedures

NsctPol / WHA / 0017

Safeguarding, child protection and associated procedures

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The term ‘staff’ refers to all staff on site including ancillary, agency and supply staff, students on placement, contractors who work with children, Governors, Trustees and volunteers working with children.

The term ‘child’ / ‘children’ includes everyone under the age of 18 however any pupil older than 18 but still on roll at a school would be included in scope of our policies

APPENDIX 1

Designated and deputy designated safeguarding leads (and support)

Enfield Heights ACADEMY **020 8805 9811** heights@northstartrust.org.uk	**DSL** **Justyna Powrie** Head teacher **DDSL** **Ashan Venn** Deputy Head teacher Supported by the Trust Central Safeguarding Team
Heron Hall ACADEMY **020 8443 9631** heron@northstartrust.org.uk	**DSL** **Stephanie Simpson** Deputy head teacher **DDSL** **Arthur Barzey** Head teacher **DDSL** **Lois Burgess** SEND Co-ordinator Supported by additional trained members of SLT, Heads of Year and the Trust Central Safeguarding Team
Kingfisher Hall ACADEMY **020 8344 9890** kingfisher@northstartrust.org.uk	**DSL** **Gemma Vincent** Head teacher **DDSL** **Havva Ayer** Deputy head teacher **DDSL** **Olivia Stuart** Assistant head teacher Supported by the Trust Central Safeguarding Team
Woodpecker Hall ACADEMY **020 8804 4126** woodpecker@northstartrust.og.uk	**DSL** **Nicky Ross** Head teacher **DDSL** **Amy Donovan** Deputy head teacher **DDSL** **Rosanna Ojosipe** Deputy head teacher Supported by additional trained members of SLT and the Trust Central Safeguarding Team
NORTH STAR COMMUNITY TRUST CENTRAL SAFEGUARDING TEAM **07701 009 319** **020 8804 4126** (Ext. 620, 623, 627) **020 8843 9631** (Ext. 621)	**DSL** **Zoe Kirby** Head of Safeguarding **DDSL** **Ellie Watkins** Safeguarding Officer **DDSL** **Jade Tomkinson** Safeguarding Officer **Lisa Green** Safeguarding Support Officer

Other important contacts

Enfield's Multi Agency Safeguarding Hub (MASH)	020 8379 5555 / 020 8379 1000 (Out of hours)
Local Authority Designated Officer (LADO)	020 8379 2850 **Bruno Capela**
Enfield Local Authority Virtual School Head	020 8132 0336 **Suzanne Rowson**
Enfield Local Authority PREVENT Co-ordinator	020 8379 6137 **Suj Ponampalam**
'Prevent' Education Officer	020 4526 7102 **Maddie Street**
NSPCC | Sexual abuse helpline	0800 136 663 help@nspcc.org.uk
NSPCC | Whistleblowing helpline	0800 028 0285

Safeguarding children

1. Introduction

1.1 Woodpecker Hall Academy's safeguarding policy is embedded into the general ethos of all the academies forming part of North Star Community Trust (NSCT), which is to ensure that our pupils are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to. All staff members should make sure their approach is child centred and that they should consider at all times what is in the best interest of the child.

1.2 This policy has been developed in line with Keeping Children Safe in Education 2024, Working together to Safeguard Children 2023 and additionally has been written to not only reflect the particular needs of the primary and secondary pupils in the community which we serve, but to also allow fluidity of / additional safeguarding and child protection support across our schools by ensuring all NSCT Academies staff are familiar with its requirements.
www.gov.uk/government/publications/keeping-children-safe-in-education--2
www.gov.uk/government/publications/working-together-to-safeguard-children--2

1.3 The Trustees, Governors and staff of our academies fully recognise the contribution they make to safeguarding children. We recognise that all members of staff, including volunteers, have a full and active part to play in protecting our pupils from harm. Safeguarding is everyone's responsibility.

1.4 All Trustees, Governors and staff believe that our academies should provide caring, positive safe and stimulating environments which promote the social, physical, mental health and moral development of the individual child.

1.5 We recognise that safeguarding includes online safety both inside and outside of the school community. Our separate online safety policy can be found on the policy page of our website. www.woodpeckerhallacademy.org.uk/Policies

1.6 When considering the safeguarding needs of looked after children, this policy should be read in line with our looked after children policy which can be found on the policy page of our website. www.woodpeckerhallacademy.org.uk/Policies

1.7 We recognise that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges (both on and offline, inside and outside of school)

1.8 We recognise that children being absent from education for prolonged periods and / or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation (particularly county lines We also recognise that children being absent or keen to be at home could mean they are witnessing domestic abuse and that children observing this behaviour are victims in their own right

1.9 Where staff may have concerns that polices or procedures are not being correctly administered, they are encouraged to formally raise this with their line manager and are also made aware of our whistleblowing policy which is available to them on our website and intranet.

1.10 The term 'staff' refers to all staff on site including ancillary, agency and supply staff, students on placement, contractors who work with children, Governors, Trustees and volunteers working with children.

1.11 The term 'child' / 'children' includes everyone under the age of 18 (however any pupil older than 18 but still on roll at a school would be included in scope of our policies)

1.12 As per our lettings policy we ensure that any organisations or individuals hiring our premises have appropriate safeguarding arrangements in place. Whilst our safeguarding procedures will apply to those attending any activities or services we directly manage (regardless of whether those attendees are known to us) we may consider any concern raised about individuals on our premises in line with our procedures if we feel it is appropriate to do so.

2. The aims of this policy are:

2.1 To support children's development in ways that will foster security, confidence and independence.

2.2 To raise the awareness of both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

2.3 To provide a systematic means of monitoring children known or thought to be at risk of harm.

2.4 To emphasise the need for good levels of communication and reporting between all members of staff.

2.5 To maintain a structured procedure which is followed by all members of the school community where abuse is suspected.

2.6 To continue to promote effective working relationships with other agencies, especially the Local Safeguarding Partnership of Police, Children's Social Services and the North Central London Integrated Care System

2.7 To ensure that all adults within our school who have contact with children have been checked as to their suitability as part of the recruitment and selection process in line with 'safer recruitment' recommendations and our safer recruitment procedures which include appropriate online and social media searches.

3. Procedures

Our procedures for safeguarding children will comply with the Safeguarding Enfield Partnership procedures. www.enfield.gov.uk/enfieldlscb who have in turn have adopted and follow the London Child Protection Procedures new.enfield.gov.uk/enfieldlscb/protocolsandprocedures

We will ensure that:

3.1 We have a named safeguarding lead supported by designated members of staff who undertake regular training every two years and regularly update their knowledge and skills. The safeguarding team is clearly identified and all staff are aware. (Please see **APPENDIX 1** for named contacts across our academies)

3.2 All members of staff develop their understanding of the signs and indicators of abuse, neglect and exploitation, online safety expectations, roles and responsibilities in relation to filtering and monitoring and they refresh their training regularly.

3.3 Our academies are aware that additional barriers exist when recognising possible abuse, neglect and exploitation of pupils with additional susceptibilities e.g. a disability, any special educational need, a young carer, those at risk of being drawn into anti-social or criminal behaviour, those who are Lesbian, Gay, Bisexual or Gender Questioning (or perceived to be), those who go missing from home or care or those in a family circumstance presenting challenges to the child (e.g. those with a family member involved in offending or in prison or those subject to a private fostering arrangement or those who are care leavers). Our training prepares staff to recognise and respond to the additional susceptibilities of these pupils including where we should or must provide additional information to the local authority.

3.4 All members of staff are trained in how to respond to a pupil who discloses abuse.

3.5 Parents / carers are made aware of the responsibilities of staff members with regard to child protection procedures.

3.6 Concerns, case management discussions and decisions made and the reasons for those decisions will be recorded. This information will be shared only with staff who need to know and will be stored securely on our electronic reporting tool (CPOMS).

3.7 Staff understanding of their responsibilities is monitored through regular training throughout the academic year including knowledge checks and regular updates

3.8 All staff will have read the Government Guidance, *Keeping children safe in education (part 1).* This guidance contains and refers to specific safeguarding issues and provides links to further information www.gov.uk/government/publications/keeping-children-safe-in-education--2

3.9 All staff are required to have read the school safeguarding and child protection policy.

3.10 All new members of staff (and existing staff on an annual basis) will be, depending on their role, required to confirm they have read and understood either: -

Required reading: -	For those who: -
Keeping Children Safe In Education 2024: Part 1 **or** Annex A of Keeping Children Safe In Education 2024	do not work directly with children
Keeping Children Safe in Education 2024: Part 1 **and** Annex B of Keeping Children Safe In Education 2024	work directly with children
Keeping Children Safe In Education 2024	have designated safeguarding roles

www.gov.uk/government/publications/keeping-children-safe-in-education--2

3.11 Staff will be made aware of our child protection procedures (Please see **APPENDIX 3**)

3.12 All staff will participate in whole staff training each September (or at appropriate catch-up sessions throughout the year) to be delivered by the Head of Safeguarding or safeguarding team

3.13 Safeguarding is a standing agenda item for Governors at our termly Academy Advisory Committee (AAC) meetings. At least one Governor will be assigned the lead remit of safeguarding.

3.14 The Trust's Board will ensure at least one Trustee is assigned the lead remit of safeguarding.

3.15 Our procedures will be regularly reviewed and up-dated.

4. Responsibilities

4.1 As per Paragraph 57 of Keeping Children Safe in Education 2024, where a child is suffering or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate, the police) is made immediately.

All staff must: -

- maintain an attitude of "*it could happen here*" where safeguarding is concerned
- always act in the best interests of the child with a child centred approach
- build a trusting relationship with children so they feel able to talk to an adult when they have a concern and when they are ready to do so and be mindful that children may not necessarily choose to disclose to an adult they are in regular contact with.
- always seek the voice of the child when discussing concerns with them and help them overcome potential barriers to having their voce heard (such as a special educational need, disability, language barrier or sexual orientation)
- immediately act on any concerns they have about a child's welfare

The designated safeguarding staff teams are responsible for: -

Managing referrals

4.1.1 refer cases of suspected abuse, neglect and exploitation to the local authority children's social care as required;

4.1.2 support staff who make referrals to local authority children's social care;

4.1.3 refer cases to the Channel programme where there is a radicalisation concern as required;

4.1.4 support staff who make referrals to the Channel programme;

4.1.5 refer cases where a person is dismissed or left due to risk / harm to a child to the Disclosure and Barring Service and the Teaching Regulation Agency as required; and

4.1.6 refer cases where a crime may have been committed to the police as required.

