



Compass
Academy Trust

Child Protection and Safeguarding Policy

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1. Policy Statement and Principles

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, governors and trustees in the school and the academy. It is consistent to the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities. We recognise that all staff, including volunteers, have a full and active part to play in protecting our pupils from harm.

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

Our schools play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- › Behaviour policy
- › Pastoral support system
- › Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
 - What constitutes sexual harassment and sexual violence and why they are always unacceptable

This policy is in line with the document, Keeping Children Safe in Education (September 2023) and should be read alongside:

- statutory guidance: Working Together to Safeguard Children
- departmental advice: What to do if you are Worried a Child is Being Abused - Advice for Practitioners

Our policies on bullying, racial incidents and equal opportunities, staff conduct, safer recruitment, allegations against staff, complaints, pupil behaviour and online safety are outlined in separate policies. All staff recognise that to condone or allow bullying or being subject to racial incidents may lead to consideration under child protection procedures.

This policy is available on the Compass Academy Trust website and on each school website and is included in the staff handbook.

Our core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance.
- safer children make successful learners.
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

1.2 Child Protection - Statement of Intent

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent to those of the Bromley Safeguarding Children's Board.

1.3 Policy Principles

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support

1.4 Policy Aims

- To make our expectations for Child Protection and Safeguarding clear to all staff who work with children within our Trust.
- To provide all staff with the necessary training and information to enable them to meet their child protection responsibilities, this includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- To ensure consistent good practice
- To demonstrate the school's commitment to pupils, parents and other partners regarding child protection

We ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- All staff are aware of how GDPR regulations operate alongside sharing safeguarding information with other agencies.

2. Terminology

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. Safeguarding means: protecting children from abuse and maltreatment. preventing harm to children's health or development.

Child Protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

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

Governors refers both governors on local governing bodies and trustees on the Trust board.

DSL refers to the designated safeguarding lead at the school.

Child includes everyone under the age of 18.

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

3. Roles and Responsibilities

Key Personnel

Board of Trustees	Safeguard Lead – Tom Robin
Unicorn	DSL – Clare Bevan DDSL – Victoria Elvines Governor – Gail Preston Head Teacher - Victoria Elvines
Oak Lodge	DSL – Diane Lowton, Linda Allen & Dan Grice DDSL – Tracy Jackson Governor – James Ashforth Head Teacher - Diane Lowton
Marian Vian	DSL - Ian Redgrave & Karen Swain DDSL - Sue Livett and Katrina Walsh Governor – Richard Loader Head Teacher - Ian Redgrave
Wickham Common	DSL – Rebecca Williams DDSL – Bethan Liston Governor – Joel Kennedy Head Teacher – Rebecca Williams

The Board of Trustees has an overarching role in ensuring that policies, procedures and training in Compass schools are effective and comply with the law at all times. The Trust’s over-arching statement on Safeguarding and Child Protection is available on the website <https://www.compassacademytrust.co.uk/>

3.1 Good Practice Guidelines and Staff Code of Conduct

In Compass Academy Trust, we expect good practice and staff code of conduct to look like the following:

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

3.2 The Local Governing Board (LGB)

The Governing Board will:

- › Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development and liaise with the lead trustee where appropriate.
- › Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head Teacher to account for its implementation
- › Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- › Appoint a senior board level (or equivalent) lead [or, link governor] to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- › Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - The DSL takes lead responsibility for understanding the filtering and monitoring systems and process in place in school
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - All staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects that those pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group
 - The school has appropriate filtering and monitoring systems in place and review their effectiveness (See Appendix 9)
 - The [DfE's filtering and monitoring standards](#) are reviewed, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
 - All staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners
 - Staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- › Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Where we receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), this will be dealt with in the same way as any other safeguarding allegation. We will follow our usual policies and procedures, including informing the LADO as appropriate.

The chair of governors will act as the 'case manager' if an allegation of abuse is made against the Head Teacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

3.3 Designated Safeguarding Lead

Our schools have designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSL). The DSLs will

- co-ordinate action within the school and liaise with Children's Social Care and other agencies over cases of abuse and suspected abuse;
- act as a source of advice within the school;
- ensure that staff are familiar with the policy and procedures;
- be responsible for record keeping;
- refer individual cases of suspected abuse;
- arrange and lead regular Safeguarding meetings; liaise with agencies about individual cases and organise training within school.
- liaise with the Head Teacher (or senior member of staff in the Head Teacher's absence) advising them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult to support them in the case of a police investigation or search.
- Have a good understanding of harmful sexual behaviour
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged instigators (widely referred to as perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Take lead responsibility for understanding the filtering and monitoring processes which are in place in school

The DSL is supported by a Safeguarding Team which includes a Deputy Designated Safeguarding Lead (DDSL). During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The Safeguarding Team can be contacted Out of Hours, if necessary, using the Safeguarding Email or their mobile phones.

When the DSL is absent, the deputies will act as cover.

3.4 Head Teacher

The Head Teacher must ensure that there is DSL in post and must ensure that up-to-date records relating to Child Protection are kept. These include:

- Staff training records.

- Ensuring that signed Code of Safe Conduct forms are sent to the Central team to support the maintenance of the Single Central Record (SCR).
- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction.
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly. This training must include online safety training.
- Ensuring that Induction training refers to the safeguarding policy.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met where applicable, for example the ratios specific to early years provision.
- Ensuring that each child in the EYFS is assigned a key worker.
- Overseeing the safe use of technology, mobile phones and cameras in the early years setting.
- Making decisions regarding all low-level concerns, although they may wish to collaborate with the DSL on this.

3.5 Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

3.6 All staff

All staff will be given a copy of this Policy in September 2023 and on joining a school will sign to confirm that they have read and understood the Policy and agree to adhere to it. In addition, all staff will read and understand Parts 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2023](#), and review this guidance at least annually.

Staff will reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online).

Staff will know and understand their expectations, roles and responsibilities around the filtering and monitoring systems used in school.

Staff will provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including the staff Code of Conduct and the role of the designated safeguarding lead (DSL) and deputies, the Behaviour Policy, the Online Safety Policy and the safeguarding response to children who go missing from education. (See also safeguarding procedures for individual schools within the Trust)
- The early help process (sometimes known as the common assessment framework or CAF) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as Child-on-Child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation, and serious violence (including those linked to county lines) and that these rarely stand alone
- Extrafamilial harms can take a variety of forms and be multiple
- Previously looked after children who potentially remain vulnerable. All staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.
- The importance of reassuring victims that they are being taken seriously and will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi, trans or questioning (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection
- Children not feeling ready or knowing how to tell someone that they are being abused, exploited, or neglected. They may not recognise their experiences as harmful, and may feel embarrassed, humiliated, or may be being threatened. Staff should determine how best to build trusted relationships with children and young people which facilitate communication.

3.7 Volunteers

Volunteers and work experience students who work in Compass schools will have training on Safeguarding and Child Protection issues, be vigilant and understand the processes to report any concerns to a member of staff. A member of the safeguarding team will carry out this training (see also Appendix 2).

4. Abuse of Position of Trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

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

5. Equality statement

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

We give special consideration to children who:

- Have special educational needs or disabilities

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are affected by parental substance misuse, domestic violence or parental mental health needs
- Live away from home or in temporary accommodation or live in chaotic and unsupportive home situations
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked-after, or have previously been looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- In receipt of Early Help (CAF)

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

6. Confidentiality

It is important that all staff and volunteers feel confident that they will be supported if they must deal with a safeguarding issue. It is also vital that the confidentiality of parents and pupils is respected. Staff will be mindful that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- The Data Protection Act (2015) and UK GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category data' the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- The government's information sharing advice for safeguarding practitioners includes 7 golden rules for sharing information (see appendix 7), and will support staff who have to make decisions about sharing information
- Information must be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of serious harm, or withholding will impinge the support or progress of a child
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests
- Confidentiality is also addressed in this policy with respect to record-keeping, see below, and allegations of abuse against staff in Appendix 3
- If staff are at any doubt about sharing information, they should speak to their DSL/DDSL
- Egress or a password protected document, will be sent for children with a safeguard concern

- If a victim asks the school not to tell anyone about sexual violence or sexual harassment:
 - There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged instigator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' see appendix 7

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

6.1 Information Sharing

Staff will be pro-active in sharing information with local agencies. All staff are trained in UK GDPR/Data Protection Act (DPA) and understand their duties regarding the legislation and know that they are expected to share safeguarding information effectively.

The school co-operates with our statutory duty if named as a relevant safeguarding agency.

7. Recognising abuse and taking action

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

7.1 If a child is in immediate danger

Make a referral to children's social care and/or the police immediately if a child is in immediate danger or at risk of harm. Anyone can make a referral.

Tell the DSL/DDSL as soon as possible if you make a referral directly. A referral direct to the local authority can be made at: <https://www.bromley.gov.uk/children-families/reporting-child-abuse>

Or via the NSPCC website at: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/>

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you including non-recent abuse, you should:

- Always take the disclosure seriously
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret. Bear in mind that some children may:
 - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
 - Not recognise their experiences as harmful
 - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Teaching staff will record on Safeguard and inform the DSL or safeguarding team of the record. Support Staff, Administrators, Visitors (inc supply teachers), site-team and volunteers will record using the form in Appendix 8. Sign and date the write-up and pass it on to the DSL or member of the safeguarding team immediately. Return to the safeguarding team within 24 hours to ensure that you are notified of action and have access to emotional support if required See Appendix 8
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (and tell the DSL as soon as possible that you have done so)

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child. All children should feel supported and kept safe, and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

7.3 If you discover that a pupil has been subject to FGM has taken or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education (2023, p161) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting,' 'circumcision' or 'initiation.'

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

Any teacher who either:

- **Is informed by a girl under 18 that an act of FGM has been carried out on her; or**
- **Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.**

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

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

Any other member of staff must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a pupil is *at risk* of FGM, or who discovers that an act of FGM appears to have been carried out on a pupil under 18, should speak to the DSL and follow our local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to a child being in immediate danger)

Signs that should always be a cause for concern may be changes such as:

- Difficulty concentrating and not doing as well at school
- Becoming withdrawn
- Mood or behaviour changes, for example:
 - Becoming more irritable
 - Being angry
 - Aggressive behaviour
 - Clinginess
 - Attention-seeking behaviour
 - 'Acting out'
 - Tiredness
 - Mental health needs, for example, signs of depression, anxiety, eating disorders or post-traumatic stress disorder (PTSD)
 - Self-harming
 - Risk-taking behaviour, for example:
 - Stealing
 - Bullying
 - Running away
 - Sexual activity
 - Trespassing or vandalism
 - Fighting
 - Truancy
 - Using drugs or alcohol

Remember: be professionally curious. If you see something that does not feel right, no matter how small, report it to the DSL.