Working with others

4.1.7 act as a point of contact with our safeguarding partners (see section 2.6 above) ensuring our policy reflects the local criteria for action and the local protocol for assessment;

4.1.8 liaise with the head teacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;

4.1.9 as required, liaise with the Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a staff member;

4.1.10 liaise with other staff / agencies (especially pastoral support staff, school nurses, IT technicians, SENDCOs and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) when deciding whether to make a referral by so that a child's needs are considered holistically;

4.1.11 ensure the voice of the child is listened to and considered in relation to any concerns raised;

4.1.12 act as a source of support, advice and expertise for all staff.

Keeping records

4.1.13 Adhering to the Enfield Safeguarding Children's Partnership and academy procedures with regard to referring a child if there are concerns about possible abuse.

4.1.14 Keeping written records of concerns about a child even if there is no need to make an immediate referral.

4.1.15 Ensuring that all such records are kept confidentially, securely and separate from pupil records.

4.1.16 Ensuring that *Children's Services Referral and Assessment Team* are made aware of any information pertaining to any pupils who currently have a social worker or when responding to attendance concerns and considering the provision of pastoral or academic support which indicates that their level of risk has increased.

4.2 **All** members of staff (paid and unpaid) have the statutory responsibility to safeguard and promote the welfare of children and receive training in what to do if a child tells them that he or she is being abused or neglected.

4.3 All staff receive training around the local early help process and their role in it as well as the process for making referrals to children's social care and the role that they may be asked to play in section 17 or section 47 assessments.

4.4 All staff must be aware that they must not assume a colleague or another professional will take action and that they must share information that might be critical in keeping a child safe

4.5 All staff are made aware through regular training of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

5. Supporting children

5.1 We recognise that: -

- a child who is abused or is a witness to violence (including domestic violence) may find it difficult to develop and maintain a sense of self-worth
- a child in these circumstances may feel helpless and / or humiliated.
- a child may feel self-blame.
- a child may not recognise their experiences as abuse
- online safety is a key part of safeguarding our pupils as young people often don't see the internet as a separate part of their lives.

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

5.3 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

5.4 Our academies will support all pupils by:

5.4.1 Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying.

5.4.2 Promoting a caring, safe and positive environment within the school where children are encouraged to talk about their wishes and feelings in order that they can confidently report abuse knowing that their concerns will be treated seriously and that they can safely express their views and give feedback.

5.4.3 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.

5.4.4 Giving consideration to the contextual safeguarding issues our demographic and surrounding areas may bring

5.4.5 Notifying Children's and / or Adult's Social Services as soon as there is a significant concern.

5.4.6 When a pupil about whom there are ongoing or recent concerns leaves an academy, we will provide them with continuing support by ensuring that appropriate information is securely and confidentially forwarded to the pupil's new school.

5.4.7 Where we have placed a child with an alternate provision provider, we will continue ro be responsible for the safeguarding of that child and will ensure the placement meets the needs of our children.

5.5 We recognise that children on work experience or those who are volunteers may also need appropriate safeguarding support.

6. Children and the court system

6.1 We recognise that children may sometimes be required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

The following national guidance is available: -

- Young witness booklet for 5 – to 11 year olds
  www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds
- Young witness booklet for 12 – to 17 year olds
  www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds

6.2 Additionally making child arrangements via the family courts following separation can sometimes be stressful and entrench conflict in families as well as be stressful for children

The following guidance is available from the ministry of justice with regard to information on the dispute resolution service: -

- Get help with child arrangements
  https://helpwithchildarrangements.service.justice.gov.uk/

7. Confidentiality

7.1 We recognise that all matters relating to Child Protection are confidential in addition to our duty to comply with and protect the rights of individuals' personal data under GDPR and the Data Protection Act 2018. Consideration will be given to when and how it is appropriate to share information to ensure effective working to protect children.

7.2 The Head teacher or designated member of staff will only disclose information about a pupil to other members of staff on a '*need to know*' basis where it is appropriate in order to support and protect the child effectively.

7.3 All staff must be aware that they have a professional responsibility to share information with other agencies where it is necessary in order to safeguard children.

7.4 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

8. Supporting staff

8.1 We recognise that staff working in our academies who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

8.2 We will support such staff by providing an opportunity to talk through their anxieties with an appropriate member of staff and will seek further support as appropriate. The Trust's '*Health Shield*' schemes is also available to our employees to provide independent support.

9. Key safeguarding focus areas for our school

9.1 We recognise that the safeguarding priorities for our school may change over time, given the context of our children and the local community. For the academic year 2024-2025, we have identified that the key priorities will include: -

- Child on Child Abuse (including HSB (Harmful Sexual Behaviours))
- Domestic Abuse in keeping with the changes of KCSIE 2023 of recognising that children witnessing or living with Domestic Violence are victims in their own right
- Online safety in school and out in the community
- Embedding Culture
- PREVENT

Child protection procedures

There are essentially four key steps to remember and this procedure explains them. They are referred to as the **4 Rs**:

- **Recognising** abuse, neglect and exploitation (including concerns around peer on peer abuse)
- **Responding** to the concerns
- **Referring** concerns on
- **Recording** any actions taken and outcomes.

Members of our academy workforce could have their suspicion or concern raised in a number of ways, the most likely of which can be one or more of the following:

- A child 'disclosing' abuse
- Bruising or evidence of physical hurt
- Unusual behaviour by a child
- The conduct of a member of the academy's workforce

Concerns about a specific child should be reported immediately to a member of the Designated Safeguarding Team (See **APPENDIX 1**) and confirmed in writing within 24 hours.

Reports should usually be made using the *CPOMS* portal, but direct contact with a member of the safeguarding team by phone, email or face-to-face can also be made if the portal is for any reason unavailable to the member of staff.

Where the situation is urgent and a delay could endanger or cause increased risk to a child or could result in evidence being lost, staff should make direct contact with the Designated Safeguarding Team to make them aware that the report will follow.

If a child is suffering from harm, likely to suffer from harm or is in immediate danger contact with children's social care (and the police, if appropriate) should be made immediately.

A referral to the Enfield Children's MASH can be made by any staff member by accessing the Children's Portal on the Enfield website or by calling **0208 379 5555**. This should be reported to the DSL team as soon as possible (who can also make the referral on your behalf).

https://new.enfield.gov.uk/services/children-and-education/childrens-portal/

All staff are aware that ***any*** delay could prejudice the welfare of a child.

How to respond to a disclosure by a child

- Stay calm.
- Listen carefully to what is said.
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others (i.e. **do not promise to keep secrets**)
- Tell the child that the matter will need to be shared but will only be disclosed to those who need to know about it.
- Allow the child to continue at their own pace.
- Ask questions for clarification only, and at all times avoid asking leading questions.
- Avoid closed questions / Use open questions e.g. TED (Tell, Explain, Describe)
- Reassure the child that they have done the right thing in telling you.
- Tell them what you will do next, and with whom the information will be shared.
- Using the child's own words, record in writing what was said as soon as possible after the event – note the date, time, location of discloser, any names mentioned, to whom the information was given and ensure that the record is signed and dated.

It is important to remember that the person who first encounters a case of alleged abuse, neglect or exploitation is not responsible for deciding whether it has occurred. That is a task for the professional child protection agencies, following consideration and referral from the Designated Safeguarding Team

Action staff must take immediately when a concern arises

1. Report the concern immediately to the Designated Safeguarding Team (See **APPENDIX 1**). They will then determine the next steps to take, including consultation with other professional agencies (e.g. Enfield Children's MASH) in order to determine the best course of action. Consideration will need to be given as to whether the concern involves an immediate risk of significant harm, a clear allegation of abuse, neglect or exploitation by the child, or does not involve an immediate risk of significant harm.

2. It is not the responsibility of any member of academy staff (including the Designated Safeguarding Team) to determine if abuse, neglect or exploitation has taken place; rather they are responsible for reporting on their concerns to the appropriate authorities.

3. Concerns that are anonymous or that relate to historical concerns (e.g. relating to previous staff or an incident that happened some time ago) should not be ignored and must be reported to the Designated Safeguarding Team.

4. A record of the concern will be held and may be shared or used for the purposes of tackling abuse, neglect or exploitation and promoting the welfare of the child.

5. Remember - do not delay reporting the matter by trying to obtain more information.

6. You should **never** remove clothing in order to examine the child where they are alleging injuries unless there is a clear need to do so in order to administer first aid.

7. Remember – some children have an increased risk of abuse, neglect or exploitation both on and offline

Information Sharing and the Child Protection File

Records regarding concerns and their follow up and resolution including actions taken, decisions and the outcomes will be stored securely and separately from the child's original school file. The information contained in these records will only be shared with staff who need to know in order to safeguard the child and others.

Where children leave the school, the designated safeguarding team will ensure that the safeguarding and / or child protection files are transferred to the receiving school as soon as possible and within five days for an in-year transfer or within the first five days of the start of a new term. Confirmation of receipt will be requested.

Early help assessment process guide

Introduction

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

The school community will therefore: -

- Ensure and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Ensure that all children, parents and carers know there are adults in the school whom they can approach if they are worried or in difficulty.
- Include in the curriculum opportunities for PSHE which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.

Our regular safeguarding case management meetings are utilised to identify and support susceptible children who may need additional support either in school or through accessing early help services.

Early help assessment process

Our academies recognise the importance of effectively using the early help assessment process to access support for children and their families and we recognise that every person whose role involves working with children and young people needs to be prepared and able to recognise the need for support. We aim to use the early help assessment process to identify and provide the appropriate support for individual pupils and help early identification.

We use the early help assessment process when: -

- There is a concern about a child's health, welfare, progress in learning or other aspect of their wellbeing
- A child's needs are unclear, different from the norm and / or broader than the school can address

Using an early help assessment process will help identify a child's needs and / or get other services involved to help meet them. The elements that form the Early Help Framework will include collecting together and sharing information about all the following areas: -

- general health
- physical development
- speech, language and communication development
- emotional and social development
- behaviour development
- self-esteem, self-image and social presentation
- family and social relationships
- self-care skills and independence

- learning, including: understanding, reasoning and problem-solving, progress and achievement in learning, participation in learning, educational aspirations
- basic parental care, including safety and protection
- emotional warmth and family stability
- parental guidance, behaviour boundaries and stimulation at home
- family history, including functioning and wellbeing
- wider family
- housing and financial considerations
- social and community factors

Any child may benefit from the early help but (in line with Working together to safeguard children 2023) as a Trust we are particularly alert to the potential need for early help for a child who: -

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- 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 or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and / or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Completing the assessment

It may be necessary to complete an early help assessment on a pupil at any time. The decision to carry out the assessment will usually be taken jointly with the relevant staff and a member of the senior leadership team (SLT) or safeguarding team, the pupil (where appropriate) and parent / carers using the following guidelines: -

1. Any concerns will be discussed with the pupil (where appropriate), parents and other agencies already involved with the child. (If a parent refuses to cooperate we will clearly record that

agreement to complete the EHF has been refused.) Where we are concerned about a child's welfare or safety we will seek immediate advice from Children's MASH or refer on safeguarding grounds via the Children's Portal.

2. A number of agencies may take the lead role in co-ordinating help for families at this level including education, welfare, health, schools early help team services (parent support unit, change and challenge team, children's centres) or agencies such as the behaviour support service (SWERL) or CHEVIOTS the joint service for disabled children.

Policy on safeguarding young people at risk of so called 'honour based' abuse including forced marriage and female genital mutilation

Forced marriage

Forced marriage should not be confused with an arranged marriage. Parties within an arranged marriage have the choice to accept the arrangement or not. The tradition of arranged marriages has operated successfully within many communities and countries for a very long time.

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage.

It is illegal to cause a child under the age of 18 to marry even if violence, threats or coercion are not used.

Schools and colleges can play an important role in safeguarding children from forced marriage.

Awareness of the issue of forced marriage is raised through our regular safeguarding training. If staff are worried that they, or someone else, might be forced into marriage we encourage them to speak to the safeguarding team who can signpost them to appropriate support. (See **APPENDIX 1**)

The national Forced Marriage Unit (FMU) can also be contacted for advice.
020 7008 0151
www.gov.uk/stop-forced-marriage

So called 'honour based' abuse

There is no honour in threatening or harming others with violence. A small number of women and men experience violence of threats from their family or community to protect perceived family "honour".

So called 'honour based' abuse (HBA) encompasses incidents or crimes that have been committed to protect or defend the honour of the family and or community and this can include female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider family or community pressure and can include multiple perpetrators.

All forms of honour based abuse is abuse (regardless of motivation) and should be handled and escalated as such. There is no justifiable religious or cultural basis to this abuse. It is a crime and must be treated as such.

Members of the school community who are in fear of this kind of violence or believe that someone may be suffering may not always recognise the seriousness of the situation or may not come forward as they are too frightened or feel disloyal to their family or community for speaking out. We take

these issues seriously and addresses them during regular staff training. All staff members are encouraged to report any concerns to the safeguarding team who will look to provide sensitive and appropriate support at every stage of the process and can contact agencies that offer advice and support. (See **APPENDIX 1**)

Warning signs of possible so called honour based violence

- Broken communication between the victim and friends
- Absence from education / the workplace
- Criticism of the victim for "western" adoption of dress / make up
- Restrictions in leaving the house or being accompanied outside the home
- Depressive or suicidal tendencies in an otherwise happy person

Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 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 may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out as per Paragraph 42 and page 161 of Keeping Children Safe in Education 2024

Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate.

If any of the above concerns are brought to the attention of any of our designated child protection teams, they will be immediately reported to the Local Authority's Children's Services.

Indicators that FGM may have taken place include:

- Family comes from a community that is known to practice FGM
- Girls and young women who are British citizens but whose parents were born in countries that practice FGM, may also be at risk.
- Having returned from a holiday in a country known to practice FGM, a girl or young woman presents as suffering emotional / psychological effects (e.g. withdrawal, depression etc) or physical effects (e.g. unable to properly sit in a chair) of undergoing FGM.

- A girl or young woman regularly spends time out of class or from other activities with bladder or menstrual problems etc.

- A girl or young woman requiring to be excused from PE without the support of her GP doctor.

Indicators that FGM may be about to take place include:

- A family from a country known to practice FGM is known to be planning a holiday to a country known to practice FGM;

  and particularly where: -

- A girl or young woman expressing anxiety about a special procedure or a special occasion which may include discussion of a holiday to their country of origin;

- A girl or young woman may refer to FGM either in relation to themselves or another family member or friend;

- A girl or young woman requesting help to prevent it happening;

- Others may indicate some concern about a girl or young woman

Support and information can also be obtained from

The Agency for Culture and Change Management (ACCM)

www.accmuk.com

Tel: 01234 356 910

Child on child abuse including child on child sexual violence and sexual harassment as well as up-skirting

We recognise that abuse is abuse. We take a zero tolerance approach to all abuse (including transphobia). It is never acceptable for abuse to be tolerated or passed off as "*banter*", "*just having a laugh*", "*part of growing up*" or "*boys being boys*"

Child-on-child abuse

We recognise the gendered nature of child-on-child abuse and are aware that not only are females at higher risk of experiencing it, but also that children who are (or are perceived to be) lesbian, gay bisexual or gender questioning can also be particularly susceptible as well as SEND pupils being three times more likely to be abused by peers.

All child-on-child abuse is unacceptable and will not be tolerated as we create a safe environment for our children. A victim is never causing a problem by reporting abuse and a victim should never be made to feel ashamed for making a report of harassment or violence. Child-on-child abuse includes but is not limited to: -

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children;
- 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);
- physical behaviour (such as grabbing bottoms / breasts / genitalia, pulling down trousers, flicking bras, lifting skirts)
- 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) and causing someone to engage in sexual activity without consent.;
- sexual harassment (i.e.unwanted conduct of a sexual nature), 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 (See **APPENDIX 7**);
- up-skirting, 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; and

- 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).

- displaying or generating pictures, photos or drawings of a sexual nature

It is not enough to respond to incidents as they arise, even if there are no reports in our schools it does not mean it is not happening it may be the case that it is just not being reported. We maintain an attitude of "*it could happen here*" where safeguarding is concerned.

Through the promotion of our values, we strive to create an environment that actively discourages abuse and challenges the attitudes which underlie it. We also consider our physical environment in and outside of the school gates and think about how we can make any unsafe spaces safer.

Bullying, emotional and physical abuse including initiation / hazing-type violence and rituals

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse as bullying, fighting and harassment between pupils are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if: -

- there is a large difference in power between the young people concerned; or

- the perpetrator has repeatedly tried to harm one or more other children; or

- there are concerns about the intention of the alleged perpetrator

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive regardless of whether or not severe harm was actually caused.

Child-on-child sexual violence or sexual harassment

When a child (anyone under the age of 18) commits an act of sexual violence or harassment against another child, consideration should always be given that this may constitute abuse. Sexual abuse may fall under one of two categories: -

Sexual violence	rape, assault by penetration, sexual assault (intentional sexual touching) or causing someone to engage in sexual activity.

Sexual harassment	unwanted conduct of a sexual nature – such as sexual comments, sexual jokes or taunting, physical behaviour like interfering with clothes, up-skirting or online harassment such as youth produced sexual imagery or sexting (See **APPENDIX 7**) We are aware this can occur online and face-to-face both inside and outside of the school environment

Protection and action to be taken

Should it be deemed that a young person or child (or group of children) may have abused another, a report should immediately be made as per our usual Safeguarding procedures.

The school will act in accordance with DfE guidance; Part 5 of Keeping Children Safe in Education

The designated Safeguarding Lead will notify children's social care and the police as appropriate.

It should be recognised that it is of the utmost importance that the needs and safety of both the alleged perpetrator and the victim are considered. Issues relating to the safety of victims and potential victims must be discussed first and completely separately from any issues relating to the needs of the alleged perpetrator.

The safeguarding team will consider the potential susceptibilities of the victim including those due to protected characteristics.

The response to reports of child-on-child sexual violence and sexual harassment will be decided on a case-by-case basis with the designated safeguarding lead team (DSLs) taking a lead role, supported by other agencies as required. Multi agency advice and support should always be sought in cases involving sexual assault and violence.

Where there has been a report of sexual violence, the designated safeguarding lead (or another member of the safeguarding team) should immediately consider the risks to: -

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

Where there has been a report of sexual harassment, the need for protective and supportive measures should be considered on a case-by-case basis with consideration being given to how to keep the victim and alleged perpetrator a reasonable distance apart whilst they are on the same premises.

Where scenarios involve working with children's social care, staff must not wait for the outcome of an investigation before protecting the victim and other children - the Safeguarding Team must work closely with children's social care to ensure the academy's actions do not jeopardise a statutory investigation. There must be immediate consideration for safeguarding the victim, alleged perpetrator and all other children above all else.

In cases of sexual abuse, it is especially important that consideration is given to the needs of both parties and particularly the victim with regard to confidentiality.

Information should be shared within the school community on a '*need to know'* basis only where it is necessary for an effective investigation, to resolve issues or to protect the safety and wellbeing of one or both parties. All staff who are aware of sensitive information must be made clearly aware of the importance of maintaining confidentiality.

APPENDIX 6

Additional help and advice for staff and young people can be accessed via the NSPCC's dedicated helpline for children and young people who have experienced abuse at school on **0808 800 5000** or by email at help@nspcc.org.uk.

Consensual and non-consensual sharing of Youth Produced Sexual Imagery (also known as "sexting" or "nudes")

Introduction

Youth Produced Sexual Imagery (YPSI or "Sexting" including nude or semi-nude images) can be defined as: *Images or videos generated by children under the age of 18, or of children under the age of 18, that are of a sexual nature or are indecent*. These images may be shared between young people and / or adults via a mobile phone, handheld device, computer, 'tablet' or website/app which may be shared with people including those that they may not even know.

YPSI within the wider safeguarding context "sexting" or the sending of nude or semi-nude images among children and young people is often considered to be commonplace within modern relationships however, it should be noted this is a criminal offence. It should raise concerns and in some cases may require further action or involvement with other agencies. 'YSPI / Sexting' can be defined as being "experimental" or "aggravated" (based on the Wolak and Finklehor model, 2011) and will require professionals to make informed judgements when responding.

'YSPI / Sexting' is one of a number of 'risk-taking' behaviours associated with the use of digital devices, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated. We should consider that some groups may be disproportionately susceptible to an increased risk of online abuse.

We take a pro-active approach to help students to understand, assess, manage and avoid the risks associated with 'online activity'. We recognise our duty of care to young people who do find themselves involved in such activity and our responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

It is likely that no two cases will be the same and it is necessary to carefully consider each case on its own merit. However, it is important that we apply a consistent approach wherever possible when dealing with an incident to help protect young people and the school. For this reason, the Designated Safeguarding Lead and the Academy Head teacher needs to be informed of any 'sexting' incidents. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response.

Disclosure by a student

Sexting / Youth Produced Sexual Imagery disclosures should follow the normal safeguarding practices and protocols. A student is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up.

It is important to recognise that they will need pastoral support during the disclosure and after the event.

It is vital that victims and those reporting concerns are taken seriously, kept safe and never made to feel like they are creating a problem by making a report. They may even need immediate protection

or a referral to police or social services; parents should be informed as soon as possible (police advice permitting).
The following questions will help decide upon the best course of action: -

- is the student disclosing about receiving an image, sending an image or sharing an image?
- what sort of image is it?
- is it potentially illegal or is it inappropriate?
- are the school child protection and safeguarding policies and practices being followed? *For this reason, a member of the Safeguarding team should be involved as soon as possible*.
- how widely has the image been shared and is the device in their possession?
- is it a school device or a personal device?
- does the student need immediate support and / or protection?
- are there other students and / or young people involved?
- do they know where the image has ended up?