8. Flowchart of Actions where there are Concerns about a Child

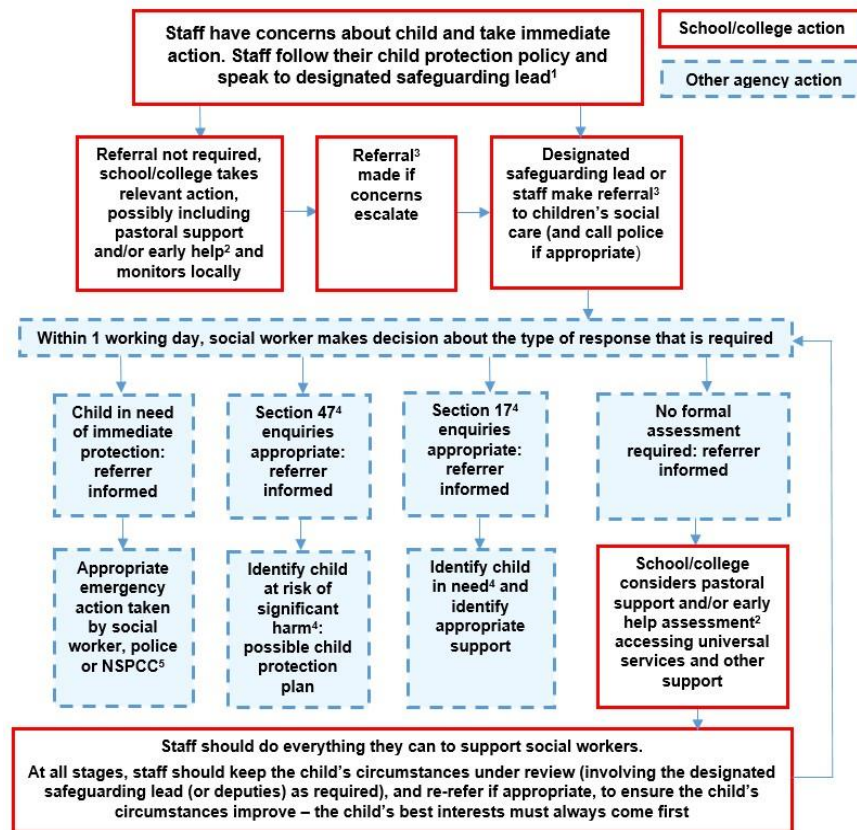


Figure 1 (above and Appendix 8) illustrates the procedure to follow if you have concerns about a child's welfare and the child *is not in immediate danger*.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

9. Early Help / Common Assessment Framework (CAF)

If Early Help (or a CAF in LBB) is appropriate, the DSL/DDSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements

The DSL/DDSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed and reported to the Bromley Local Authority CAF Team. At Risk Groups include:

- Young Carers
- Children with SEND
- Pupils with Health Conditions
- Pupils with Mental Health Needs
- Pupils with a family member in prison or who are affected by parental offending
- Pupils at risk of Honour-Based abuse (such as FGM or Forced Marriage)

- Pupils who are consistently absent from school, including persistent absences for part of the school day

9.1 Referral

If it is appropriate to refer the case to the Local Authority Children's Social Care or the police, the DSL/DDSL will make the referral or support you to do so.

If you make a referral directly you must tell the DSL/DDSL as soon as possible and record the incident promptly.

The Local Authority should decide within *1 working day* of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the Local Authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

9.2 Children Missing Education

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage. We also monitor and track when a child arrives or transfers to another school. If a child is believed to be Missing in Education, then online forms are available to report this on Bromley.gov.uk website.

9.3 Children whose Parents elect home education

When a parent/carer expresses their intention to remove their child from school with a view to educating at home, we will liaise with other key professionals to coordinate a meeting with parents/carers where possible before a final decision has been made.

Where a child has an Education, Health and Care plan we will review their plan in conjunction the relevant local authorities and parents and carers.

10. Radicalisation and Extremism

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

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

School staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014).

10.1 If you have concerns about Extremism:

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to Local Authority Children's Social Care directly if appropriate (see 'Referral' above).

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264 that school staff and governors can call to raise concerns about Extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is **not** for use in emergency situations. Chapter 3 and 4 of the Counter Terrorism and Border Security Act 2018 gives further guidance in case of staff concern.

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Staff have yearly Prevent Training

11. Serious Violent Crime

All Staff are aware of the risk factors that increase the likelihood of involvement in serious violence. These include:

- Being male
- Being frequently absent, or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Indicators which may signal those children are at risk from, or are involved with, serious violent crime include:

- Unexplained gifts and new possessions
- Increased absence from school
- Changes in friendships and relationships
- Significant decline in performance
- Signs of self-harm
- Signs of assault and unexplained injuries
- Changes in behaviour

12. Modern Slavery

All staff know that Modern Slavery can include:

- Human- trafficking and slavery
- Servitude
- Forced or compulsory labour

This exploitation takes many forms, for example sexual exploitation, forced labour, forced criminality and the removal of organs.

Staff must report any concerns of Modern Slavery / Exploitation to the DSL who decide as to whether to refer potential victims to the NRM (National Referral to Modern Slavery Mechanism).

13. If you have a Mental Health or Wellbeing concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. All staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action by contacting the DSL.

If a mental health concern is not a safeguarding concern, staff will speak to the named Mental Health Lead at each school

13.1 Promoting the Wellbeing of children and young people

The school will teach children about safeguarding in order that they can recognise when they are at risk and how to get help when they need it. Within our schools, through various teaching and learning opportunities as part of providing a broad and balanced curriculum, the children will be taught about various aspects of safeguarding including online safety and strategies to support their personal wellbeing.

14. Pupils with SEND or Health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEND or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This includes:

- Learning Mentor
- Emotional Literacy Support Assistant
- Nurture Group
- Outside agency therapeutic support
- Consistent support plans and risk assessments

15. Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

16. Looked After and previously looked after Children

The most common reason for children becoming looked after is because of abuse or neglect. The school ensures that staff have the necessary skills, knowledge and understanding to keep all children, including looked after and previously looked after children safe. Appropriate staff have information about a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

Our schools appoint a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- › Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
 - › Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans
- Appropriate staff have relevant information about a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
 - The DSL has details of children's social workers and relevant virtual school heads
 - Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
 - Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

17. Concerns Around Adults in School - this includes a staff member or volunteer, contractor or supply teacher

Low-Level Concerns

The term low-level concern does not mean that it is insignificant, but it means that the behaviour towards a child does not meet the harm threshold. If there is any doubt as to whether a low-level concern meets the harm threshold, then consult your local authority designated officer (LADO).

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

A low-level concern is any concern – *no matter how small and even if no more than a 'nagging doubt'* – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct including inappropriate conduct outside of school
- Does not meet the allegations threshold or is otherwise not considered 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
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate intimidating or offensive language
- Humiliating pupils

Sharing low-level concerns

If you have concerns about any member of staff (including a contractor, supply teacher or volunteer), or an allegation is made about a member of staff (including a contractor, supply teacher volunteer) posing a risk of harm towards a child(ren), speak to the Head Teacher as soon as possible.

If you have concerns about the Head Teacher, speak to the EHT or, if preferred, the Chair of the Trust Audit and Risk Committee or the governor with responsibility for Safeguarding, they will then follow the procedures set out in Appendix 3, in line with Trust procedures, if appropriate.

Following Bromley safeguarding procedures, the school will inform the LADO / Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

18. Allegations of abuse made against other pupils (Child-on-Child Abuse)

We recognise that children are capable of abusing other children, and that children with SEND are three times more likely to be abused than their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up.” Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the Inclusion Lead.

The DfE has published detailed advice to support schools. The advice from September 2021 is available here:

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

This includes, what sexual violence and sexual harassment look like, important context to be aware of, related legal responsibilities for schools and colleges and advice on a whole school approach to preventing child on child sexual violence and sexual harassment.

We adopt a zero-tolerance approach to sexual violence and sexual harassment, because we recognise that failure to do so can lead to a culture of unacceptable behaviour and in the worst-case scenario, a culture that normalises abuse.

We recognise that even if there are no reports, it does not mean it is not happening.

Most cases of pupils hurting other pupils will be dealt with under our school's Behaviour Policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Prejudice-based and gender-based discriminatory bullying (see Behaviour Policy)
- Involves non-consensual sexual activity, including but not limited to sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting, sharing of nudes and semi-nudes), forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party
- Abuse in intimate/personal relationship between peers
- Involves up skirting (typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm). Up skirting is a criminal offence. Down blousing is also unacceptable, and our schools have a zero-tolerance to both
- Online abuse, including abusive, harassing, misogynistic messages, non-consensual sharing of images (particularly in chat groups) and sharing of abusive images and pornography to those who do not want to receive such content.
- Children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Our Schools have a zero-tolerance approach to homophobia, biphobia and transphobia.

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

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a *risk assessment* and *support plan* into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged instigator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

The Head Teacher/Safeguarding Governor/DSL/EHT/Chair of the Trust Audit and Risk Committee will then follow the procedures set out in Appendix 3, in line with Trust procedures, if appropriate.

19. Opportunities to teach safeguarding

We have a duty to ensure that children are taught about how to keep themselves and others safe, including online. Relevant topics will be included within Relationships and Health Education

We understand that we play a crucial role in preventative education which prepares our children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. We have a clear ethos and set of values which are upheld and demonstrated throughout all aspects of our school and are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence based PSHE and RSE using the Coram SCARFE materials, delivered in regularly timetabled lessons and reinforced throughout the whole curriculum and in assemblies.

This has been developed to be age appropriate (especially when considering the needs of children with SEND and other vulnerabilities) and will cover issues such as:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Additional guidance can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

20. Responding to reports of sexual violence and sexual harassment

Our initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment or the situation dismissed as ‘banter.’ A victim must never be made to feel ashamed for making a report.

We will follow our usual safeguarding practices in such cases, including:

- not promising confidentiality at this initial stage as it is highly likely a concern will have to be shared further (for example, with the designated safeguarding lead or children’s social care) to discuss next steps.
- the report will only be shared with those people who are necessary to progress it.
- We will explain to the victim what the next steps will be and who the report will be passed to
- We recognise a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust.
- We will provide a safe space for children to speak out and share their concerns with members of staff
- We will be supportive and respectful of the child, listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading

questions and only prompting the child where necessary with open questions – where, when, what, etc;

- We will devote full attention to the child and listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- The staff member will immediately write up a thorough summary only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children’s social care and/or part of a criminal investigation;
- Where the report includes an online element, we will be aware of searching screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges).
- The designated safeguarding lead (or deputy) should be informed, as soon as practically possible.
- The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children’s social care, and
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is 10, if the alleged instigator is under 10, the starting principle of referring to the police remains
- We will (in most cases) engage with both the victim’s and alleged instigator’s parents or carers when there has been a report of sexual violence (this might not be necessary in relation to sexual harassment, but decisions will be made on a case-by-case basis)
- The exception is if there is reason to believe informing a parent or carer will put the child at additional risk
- We will carefully consider what information to provide about the other child involved, and when, making sure that we work with relevant agencies to ensure our approach to information sharing is consistent
- It is good practice to:
 - Meet the victim’s parent or carers with the victim to discuss what is being put in place to safeguard and support them, and how the report will progress
 - Meet with the alleged instigator’s parents or carers to discuss what is being put in place that will impact them, e.g. moving them out of classes with the victim. You should explain the reason behind any decision
- The DSL or DDSL would attend these meetings, deciding what other agencies should attend on a case-by-case basis
- We will provide support to children who have witnessed sexual violence, especially rape and assault by penetration
- We will try to ensure the victim, alleged instigator(s) and any witnesses are not being bullied or harassed

We will minimise the risk of Child-on-Child abuse or harassment (including sexual) by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing or up-skirting (including down blousing) towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent (RSHE education)
- Ensuring pupils know they can talk to staff confidentially through regularly reinforcing this message and talking to the children, for example in assemblies and circle time and understand their role in preventing and responding where they believe a child may be at risk
- Ensure staff reassure victims that they are being taken seriously
- Being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Ensuring staff are trained to understand that a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse. We have a zero-tolerance culture towards homophobia, biphobia and transphobia.