Experimental conduct

The Association of Chief Police Officers (ACPO) advise that as a general rule it will almost always be proportionate to refer any incident involving 'aggravated' sharing of images to the Police, whereas purely '*experimental conduct*' may proportionately dealt with without such referral, most particularly if it involves the young person sharing images of themselves.

'Experimental conduct' incidents involve children or young people creating and sharing sexual images without additional concerns regarding criminal behaviour (beyond the creation or sending of images), without apparent malice towards others and involves the willing participation of those young people who were pictured.

They can be classified in the following way: -

- **Romantic**

  Young people in ongoing relationships, make images for themselves or each other, and the images are not intended to be distributed beyond the pair (for example two 16 year olds are in relationship and are sharing sexual images which are not shared beyond their relationship.

- **Sexual attention seeking**

  Cases in which images are made and sent between or amongst young people who were not known to be romantic partners, or where one young person takes pictures and sends them to

many others or posts them online, presumably to draw sexual attention (for example a 13-year-old shares a picture of their breasts to a 14-year-old when "flirting" with them.)

- **Other**

  May include cases that do not appear to have aggravating elements but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children who did not appear to have sexual motives (for example an 11 year old taking pictures of their own genitals because they find it amusing.)

If children or young people engaging in experimental incidents are aged 12 or under, or are considered to be susceptible then advice should always be sought from Children's MASH. We recognise certain groups may be ore susceptible to abuse both online and face-to-face and will work with SENDCo and appropriate professionals to support.

Aggravated 'sexting'

These incidents involve additional criminal or abusive elements beyond the creation, sending or possession of sexual images. This may include the involvement of adults, for example soliciting sexual images from children and young people, or other illegal adult involvement. It may also involve criminal or abusive behaviour by minors such as sexual abuse, extortion, deception or threats; malicious conduct arising from interpersonal conflicts; or creation or sending of images without the knowledge or against the will of those who were pictured.

They can be classified in the following way: -

- **Adult involved**

  An adult (aged 18 or over) has developed a relationship with and/or coerced a child (17 or under) in criminal sex offences. The images are generally, but not always, solicited by the adult offender(s). For example, a 16-year-old girl is coerced into sharing sexual images of herself with a 25-year-old man.

- **Youth only | Intent to harm**

  Sexual or indecent images which were created by young people (aged 13-17) as part of a consensual age appropriate relationship, which have then been shared with the intent to cause harm or distress. Cases may arise from interpersonal conflict such as break-ups and fights among friends or partners, involve criminal or abusive conduct such as blackmail, threats or deception or involve criminal sexual abuse or exploitation by juvenile offenders (aged 10-17). For example, a 14 year-old shares naked pictures of an ex-partner for revenge.

- **Youth only | Reckless misuse**

  Images are taken, sent or shared by young people without the knowledge or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result, but the culpability appears somewhat less than in the intent to harm episodes. For example, a 15-year-old takes a photo of their friend topless whilst they are changing and shares it online as "a joke".

Aggravated cases are likely to need to be discussed with Children's MASH and / or the police. Wider contextual information may also be asked for. If any illegal images of a young person are found, the Safeguarding Team will always discuss this with the Police.

Searching a device

It is vital that we always put the young person first. Staff will not search the device if this will cause additional stress to the student / person whose image has been distributed ***unless*** there is clear evidence to suggest not to do so would impede a police inquiry. Instead wherever possible we will rely on the description by the young person, secure the device and contact the Police.

The Education Act 2011 allows for a device to be examined, confiscated and securely stored if there is reason to believe it contains indecent images or extreme pornography.

On occasions where searching a device is deemed necessary we will do so in line with our searching and confiscation policy (available on the website)

If it is necessary to search a device then, where possible, the search should be conducted by someone of the same gender as the person whose image is being sought.

Wherever possible we will not search a mobile device even in response to an allegation or disclosure if this is likely to cause additional stress to the student / young person.

Handling images if an indecent image or extreme pornography is identified: -

Always

- Inform and involve the Safeguarding Team who will ensure that the Designated Safeguarding Lead is able to take any necessary strategic decisions.
- Record the incident.
- If there is an indecent image of a child on a website or a social networking site, then the Safeguarding Team will report the image to the site hosting it.

  Under normal circumstances the team would follow the reporting procedures on the respective website; however, in the case of a sexting incident involving a child or young person where it may be felt that they may be at risk of abuse, the team will report the incident directly to CEOP (child exploitation and online protection command) so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

Never

- Print out any material for evidence.
- Move any material from one storage device to another.
- Ask a pupil to share the image with you

Handling images if the image has been shared across a personal mobile device: -

Always

- Confiscate and secure the device(s) and (if appropriate) gather password / unlock code.
- Close down or switch the device off as soon as possible. This may prevent anyone removing evidence 'remotely'

Never

- View the image unless there is a clear reason to do so or view it without an additional adult present (this additional person does not need to view the image and certainly should not do so if they are of a different gender to the person whose image has been shared.
- Send, share or save the image anywhere.
- Allow students to do any of the above.

Who should deal with the incident

The person to whom the initial disclosure is made to must act in accordance with the school safeguarding and / or child protection policy in ensuring that a member of the Safeguarding Team and a senior member of staff are involved in dealing with the incident.

The Designated Safeguarding Lead should always record the incident. The Head teacher must also always be informed.

Deciding on a response

There may be many reasons why a student has engaged in sexting e.g. it may be a romantic / sexual exploration scenario or it may be due to coercion. It is important to remember that it won't always be appropriate to inform the police; this will depend on the nature of the incident.

However, it is important that incidents are always consistently recorded. It may also be necessary to assist the young person in removing the image from a website or elsewhere.

If indecent images of a young person are found, the Safeguarding Team will make referrals and contact the police if appropriate. Referrals may be made to social care, but where it may be thought that a crime may have taken place, the police should be contacted.

Young persons who have engaged in '*experimental sexting*' which is contained between two persons may be referred to the Multi Agency Safeguarding Hub (MASH) in order to identify if any support and guidance may be accessed. Those who are felt to be victims of '*sexting*' may also be referred to the MASH at a point where the police feel that this will not impede an investigation.

The academy will put the necessary safeguards in place for the student (e.g. they may need counselling support or immediate protection). The head teacher or a member of the Designated Safeguarding Team should inform parents and / or carers about the incident and how it is being

managed, unless there is a clear risk in doing so. The parent / carer may choose to inform the police themselves.

Containment and prevention

The young persons involved in 'sexting' may be left feeling sensitive and susceptible for some time. They will require monitoring by and support from appropriate adults within the academy setting.

Where cases of 'sexting' become widespread or there is thought to be the possibility of contagion then the school will reinforce the need for safer 'online' behaviour using a variety of resources.

Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other students.

The pupils' parents should usually be told what has happened so that they can keep a watchful eye over the young person especially when they are online at home.

The academy, its students and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected.

The legal position

It is important to be aware that young people involved in sharing sexual videos and pictures may be committing a criminal offence. Specifically, crimes involving indecent photographs (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 of the Criminal Justice Act 1988.

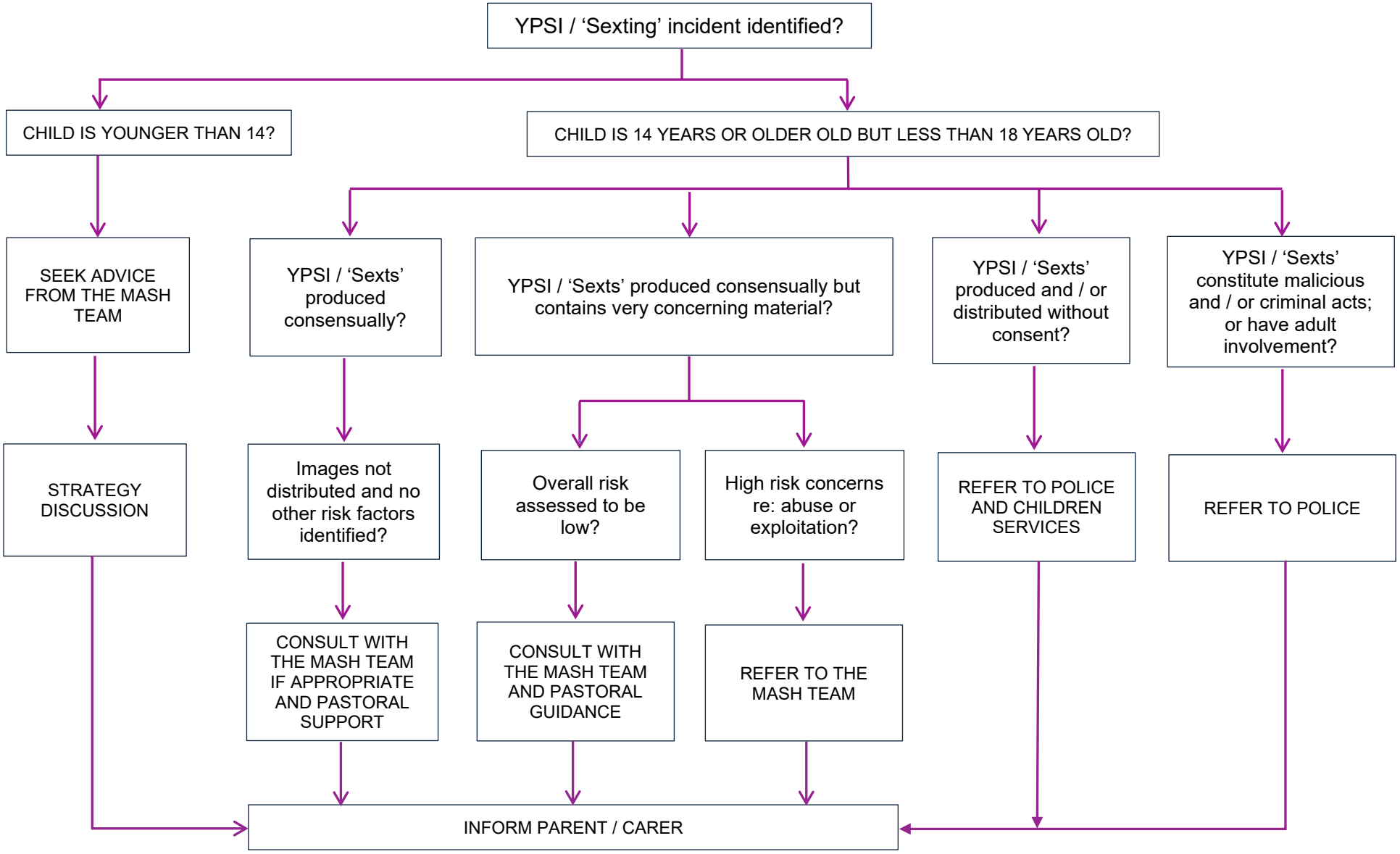
Under this legislation it is a crime to: -

- Take an indecent photograph or allow an indecent photograph to be taken;
- Make an indecent photograph (this includes downloading or opening an image that has been sent via email);
- Distribute or show such an image;
- Possess with the intention of distributing images;
- Advertise and possess such images.