The DSL will take the lead role in any disciplining of the alleged instigator(s). We will provide support at the same time as taking any disciplinary action.

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

- › Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this
- › There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

21. Nudes and Semi-Nudes (sexting / ‘youth produced sexual imagery’)

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

Staff must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

Staff must report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Head Teacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary, the incident may be referred to the police by dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded promptly.

22. Child abduction and Community Safety Incident

All staff are knowledgeable in the school's Missing in Education protocol (also see Appendix 4) and Late Collections Policy. Staff adhere to the collection procedures to ensure children only go home with their designated adults. All staff know and understand Private Fostering is an arrangement made privately (i.e. without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled), by someone other than a parent or close relative, with the intention that it should last for 28 days or more. Staff will inform the safeguarding team if they have information or suspicions regarding Private Fostering.

Staff are aware that Child Abduction is when a child/children are taken from their parents/carers without permission and this can be committed by parents or other family members, by people known but not related to the child (such as neighbours, friends and acquaintances, and by strangers).

In the event of a Community Safety Incident (such as unknown adult loitering near school or trying to talk to children), or if something is perceived as suspicious or does not feel right, staff will report this (or be informed of) these incidents immediately.

23. Online Abuse and Cybercrime: Mobile technology

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors

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

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

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

The 4 key categories of risk

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

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

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

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

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

To meet our aims and address the risks above, we will:

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

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year. All staff will also receive cyber safety training annually.

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

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

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

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

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

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

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

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

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, to continue to provide them with the relevant skills and knowledge to safeguard effectively

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website [here](#). The Head Teacher is responsible for overseeing the safe use of mobile phones and technology in Early Years.

All staff are aware that technology is a significant component in many safeguarding issues and that abuse can happen online, offline or both (see above Child-on-Child abuse and E Safety Policy). Staff are aware that some groups of children are potentially at more risk of harm than others, including online harm.

Children who are particularly skilled in computing and technology may be drawn into Cybercrime, either deliberately or inadvertently. Cybercrime is defined as criminal activity committed using computers and/or the internet. This includes activities such as hacking, 'denial of service' attacks (where a website is made unavailable), creating and using malware, such as viruses.

We understand that children with special educational needs or disabilities (SEND), or certain medical or physical health conditions can face additional barriers, including cognitive understanding (being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges, or the consequences of doing so).

24. Mobile phones, cameras and technology

Staff are allowed to bring their personal phones to school for their own use but will limit such use to *non-contact time* when pupils are *not* present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

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

We will follow the General Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Visitors will be made aware that they should not use mobile phones whilst on site, and that under no circumstances should they take photographs – see section 4.

24.1. Staff/Pupil Online Relationships

Each school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation (please see the e-safety policy).

25. Notifying parents

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

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

26. Complaints and concerns about school safeguarding practices

26.1 Complaints against staff

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

26.2 Whistle-blowing

The Trust has a Whistle Blowing Policy which staff should refer to should they feel that our Safeguarding Policy is unsafe or failing pupils. ([Trust Whistleblowing Policy](#))

27. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded, either in writing, or on the Safeguard software. If you are in any doubt about whether to record something, discuss it with the DSL. Paper records will be securely stored and digital records via a secure online platform (Safeguard).

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

Safeguarding records relating to individual children will be retained for a reasonable period after they have left the school and in accordance with the Trust's Data Retention Policy. Information will be sent securely to schools on transition which will have been checked by two adults prior to sending and a receipt will be obtained via a secure online portal (for example egress). If a child/children leave the borough or country and there are no details of a receiving school, Bromley Admissions Team and the designated EWO will be informed.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

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

- › **5 days** for an in-year transfer, or within
- › **The first 5 days** of the start of a new term

If the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to make any necessary preparations to ensure the child's safety.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 and 4 gives further information about record keeping with respect to allegations against staff.

28. Training

28.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board.

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

All staff will undertake Prevent awareness training and FGM Training throughout the year.

All staff will receive general training about the filtering and monitoring systems in place in school and will understand that the DSL has responsibility for understanding these systems.

Staff will also receive safeguarding and child protection updates through termly e-mail updates and staff meetings as required.

Volunteers and work experience student will receive appropriate training, if applicable.

28.2 The DSLs, Deputies and Assistants

The DSLs, Deputies and Assistants will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

28.3 Governors

All governors and trustees will receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge and understand their responsibilities

29. Safer Recruitment

Compass Academy Trust complies with the requirements of Keeping Children Safe in Education (DfE 2022) and the BSCB by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The trust's Staff Recruitment policy and procedures set out the process in full and includes informing candidates that online searches will be completed as part of the due diligence process.

At least one member of each recruitment panel will have attended safer recruitment training.

All relevant staff (involved in early years' settings and/or before or after school care for children under eight) are made aware of the disqualification and disqualification by association legislation and their obligations to disclose relevant information to the school.

Each school obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the school have been appropriately checked. When the staff arrive, they have their DBS and ID checked and evidenced by a member of the office staff or SLT.

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

The trust maintains a single central record of recruitment checks undertaken and of documents used to verify the successful candidate's identity, right to work and required qualifications will be kept on their personnel file

30. Contractors

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

31. Site Security

All members of staff are required to always wear an identity badge on a lanyard and sign into school. Visitors to the schools, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. The head teachers will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

32. Extended School and Off-Site Arrangements

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

If an allegation is received relating to an incident where an individual or organisation was using the school premises for running an activity for children, we will follow our school safeguarding policies and procedures, including informing the LADO, as we would with any safeguarding allegation.

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

33. Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures which can be accessed in the Anti-Bullying Policy

34. Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the school should notify the local authority of the circumstances.

35. Related Safeguarding Portfolio Policies

This policy should be read alongside our other safeguarding policies, which are set out in Appendix Twelve.