While any decision to charge individuals for such offences is a matter for the Crown Prosecution Service, it is unlikely to be considered in the public interest to prosecute children. However, children and young people need to be aware that they may be breaking the law. If they send or possess images they may be visited by police and on some occasions media equipment could be removed. This is more likely if they have distributed images.

APPENDIX 7

Flowchart



Different levels of Youth Produced Sexual Imagery (YPSI) / Sexting

The following is adapted from Wolak and Finkelhor '*Sexting: a Typology*'. March 2011

Aggravated incidents involving criminal or abusive elements beyond the creation, sending or possession of youth-produced sexual images

Adult offenders

Develop relationships with and seduce underage teenagers, in criminal sex offences even without the added element of youth-produced images. Victims may be family friends, relatives, community members or contacted via the Internet. The youth produced sexual images generally, but not always, are solicited by the adult offenders.

Youth Only: Intent to Harm

Cases which: -

- arise from interpersonal conflict such as break-ups and fights among friends
- involve criminal or abusive conduct such as blackmail, threats or deception
- involve criminal sexual abuse or exploitation by juvenile offenders.

Youth Only: Reckless Misuse

No intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result, but the culpability appears somewhat less than in the malicious episodes.

Experimental incidents involve the creation and sending of youth produced sexual images, with no adult involvement, no apparent intent to harm or reckless misuse.

Romantic episodes

In which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair.

Sexual attention seeking

In which images are made and sent between or among young people who were not known to be romantic partners, or where one youngster takes pictures and sends them to many others or posts them online, presumably to draw sexual attention.

Other

Cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

Self-harm

Managing self-harm

All concerns around self-harm must be taken seriously and staff should follow safeguarding procedures and ensure that concerns are reported to the designated safeguarding lead promptly.

Staff can become aware of possible self-harm through a number of ways but most frequently through self-disclosure or peer disclosure.

Dealing with a disclosure of self-harm

Dealing with a disclosure of self-harm can be difficult and distressing. Some tips on how to respond are below

Use the “do and don’t” sections to guide your responses whilst following the steps laid out in the flowcharts below.

Do’s and Don’ts

DO

- Get immediate medical support if necessary
- Listen carefully to what you are told.
- Ask appropriate questions to determine level of risk using TED questions (tell, explain, describe)
- Explain to the young person that you will need to share what you have been told.
- Remind the young person that they have done the right thing in sharing and that you are there to support them.
- Stay with the young person if you have immediate concerns for their safety
- Record the discloser on our electronic reporting tool (CPOMS)
- Consider your own well-being and get support for yourself if distressed / in shock (e.g. staff *Health Shield* support)

DON’T

- Pass judgement on what you are being told.
- Try not to show, shock, distaste or distress.
- Make the child promise not to do it again.
- Promise to keep a secret.
- Promise not to tell the young person’s parents.

APPENDIX 8

Managing self-harm | Crisis situation

Member of staff suspects young person has self-harmed and is in need of immediate medical attention

Contact emergency services if injury is life-threatening or if young person is suicidal

If the child / young person is taken to hospital, emergency protocols for treatment and care will be implemented and a CAMHS referral will be activated by the hospital

On young person's return to provision, refer to process for managing recent / historical self-harm

Assess immediate risk

Call for help from Colleague / Emergency Services

Administer First Aid

Keep calm and give reassurance – too the individual young person and to all those who might be affected by witnessing self-harm (adults and young people)

Report and record injury and inform Designated Safeguarding Lead as per procedure

DSL to complete a Children's Services referral form with consent if possible risk for the medium term

Explain confidentiality to workers and young people involved

Still has concerns

DSL refers to Social Services, following up electronically in writing within 48 hours

Social worker and Manager acknowledge receipt of referral and decide on next course of action within 1 working day

Inform parents / carers unless there is a clear and legitimate reason not to (competency)

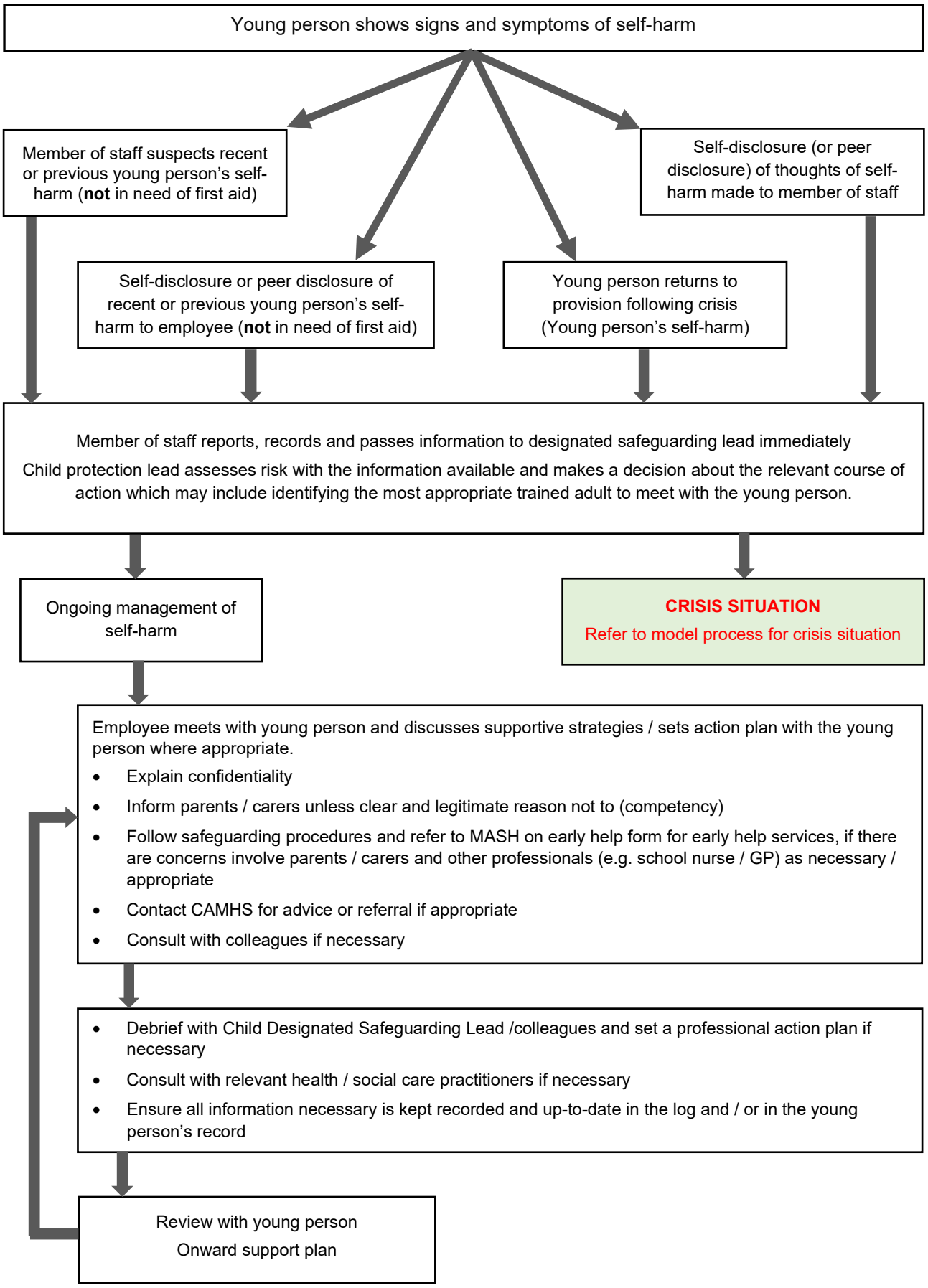
Where young person is not taken to hospital, DSL should seek advice and refer to CAHMS where appropriate

Refer to ongoing management of self-harm

ALWAYS

APPENDIX 8

Managing self-harm | Not in need of urgent medical treatment



Policy on preventing radicalisation

Introduction and scope

Children are susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our schools safeguarding approach.

All staff are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty, mutual respect, and tolerance of those with different faiths and beliefs.

All pupils and teachers have the right to speak freely and voice their opinions. However, free speech is not an unqualified privilege but is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The Academy provides a safe space in which pupils and staff can understand the risks associated with terrorism and develop knowledge and skills to be able to challenge extremist arguments.

Aims and principles

The main aims of this Policy are to ensure staff are fully engaged in being vigilant about radicalisation; that they overcome professional disbelief that such issues will not happen here and ensure that we work alongside other professional bodies and agencies to ensure that our students are safe from harm.

We recognise that there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism but that there are factors which may indicate concern.

Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The principle objectives are that: -

- All trustees, governors and staff who work with our children and young people will have an understanding of what radicalisation and extremism are and why we need to be vigilant in school;

- All trustees, governors and staff who work with our children and young people will know what the school policy is on anti-radicalisation and extremism and will follow the policy when issues arise;

- All parents / carers and students will know that the school has policies in place to keep students safe from harm and that the school regularly reviews its systems to ensure they are appropriate and effective.

Definitions

Extremism

The vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation

The process of a person legitimising support for, or the use of, terrorist violence

Terrorism

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 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.

Procedures for referrals

It is important for us to be constantly vigilant and remain fully informed about the issues which affect the region in which we teach. We remind staff to suspend any professional disbelief that instances of radicalisation '*could not happen here*' and to refer ***any*** concerns to the designated child protection teams See **APPENDIX 1**).

The Prevent Duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

The Prevent Duty does not require schools to carry out intrusion into family life but as with any other safeguarding risk the Academy will take action when they observe behaviour of concern.

The Designated Person will seek advice from Children's Services to identify when it is appropriate to make a Prevent referral.
www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

The role of the curriculum

Our curriculum promotes respect, tolerance and diversity. Children are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others.

Our PSHE (Personal, Social and Health Education), Citizenship and SMSC (Spiritual, Moral, Social and Cultural) provision is embedded across the curriculum and underpins the ethos of our school.

We strive to equip our students with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

Children are regularly taught about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the internet.

Staff training

Staff receive training to enable them to identify children who may be susceptible to radicalisation and how to respond. This is seen as part of school staff wider safeguarding duties and is similar in nature to protecting children from other harms whether these come from within their family or are the product of outside influences. Members of the Designated Safeguarding Lead team have undertaken Prevent Awareness training and are able to provide advice and support to other members of staff on protecting children from the risks of radicalisation.

Child sexual and criminal exploitation including county lines

Some definitions and terminology

Both Child Criminal Exploitation (CCE) including county lines and Child Sexual Exploitation (CSE) are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity: -

a) in exchange for something the victim needs or wants; *and/or*

b) for the financial or other advantage or increased status of the perpetrator or facilitator; *and/or*

c) through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

We recognise that children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, we know that their susceptibility as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

We understand that they may still have been criminally exploited even if the activity appears to be something they have agreed or consented to and as such should be recognised as a victim

We further recognise that the experience of girls who are criminally exploited can be very different to that of boys and that the indicators may not be the same. We know that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

We are aware that children may not feel ready or know how to tell someone that they are being exploited, and / or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened.

We also recognise that pupils form susceptible groups are at greater risk of being exploited.

County lines

This is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "burner phone" or "deal line".

Exploitation is an integral part of the county lines offending model with children and susceptible adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

We understand that CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex.

Staff are aware that children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Our priorities

We recognise the need to make clear our commitment to deal effectively with Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) and county lines. Our academy will ensure that: -

- we identify, and make known to staff and pupils, the designated lead staff who are fully trained in CSE, CCE and County Lines and that they update their training regularly. (This will usually be the same staff named in **APPENDIX 1**)

- all staff are made aware of and understand CSE, CCE and County Lines indicators and referral pathways,

- pupils are taught about CSE, CCE and County Lines and how to protect themselves and each other,
- pupils are taught about healthy (including sexual) relationships, peer pressure, bullying, e-safety, gang activity etc, and how these topics can relate to CSE, CCE and County Lines.
- pupils know who to go to for help and support and to whom they should report concerns
- relevant staff work in partnership with other agencies,
- procedures are in place to continually gather, record and share information with the Enfield Children's Service's the National Referral Mechanism and local services / third sector providers who offer support to victims of County Lines exploitation as soon as practicable, including information on pupils running away or going missing for episodes.

What to look out for

Susceptibilities

ALL children and young people, including those from supportive families can be susceptible to sexual and criminal exploitation. However, some children and young people are known to be at greater risk. For example, those that have: -

- a chaotic home / family life,
- a history of abuse (including familial child sexual abuse, risk of forced marriage, risk of so called 'honour'-based violence, physical abuse, emotional abuse or neglect),
- experienced loss / bereavement,
- associations with gangs through relatives / peers, or are living in a gang neighbourhood,
- friendships with children / young people who are being sexually exploited,
- special educational needs and disabilities,
- a lack of secure accommodation or live in residential care,
- low self-esteem / confidence,
- responsibilities as a 'young carer' (i.e. have caring responsibilities for parents' / family members)

Warning signs

Children and young people who are being sexually / criminally exploited may be: -

- going missing from home or care or regularly coming home late,
- persistently absent from school or do not take part in education,
- increasing their use of social media, dating sites, image sharing apps etc.,
- involved in risky online relationships including new contacts with people out of city,

- sharing inappropriate / indecent online images with peers, or with people only met online,
- becoming isolated / estranged from family and friends,
- meeting people befriended online,
- associating with other young people involved in exploitation
- involved in offending behaviour,
- misusing drugs / alcohol,
- experiencing sexual cyber-bullying,
- changing their physical appearance,
- having older boyfriends or girlfriends,
- experiencing sexually transmitted infections, pregnancy and terminations,
- in poor mental health and / or self-harming, having thoughts of, or attempting, suicide,
- receiving unexplained money and / or gifts from unknown sources.

Online sexual exploitation can include:

- befriending through online chat rooms / messaging services
- online grooming techniques (e.g. stalking, identity pretence, false promises e.g. meeting celebrities, tickets, gifts)
- asking children to take and share indecent images of themselves
- leverage for further demands (e.g. threat to show other people recorded sexual acts by child / young person).
- arranging offline meeting for purpose of sexually abusing child
- contact from perpetrators in other countries, & abused online
- speed of grooming can be very quick - leaving little ‘thinking time’ (the restrained influencing of a child over several months has been largely replaced by rapid escalation to threats, intimidation and coercion).

Risk assessment and consent

In assessing whether a child or young person is a victim of sexual exploitation, or at risk of becoming a victim, careful consideration should be given to the issue of consent. It is important to bear in mind that:

- sexual activity with a child under 16 is an offence;

- a child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching;
- it is an offence for a person to have a sexual relationship with a 16 or 17 year old if they hold a position of trust or authority in relation to them;
- where sexual activity with a 16 or 17 year-old does not result in an offence being committed, it may still result in harm, or the likelihood of harm being suffered;
- non consensual sex is rape whatever the age of the victim;
- if the victim is incapacitated through drink or drugs, or the victim or their family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed.
- child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18 years and not just those in a specific age group.

What to do next

Any member of staff who suspects or receives information that a child or young person may be involved in sexual or criminal exploitation (including suspicion that they are being groomed online), should refer their concerns to their Designated Safeguarding Team (See **APPENDIX 1**). It is they who will refer the matter to Children's Social Care.

If there are concerns about the involvement of a person who:

- works with children; *and / or*
- is in a position of trust

The Local Authority Designated Officer (LADO) will be informed in line with our *procedures for dealing with allegations of abuse against staff* (Please see **APPENDIX 11**)

Where appropriate, the child or young person's wishes and feelings, as well as those of their parents / carers should be sought and taken into consideration when deciding how to proceed unless to do so would not be in the child or young person's best interest and may put them at further risk of harm.

Some children or young people may have been trafficked and will need support to access services. Practitioners should refer to the '*Designated Competent Authorities*' based within the United Kingdom Human Trafficking Centre (UKHTC) and The United Kingdom Border Agency (UKBA). Their contact details are below.

Useful contacts and web links / hyperlinks

Enfield Safeguarding Partnership

https://new.enfield.gov.uk/safeguardingenfield

National Crime Agency | Modern Slavery Human Trafficking Unit (MSHTU)

www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking

The Children's Society | County lines toolkit

www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

Home office guidance

www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

Parents against child sexual exploitation

PACE is the leading national charity working with parents / carers of sexually exploited children
http://paceuk.info/

Education from the National Crime Agency

Information about online abuse
www.ceopeducation.co.uk/

Barnardo's

Advice for parents, professionals and young people on the signs of sexual exploitation and how to keep safe.
www.barnardos.org.uk/get-support/support-for-parents-and-carers/child-abuse-and-harm/child-sexual-abuse-and-exploitation

Further information

Child abuse concerns: guide for practitioners

Guidance to help practitioners identify the signs of child abuse and neglect and understand what action to take
www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

NSPCC (Sexting)

www.nspcc.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes/

Procedures for dealing with allegations of abuse against those working in or on behalf of our academies including low level concerns

Introduction

All academies forming part of North Star Community Trust take the responsibility of caring for children seriously.

We recognise that any possibility that a member of staff, contractor, volunteer or governor / trustee may have hurt a child must not only be investigated thoroughly, but in a way that does not prejudice either the child or the accused individual.

Any investigation of an allegation of abuse against those working in or on behalf of our academies must follow the professional standards and routines described in this policy and will be undertaken in accordance with the guidelines laid out in 'Keeping Children Safe in Education – Statutory guidance for schools and colleges'. https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

There are two sections to this appendix covering the two levels of concerns and allegations: -

PART A

Concerns / allegations that may meet the harm threshold and referred to the LADO

PART B

Concerns / allegations that do not meet the harm threshold (referred to as 'low-level concerns')

A. Concerns or allegations that may meet the harm threshold

Initial allegation made to the academy

It is our policy that any allegation of abuse made by a member of staff, volunteer or student must be reported immediately to the respective academy's Head teacher (or Head of school) and it is the responsibility of the adult, to whom that disclosure is made, to do so. This obligation extends to include behaviour that may have happened outside of school that might make an individual unsuitable to work with children. This is known as transferable risk.

In their absence, the allegation should be reported to an academy Designated Safeguarding Lead (DSL) (See **APPENDIX 1**)

The Head teacher will report the allegation to the Chief Executive Officer and the Trust's Head of Safeguarding without delay and on the same day that the allegation is received wherever possible, should it meet any of the following criteria where any member of staff (including a volunteer or visiting professional) in the school has: -

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; *or*
- behaved towards a child or children in a way that indicates they would pose a risk to children; *or*
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If in doubt, the Chief Executive Officer and Head teacher will seek procedural advice from the Trust's Head of Safeguarding and from the local authority.

There are two aspects to consider when an allegation is made: -

1. **Looking after the welfare of the child**
   The designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.

2. **Investigating and supporting the person subject to the allegation**
   The academy will nominate a case manager (usually the head teacher but the head teacher may choose to delegate this authority to another senior leader in the Trust). The case manager should discuss with the Local Authority Designated Officer (LADO) the nature, content and context of the allegation and agree a course of action.

There may be up to three strands in the consideration of an allegation: -

- a police investigation of a possible criminal offence
- enquiries and assessment by children's social care about whether a child is in need of a protection or in need of services (Social Services).

- consideration by the school of disciplinary action in respect of the individual.

Should the allegation relate to / be made against a Head teacher, this should be brought to the attention of the Chief Executive Officer (CEO) immediately

Should the allegation be made against the Chief Executive Officer (CEO) then this should be brought to the attention of the Chair of the Board of Trustees immediately.

Should the allegation be made against a member of agency staff or a supply teacher we will in no circumstances cease to use a member of staff due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. We will discuss with the supply agency or agencies where the supply teacher is working across a number of schools of colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst investigations are ongoing.

Initial consideration

Before investigating the allegation or discussing the allegation with the staff member in question the Head teacher must discuss the matter with the Local Authority Designated Officer (LADO) to provide any details of the allegation and the circumstances in which it was made in accordance with our legal duty. The Chief Executive Officer should also be informed who will notify the Board of Trustees where appropriate.

We may conduct some basic enquiries to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

A non-exhaustive list of example questions includes: -

- was the individual in the school or college at the time of the allegations?
- did the individual, or could they have, come into contact with the child?
- are there any witnesses? and,
- was there any CCTV footage?

Some rare allegations will be so serious they require immediate intervention by children's social care services and / or police. LADO should be informed of all allegations that come to a school's or college's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate.

The LADO will advise whether or not informing the parent / carers of the child (fully or partially) will impede the investigation. If it is agreed the information can be fully or partially shared, the Head teacher will inform the parent / carer. In the event the child is injured and requires medical treatment the parent / carer may need to be informed straightaway.

The Head teacher will also seek advice from the LADO, the police and / or Local Authority children's social care to agree what information can be disclosed to the person accused. This should be as soon as possible to inform of the nature of the allegation, how the enquiry will be conducted and the

possible outcomes (e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body). If the person is a member of a union or professional association, he / she will be advised to contact that organisation.