Appendix 1: Four Categories of Abuse

Physical Abuse

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

Emotional Abuse

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

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, sexting, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators of Abuse

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

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

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

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless regarding their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their schoolwork
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.

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

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. We recognise that parents and carers may have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding recognises that young people are vulnerable to abuse in a range of social contexts.

If there are any concerns staff and parents should share with the DSL immediately

Appendix 2: Safer Recruitment and DBS checks and procedures

We will record all information on the checks carried out in the school's single central record (SCR). We follow requirements and best practice in obtaining these checks, as set out below.

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are to be employed as a teacher or undertake teaching work without supervision. This may include HLTA's and TA's.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that the candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Ask for written information about previous employment history and check that information is not contradictory or incomplete

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

In addition, as part of the shortlisting process, we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. We will advise shortlisted candidates that online searches may be done as part of our due diligence checks.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a **regular** basis (once a week or more often, or on more than 3 days in a 30-day period) in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work **regularly** in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Confirmation from the agency that the supply/agency staff, coaches or peripatetic teachers will have completed Safeguarding training from their agencies will be obtained. The staff must read and sign to say they understand KCSIE 2023 Parts 1 & 5 and Annex A & C, the Compass School Child Protection and Safeguarding Policy, Behaviour Policy and the Staff Code of Conduct p.166 KCSIE 2023

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

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

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

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

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

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

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

Trainee/student teachers

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

Volunteers

We will:

- *Never* leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Governors

All trustees and local governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

All trustees and local governors will have the following checks:

- Right to work in the UK
- Other checks if, in the last 5 years they have lived, travelled or worked abroad for more than three months
- A section 128 directive

Work Experience

Adults who supervise pupils on work experience

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

DBS Checking

Where students **over the age of 16** undertake work experience in school, they will be subject to an enhanced DBS check as a volunteer at the school. They cannot undertake work experience without this.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unfounded, unsubstantiated or malicious. We will not refer to any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

We will refer to substantiated allegations in references, provided that the information is factual and does not include opinions.

Appendix 3: Allegations of Abuse Made Against Staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

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

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police, in conjunction with guidance from the LADO.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly and in conjunction with the LADO, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement. In the case of an allegation to a member of supply or third-party staff, an investigation would precede any dismissal (p 88, KCSIE 2023).

Low level concerns

Sharing low-level concerns

It is essential that any such concerns, including those which do not meet the harms threshold, are shared confidentially with the DSL and are recorded and dealt with appropriately. The DSL will inform the Head Teacher of all the low-level concerns, and the Head Teacher will make a decision in relation to the concern in collaboration with the DSL. See Appendix 3 for further information on referral processes.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns should also be recorded. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records of low-level concerns will be kept on the staff member's personnel file and reviewed regularly to identify any patterns of behaviour. Where a pattern of behaviour is identified, further advice will be sought from the school's HR representative and/or LADO and the necessary action taken. If, at any time, the harms threshold is met, the case will be referred to the LADO immediately.

As part of the review process, consideration will be given as to whether there are wider cultural issues within the school that enabled the behaviour to occur and, where appropriate, policies will be revised, or additional training delivered to minimise the risk of such behaviours being repeated.

When dealing with any allegation against a staff member, supply teacher, volunteer or when dealing with low-level concerns, the Trust Managing Allegations Policy should be consulted and followed

Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not encounter the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Compass t Schools Academy Trust

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence) or
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Head Teacher (or EHT where the Head Teacher is the subject of the allegation) – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The EHT (acting as the 'case manager') may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to

children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. They can also seek advice and support from their Trade Union Representative.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the National College for Teaching and Leadership.

Where the police are involved, wherever possible the Academy Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, considering information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the NCTL to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Head Teacher, or other appropriate person in the case of an allegation against the Head Teacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, and will consider:

- Awareness of the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- What can be done to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, what information can be shared and any support for the children involved
- The potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unfounded, unsubstantiated or malicious. We will not refer to any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

We will refer to substantiated allegations in references, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Appendix 4: Specific Safeguarding Issues

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will call the police and all named contacts, and members of staff will search the area around the school.

Children who are absent from education

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. It is important the school or college's response to persistently absent pupils supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support, includes:

- Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

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

- Are at risk of harm or neglect
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

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

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an

immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

Non-collection of children

If a child is not collected at the end of the session/day, they will be taken to main reception. We will call around all contacts in the first instance. If this does not result in the child being collected, we may, in some circumstances, advise contacts that if the child is not collected within 30 minutes of the end of the school day, then social services will be contacted.

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to

share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

Children who witness domestic abuse, either in the family setting or outside the immediate family are also victims as this can have a lasting effect on children. They may see, hear or experience the effects in their own home or in their own intimate relationships (teenage relationship abuse) in which they may be victims or instigators of abuse. This can have a long-term impact on the child's health, well-being and development and their ability to learn.

FGM

The DSL will make sure that staff are trained appropriately to equip them to be alert to children affected by FGM or at risk of FGM.

Pages 13 – 14 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl may be:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for extended periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or notable change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to consider the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 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.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views

- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including online safety.

Prohibited Items

Compass Schools comply with the DfE Searching, screening and confiscation Guidance 2022: The Head Teacher or staff authorised by them can make the decision to search pupils or their possessions, without consent, if they have reasonable grounds for suspecting prohibited items, such as:

- Knives or weapons
- Alcohol
- Illegal or controlled drugs
- Stolen items
- Tobacco and cigarette papers or vape items
- Fireworks
- Pornographic materials
- Any article that staff suspect has been, or is likely to:
 - Cause personal injury
 - Damage to property or persons
 - Any items banned by the school and identified in the school rules

No member of staff will carry out any search without a member of the Safeguarding Team present. Parents and carers will be informed of any search.

New Migrant Families

Additional processes have been put in place by the local authority to smooth the transition into school of children from migrant families entering the UK in the light of the Ukrainian crisis. The DSL will work with the local authority when the children start school and will work with the parents and an interpreter to obtain background information.