At this point, the LADO will identify and make any necessary referrals to external agencies.

If the allegation is about physical contact or there is cause to suspect a child is suffering (or is likely to suffer) significant harm, a strategy discussion involving the police and/or local authority children's social care will be convened in accordance with the statutory guidance Working Together to Safeguard Children. The strategy discussion and initial evaluation with the police will take into account the fact that teachers and other school staff are at liberty to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour (in line with Section *93 of the Education and Inspections Act 2006).*
www.legislation.gov.uk/ukpga/2006/40/contents

Where there are concerns about the welfare of other children in the community or the member of staff's family, these will be discussed with the designated safeguarding lead and make a risk assessment of the situation. It may be necessary for the designated safeguarding lead to make a referral to local authority children's social care.

Action following initial consideration

Where the initial consideration decides that it does not involve a possible criminal offence, the responsibility of dealing with the allegation rests with the Trust. In such cases, and if the nature of the allegation does not require the involvement of external agencies, it will be progressed in accordance with the appropriate internal procedures and following discussion with the LADO.

Where further investigation is required to inform consideration of disciplinary action the Trust will agree who is best placed to undertake that with the LADO. Usually the investigation will be undertaken by a senior member of school staff however where independent investigation is required head teachers will be supported by the Trusts HR team and investigations may be carried out by an independent third party or senior Trust staff from the central team or other academies.

Case subject to police investigation

If the police and / or Crown Prosecution Service (CPS) decide not to charge the individual with an offence, or decide to administer a caution, or the person is acquitted by a Court, the police should wherever possible aim to pass to the Head teacher, all information they have which may be relevant to a disciplinary case. In those circumstances the Head teacher and the LADO should proceed as described above.

Supporting children and families

With the agreement of the LADO and / or Reviewing Officer, parents or carers of a child or children involved will be told of the allegations as soon as possible if they are not already aware. They will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution.

In line with government guidance parents or carers of the child or children involved will be: -

- formally told about the allegation as soon as possible. (we will consult the LADO and where involved children's social care and / or the police on what information can be disclosed);

- kept informed about the progress of the case, only in relation to their child no information can be shared regarding the staff member; *and*

- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002 (as inserted by Section 13 of Part 3 of the 2011 amendments)

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited.

Supporting the subject of the allegation

We recognise our duty of care to our employees. We will do all we can to: -

- manage and minimise the stress caused by the allegation;

- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;

- advise the individual to contact their trade union representative, or a colleague for support;

- appoint a named representative to keep the person informed about progress of the case;

- provide access to counselling or medical advice where appropriate.

- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Timescales (monitoring)

It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. Every effort will be made to manage cases to avoid any unnecessary delay whilst co-operating fully with the relevant agencies.

Reviews will be held regularly; usually fortnightly or monthly depending on the complexity of the case.

Suspension

In some cases, suspension will be considered where there is cause to suspect a child or children are at risk of harm, if the allegation warrants investigation by the police, or is so serious that it might be grounds for dismissal. However, a person will not be suspended automatically, or without careful thought and all other options to avoid suspension will be considered prior to taking that step.

Any suspension will be considered under the terms of our disciplinary policy after a full risk assessment and all practical alternatives such as redeployment we be considered. Decisions will be made after consultation with the LADO who will canvass police / social services views about whether the accused member of staff needs to be suspended from contact with children, so as to inform the school's consideration of suspension. The Head teacher or the Chief Executive Officer will keep the individual informed about developments at school.

Where we are made aware that the Secretary of State has made an interim prohibition order, in respect of an individual we will take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the Teaching Regulation Agency investigation, the individual must not carry out teaching work.

Action on conclusion of a case

In cases where it is decided that a person who has been suspended can return to work subject to any disciplinary action where applicable, the academy will consider how best to facilitate that and we appreciate that most people will benefit from some help and support. Depending on the individual's circumstances, a phased return and / or the provision of a monitor to provide assistance with support may be appropriate. The school will also consider how the person's contact with the child or children who made the allegation can be best managed if they are still attending the school.

If the allegation is substantiated and the person is dismissed or the Trust ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the Trust will refer to the DBS for consideration of whether inclusion on the barred lists is required. There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Record keeping

All records will be kept in line with UK GDPR acknowledging the special category data requirements

Recording of all allegations will be kept including those where it is deemed that no further action is required. The following definitions should be used when determining the outcome of allegation investigations: -

- **SUBSTANTIATED** (i.e. there is sufficient evidence to prove the allegation)
- **UNSUBSTANTIATED** (i.e. there is insufficient evidence to either prove or disprove the allegation The term, therefore, does not imply guilt or innocence).
- **FALSE** (i.e. there is sufficient evidence to disprove the allegation)
- **MALICIOUS** (i.e. there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation)
- **UNFOUNDED** (i.e. to reflect cases where this is no evidence or proper basis which supports the allegation being made)

Action in respect of false, malicious or unsubstantiated allegations

If an allegation is found to be false, malicious or unsubstantiated the LADO or school designated safeguarding lead may refer the matter to Children's social services to determine whether the child concerned is in need of services, or may have been abused by someone else.

In the rare event that an allegation is shown to have been deliberately invented or malicious, the Head teacher will consider whether any disciplinary action is appropriate against the pupil who made it, or the police should be asked to consider whether any action might be appropriate against the person responsible if he / she was not a pupil.

Whilst records of allegations and subsequent actions are held securely, details of allegations that are found to have been malicious should be removed from the personnel record of that member of staff and held securely and separately.

Records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Resignation and settlement agreements

Every effort will be made to reach a conclusion in all cases even if: -

- The individual refuses to cooperate, having been given a full opportunity to answer the allegation and make representations.

- It may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete but we shall reach and record an outcome wherever possible.

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. A referral to the DBS must be made, if the criteria for a referral are met and those circumstances it will not be appropriate to reach a settlement / compromise agreement. Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome will be made clear when providing references to prospective employers.

Learning lessons

At the conclusion of a case in which an allegation is substantiated the academy, in conjunction with the LADO, will review the circumstances of the case to determine whether there are any improvements to be made to the school or college's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated.

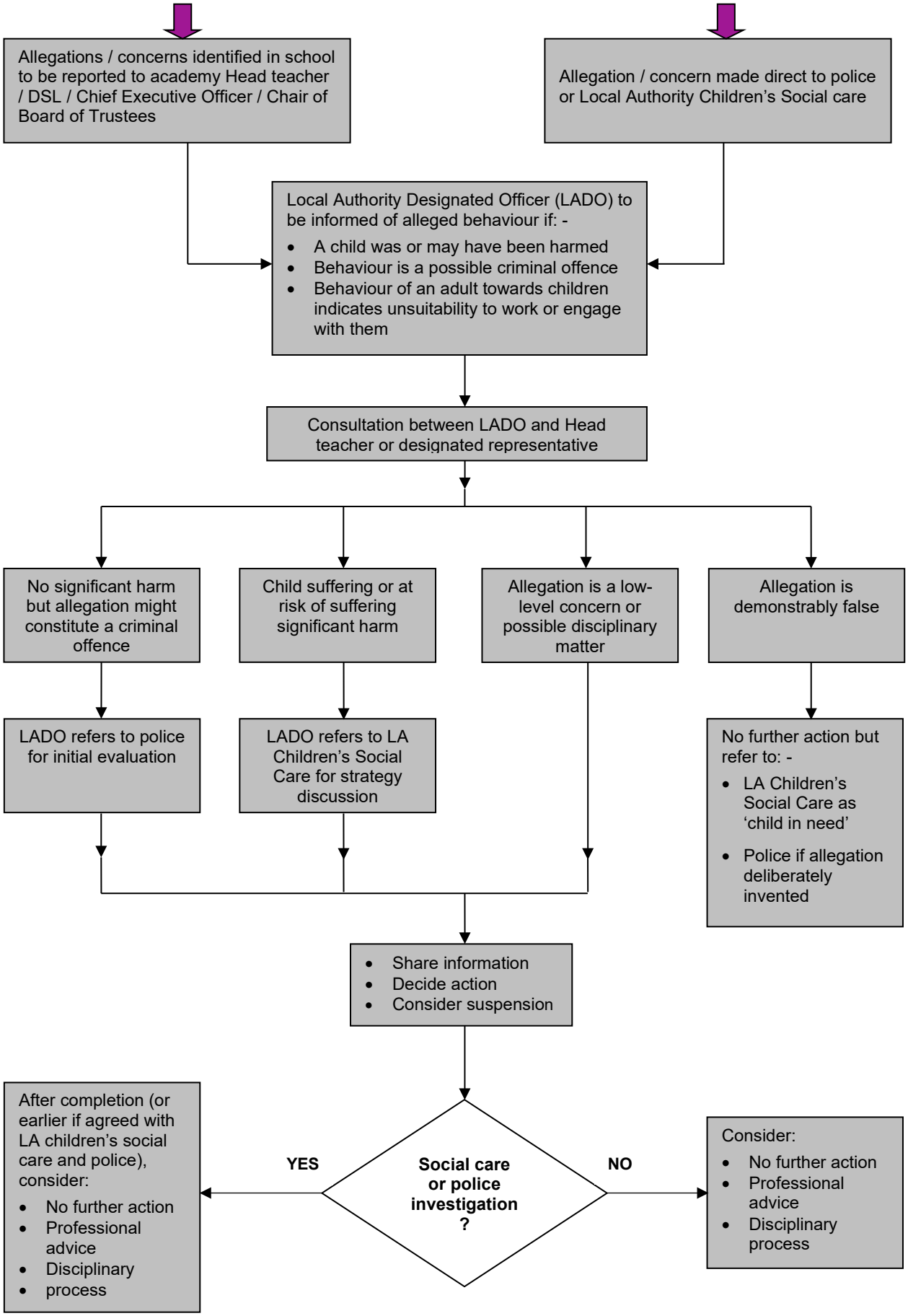
Should an adult make an allegation to our schools that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, will still be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

Allegations against an individual or organisation using the school premises

As per our lettings policy and outlined in APPENDIX 2, we ensure that any organisations or individuals hiring our premises have appropriate safeguarding arrangements in place. Whilst our safeguarding procedures will apply to those attending any activities or services we directly manage (regardless of whether those attendees are known to us) we may consider any concern raised about individuals on our premises in line with our procedures if we feel it is appropriate to do so.

APPENDIX 11

Procedure for dealing with allegations of abuse against staff flow chart



B. Concerns or allegations that do not meet the harm threshold (referred to as 'low level concerns')

As part of our whole school approach to safeguarding, our academies promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately is critical in order to: -

- enable us to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, *and*
- ensure that adults working in or on behalf of our Trust are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the Trust may have acted in a way that: -

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

Examples of such behaviour could include, but are not limited to: -

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless (or behaviour that may look to be inappropriate, but might not be in specific circumstances) through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Our Safeguarding training emphasises what constitutes a low level concern and the importance of all low-level concerns being shared responsibly with the right person, with the Head teacher, Head

of Safeguarding or CEO who will then respond to ensure that these are recorded and dealt with appropriately. We also encourage staff to feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and / or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Staff can anonymously report 'low level concerns' via the form available on out intranet.

Our approach to responding to low level concerns aims to: -

- ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empower staff to share any low-level safeguarding concerns
- address unprofessional behaviour and supporting the individual to correct it at an early stage
- handle and respond to such concerns sensitively and proportionately when they are raised, *and*
- identify any weakness in the Trust's safeguarding system.

Responding to low-level concerns

The following procedure will be followed for responding to reports of low-level concerns.

If the concern has been raised via a third party, the Head teacher / Head of Safeguarding /CEO will collect as much evidence as possible by speaking: -

- directly to the person who raised the concern, unless it has been raised anonymously, *and*
- to the individual involved and any witnesses.

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for their decisions and action taken.

Sharing low-level concerns

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Where there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

Recording low-level concerns

All low-level concerns should be documented. These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Low level concerns log

The record should include: -

- details of the concern
- context in which the concern arose,
- outcome / any action taken,
- name(s) of the individual sharing their concerns (if known) unless the individual wishes to remain anonymous which must be respected as far as reasonably possible.

The log will be reviewed by Head teacher, Head of Safeguarding or Chief Executive Officer: -

- to help more easily identify patterns that may involve more than one member of staff.
- so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of behaviour is identified, the Trust will decide on a course of action either: -

- through our disciplinary investigation and / or proceedings; or
- where a pattern of behaviour moves from a concern to meeting the harm threshold a referral to the LADO will be made (as per Part A)

We will retain such information, until the individual leaves our employment.

Consideration will also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and if it is appropriate for policies to be revised, or extra training delivered to minimise the risk of it happening again.

Reference requests

As per Part 3 of Keeping Children Safe in Education 2024, where a reference is sought, we will only provide facts of any substantiated safeguarding concerns / allegations (including a group of low-level concerns about the same individual) that meet the harm threshold.

Low-level concerns will not be included in references unless they relate to issues which may normally be included in a reference (for example, misconduct or poor performance).

It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

In line with Paragraph 24(a) of Part 4 in Schedule 2 of the Data Protection Act 2018, employment references given (or to be given) in confidence for the purposes of employment or prospective employment are exempt from the subject access provisions of UK GDPR.

Contact with the police

Sharing personal data of pupils

Our schools have signed a data sharing agreement with the MET Police. This means both we and they have agreed to work collaboratively but it does not mean that either are entitled to information about children without first adhering to the appropriate steps.

Where the police need to request personal data from us

In the absence of a court order or otherwise enabled by Section 47 of the Children Act which would likely allow us to provide it, requests for personal data must be assessed on a case by case basis.

In order for us to assess this request UK GDPR, the Data Protection Act 2018 and the data sharing agreement we have in place require that the police provide us with sufficient information as to why they are asking and for what purpose they require it.

The police may have their own but otherwise a form, which seeks all the information necessary for us to make this assessment, is available for them to complete.

The form is entitled 'Police requests for disclosure of personal data (in the absence of a Court Order or otherwise enabled by Section 47 of the Children Act)' and can be found under the heading 'Data protection policy, privacy notices and related documents' on the policies page of the school website.

Where we need to request personal data from the police

The data sharing agreement requires us to complete a form which details what we are seeking and why we are seeking it. The police will assess any such request and decide whether or not it can be shared in line with the Criminal Justice Act 2003, UK GDPR and the Data Protection Act 2018.

The form is entitled 'Form for when we need to request personal data from the police' and can be found in the 'Safeguarding' section of the '*Policies and procedures*' section on the Trust's Intranet https://northstartrust.sharepoint.com/sites/NSCT-Policies/SitePages/Safeguarding.aspx

Meeting with pupils

As per the Police and Criminal Evidence Act 1984 (PACE), if the Police arrive unannounced, they should always be directed to the Head teacher in the first instance (or Designated Safeguarding Lead, Deputy Designated Safeguarding Lead or Trust's head of Safeguarding in their absence)

If Police are attending school to visit a pupil or group of pupils this is normally pre-arranged and they must be met by the appropriate staff.

Police officers, of any rank, should not be allowed into the school nor allowed to speak with pupils without the Head teacher, DSL, DDSL or Trust's Head of Safeguarding being made aware.

One of these people will organise the next steps.

There is a requirement for a child to have an 'Appropriate Adult' present when they are in contact with the Police and this must be either: -

- the parent or guardian.
- a social worker
- another responsible adult such as the DSL or Headteacher.

PACE states that: -

- anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child; *and*
- if at any time an officer has any reason to suspect that a person of any age may be susceptible , then that person is entitled to be accompanied by an appropriate adult at any point.

The member of staff present will inform the Police Officer of any susceptibilities known by the school, before they speak to a pupil.

If, having been informed of the susceptibilities, the member of staff present does not feel that the Police Officer is acting in accordance with PACE, they should ask to speak with their supervisor or contact 101 to escalate their concerns.

Details should be recorded on the pupil's safeguarding record including details of: -

- who spoke to the pupil (name of officer and badge number)
- who else was present
- date and time

School must always be seen as a safe place for children to attend but there may be reasons why the arrest is required to be made at school. The member of staff should feel confident to discuss this further with a senior police officer before agreeing to this taking place on the school site. If they are unhappy with the rationale, they can object and ask for further consideration to be given to the appropriateness of this.

Useful information

PACE Code C 2019 (accessible) - GOV.UK

www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

When to Call the Police (NPCC Guidance for Schools and Colleges)

www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf

APPENDIX X

Safeguarding and child protection concern report

Do not delay in reporting your concern. Where you are concerned that a child may be at immediate risk and '*CPOMS*' is not available, contact a member of the Safeguarding Team **immediately** and then submit this form within 24 hours of the initial report

Academy (please tick)			
Enfield Heights ACADEMY ☐	Heron Hall ACADEMY ☐	Kingfisher Hall ACADEMY ☐	Woodpecker Hall ACADEMY ☐

Details			
PUPIL'S NAME:		**Date of birth:**	
Class / form:		**Year group:**	

Cause of concern

Your response / actions so far

Date and time of incident or period of time that you have had this concern

Additional information including background, interaction with parents etc.

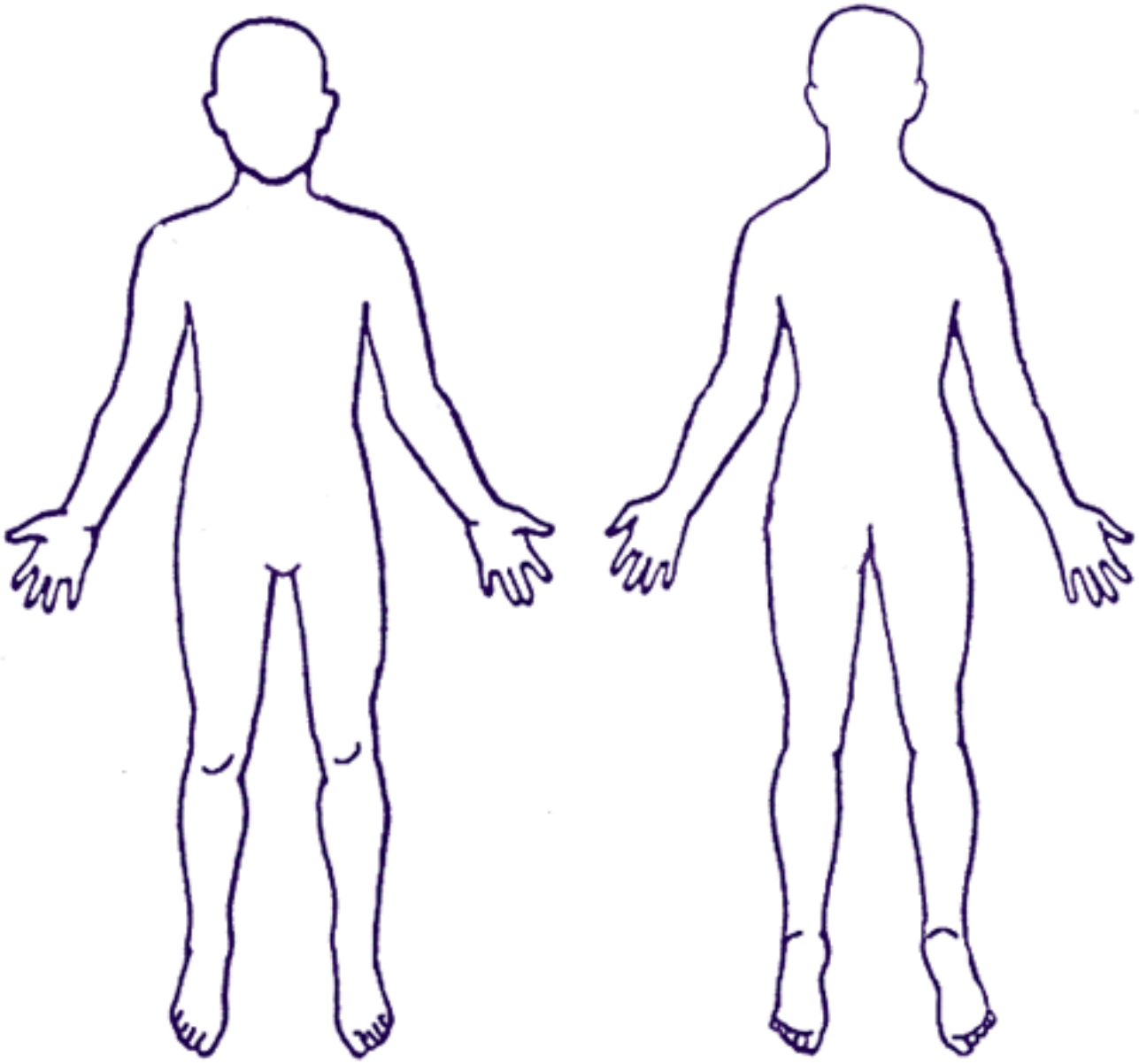
Body map included?	Please tick either **Yes** ☐ or **No** ☐

Reported by:		Reported to:	
Signature:		Date:	

Body Map

These body maps may be replicated as required.

Only complete the body map if the injuries are clearly visible or shown to you freely.

Please note on the body map any bruising, scars, injuries, red marks etc giving as much detail as possible under the prevailing circumstances as to size, colour and so on.

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