We will be aware that the child may have witnessed traumatic events and may be separated from members of the family who remain in the Ukraine.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and will be given appropriate safeguarding information.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in and wear a visitor's badge. Staff are expected to challenge anyone they see on site without a visitor badge visible.

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

Appendix 5: Safeguarding Considerations for Remote Education

On-line safety

All schools are now using more online resources, and the resources used must all comply with the Trust GDPR requirements. As part of the online planning process, we must ensure children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. Staff must be aware that some children are more at risk of harm, and that this applies also to online harm. As well as reporting routes back to the school this should also signpost children to age-appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content □
- [CEOP](#) - for advice on making a report about online abuse

Online-safety is regularly referenced in whole school assemblies and throughout the curriculum.

We are in regular contact with parents and carers, for example through weekly newsletters and through the home learning being set each week. We should use our lines of communication to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will ask to access and be clear who from the school their child is going to be interacting with online.

Parents and carers may well be looking for other support from the many companies offering tuition. Schools must advise parents of the need to use reputable providers who can evidence their online safety and credentials for having access to children. Schools should signpost parents and carers to the following support:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and careers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers

Updates for keeping safe online are published on the school website for parent access with details for reporting online abuse.

Appendix 6: Children Adopted from Care

Adoption is an extremely sensitive issue, and our schools have a process to ensure that the child's move, either into or away from one of our schools, is dealt with carefully and with a view to ensure that we do not jeopardise the child or the adoption placement. That a child is in care or adopted should be on a need-to-know basis. There is a named member of staff with responsibility for looked after children.

The Adoption Process

A child may arrive at school living with their pre-adoptive parents. At this stage, they are still a Child Looked After with parental responsibility shared between the LA and the pre-adoptive parents. The adoption will usually take place some months later at which point the parental responsibility moves to the adoptive parents.

When the child joins the school, the pre-adoptive parents may wish the child to be known by their surname, as it will change to this after the adoption. At this stage, the child must be registered with the legal surname and the pre-adoptive family surname as preferred.

UPN

The DfE guidance <https://www.gov.uk/government/publications/unique-pupil-numbers> clearly states the need for a new UPN to be issued. Paragraph 6.5 of this document outlines requirements in further detail.

Pupil Premium

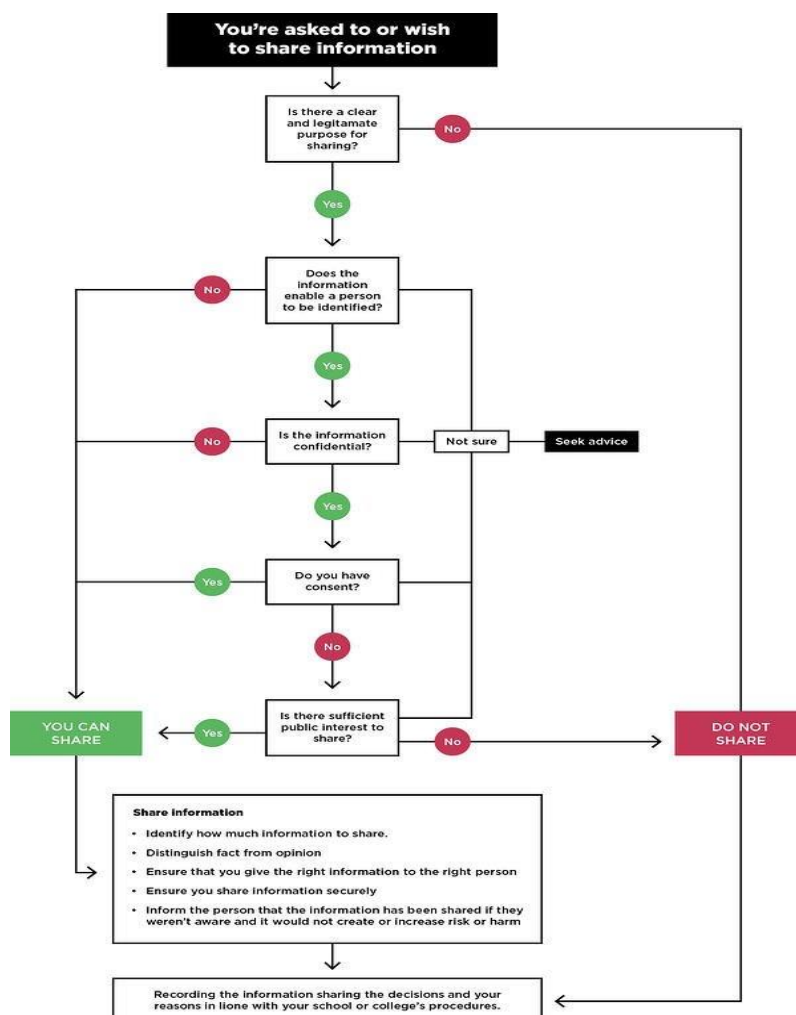
Whilst the child is in care, the school will receive Pupil Premium LAC, but once adopted the child will no longer be in the care of the LA. The child can be entitled to receive Pupil Premium (PP+) as a child who has been adopted from care, but the school will need the express permission of the adoptive parents on order to be able to claim this.

Appendix 7 - Information Sharing in Schools: The Seven Golden Rules to Follow

To keep children and young people safe in schools and colleges, you need to share information appropriately so the correct decisions can be made to protect them. This is why the government has outlined the seven golden rules for information sharing as safeguarding involves sensitive information which directly affects the welfare of children and young people.

However, clear boundaries around information sharing or disclosures are important to maintain confidentiality where appropriate. Underneath the seven golden rules for information sharing below, you will also find a useful flowchart of key questions.

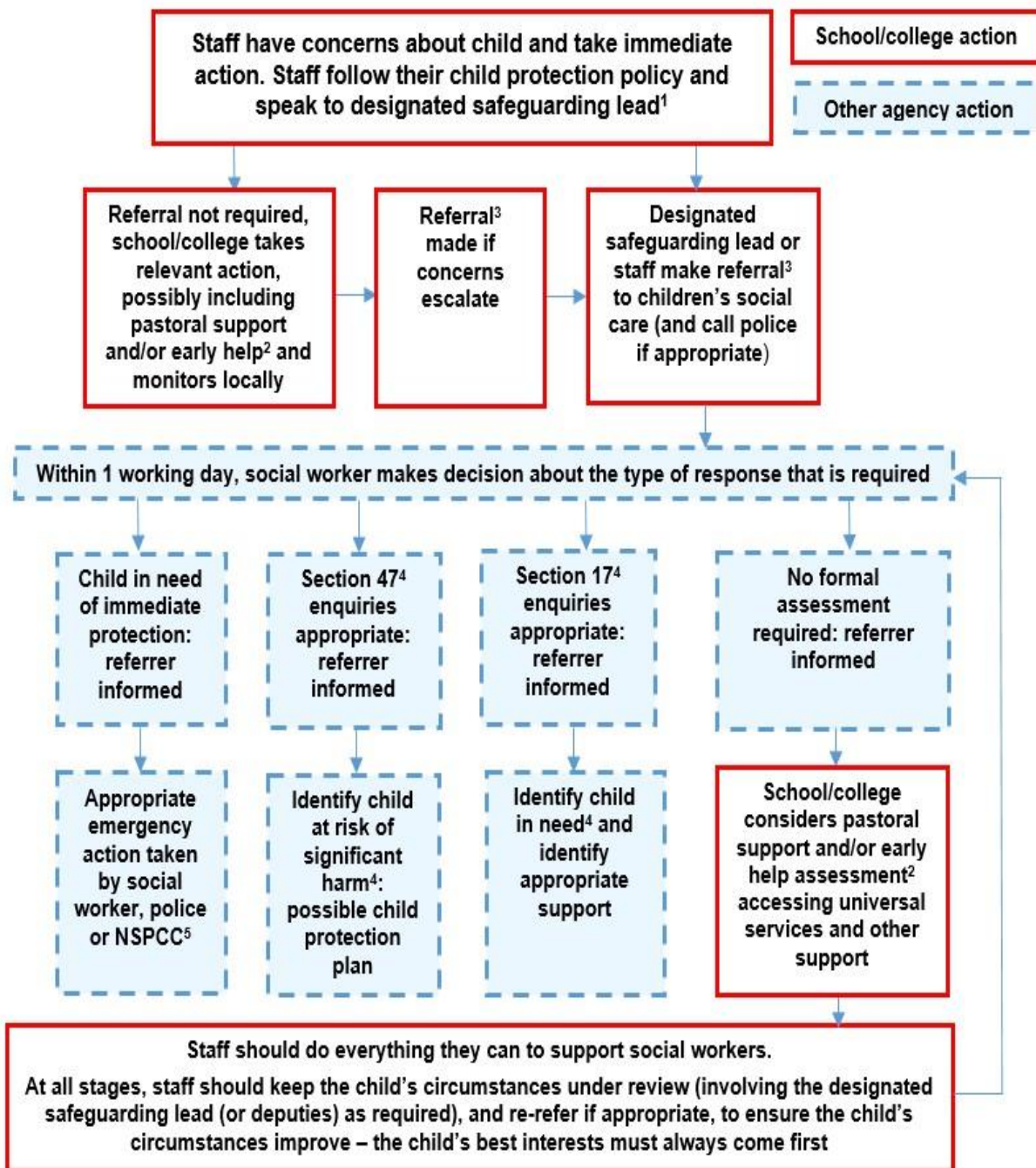
1. GDPR Isn't a Barrier to Sharing Information
2. Be Open and Honest
3. Seek Advice
4. Share With Consent Where Appropriate
5. Consider Safety and Wellbeing
6. Necessary, Proportionate, Relevant, Accurate, Timely and Secure
7. Keep a Record



<https://blog.insidegovernment.co.uk/schools/information-sharing-the-seven-golden-rules-to-follow#:~:text=Necessary%2C%20Proportionate%2C%20Relevant%2C%20Adequate,fashion%20and%20also%20shared%20securel>

Appendix 8: Flowchart of Actions where there are Concerns about a Child

(Quick reference)



Awaiting Information

Appendix 10 - Legislation and Statutory Guidance

This policy is based on: The Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.

It also takes into consideration The following safeguarding legislation and guidance:

- The Children Act 1989
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2011 (updated terminology 2021)
- Working Together to Safeguard Children 2018
- What to do if you are worried a child is being abused 2015
- Counter Terrorism and Border Security Act 2019
- Prevent Duty- June 2015 updated 2021
- Guidance for safer working practice for those working with children and young people in an education setting – 2022
- Allegations of Abuse Against Staff policy and procedures
- Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns
- National Crime Agency's CEOP Education Programme for advice and support
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- D.F.E 2023 filtering and monitoring standards
- Cyber security standards for schools and colleges.GOV.UK.
- The guidance on '[Keeping children safe in out-of-school settings](#)' details the safeguarding arrangements that schools and colleges should expect these providers to have in place.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they are being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children

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

This policy also complies with our funding agreement and articles of association.

Appendix 11 - Related Safeguarding Policies

- CAT Staff Code of Conduct
- CAT Complaints Policy and Procedures
- CAT Whistleblowing Policy
- CAT SEND Policy
- Adopted Bromley Model Grievance Procedure for Staff in Academies
- Adopted Bromley Model Disciplinary Procedure for Staff in Academies
- CAT ICT Acceptable Use Policy
- Behaviour – Local School Behaviour Policy
- Anti-Bullying – Local School Anti-Bullying Policy