

**INVICTUS**

Education Trust



# Safeguarding and Child Protection Policy

**Document Control and Version Control**

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V 1.1	A JACKSON	01/09/24	Annual cycle re-write to give effect to changes in statutory guidance. Removal of other policies in appendices and references made. Update of who to contact when dealing with allegations of abuse against staff.

## **Invictus Education Trust Safeguarding Statement of Intent**

Children and young people have a fundamental right to be protected from harm. They have a right to expect schools to provide a safe and secure environment. It is a guiding principle of the law and child protection procedures that the protection and welfare of a child must always be the first priority. Failure to provide an effective response can have serious consequences for the child. We provide a safe, nurturing and welcoming environment for all of our children, regardless of age, ability, culture race, language, religion, gender identity or sexual identity. Kindness and care is at the heart of everyday practice.

We are committed to safeguarding children and young people and there is a fundamental expectation that everyone who works or volunteers with us shares this commitment. All staff, trustees/associate governors and volunteers must fulfil their role in keeping children safe and align to our whole school safeguarding approach. All staff receive an appropriate level of safeguarding training which is elevated and aligned to responsibility. Safeguarding training and updates is a regular feature within whole staff briefings where we leave no room for complacency and continually refresh staff with safeguarding guidance.

A child-centred approach is essential where we have clear understanding of the needs and views of children. We recognise the importance of providing a safe, warm and nurturing environment, enabling children to talk openly about anything that worries them and to feel confident that they will be listened to.

We have robust systems and procedures in place including curriculum time, where we educate our children to safeguard themselves in and out of school hours. They have access to helpline support and contact information which is regularly revisited throughout the year.

We update this policy at least annually to reflect changes to law, guidance and best practice.

We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional support to the child.

All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any children, young people or staff involved in child protection or safeguarding issues will receive appropriate support.

Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among children and young people and we set a good example by conducting ourselves appropriately.

All of our staff have clear understanding of how to respond to disclosures, and will reassure children and young people that their concerns will be taken seriously in a supported and safe space.

This policy should be read in conjunction with Keeping Children Safe in Education (September 2024), which is statutory guidance to be read and followed by schools and colleges, alongside Working together to safeguard children (March 2018), a guide to inter-agency working to safeguard and promote the welfare of children.

Furthermore, school leaders will follow the procedures set out by the local safeguarding partnership:

## Contents

Important Contacts .....	5
1. Aims.....	6
2. Legislation and statutory guidance .....	6
3. Definitions .....	7
4. Equality statement .....	8
5. Roles and responsibilities.....	8
6. Confidentiality.....	13
7. Recognising abuse and taking action .....	14
8. Online safety and the use of mobile technology .....	25
9. Working with parents and carers.....	27
<b>9.1 Notifying Parents or Carers</b> .....	<b>28</b>
10. Children with Special Educational Needs, Disabilities or Health Issues.....	28
11. Children with a Social Worker.....	29
12. Pupils who are lesbian, gay, bisexual or gender questioning .....	29
Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out.....	30
13. Looked-After and Previously Looked-After Children .....	30
14. Complaints and Concerns About School Safeguarding Policies.....	30
14.1 Complaints against staff.....	30
14.2 Other Complaints .....	30
14.3 Whistleblowing .....	30
15. Record-keeping and information sharing .....	31
16. Training .....	32
16.1 All Staff.....	32
16.2 The DSL And DDSL .....	32
16.3 Trustees and Associate Governors.....	33
16.4 Recruitment – Interview Panels .....	33
16.5 Staff who have contact with pupils and families.....	33
17. Monitoring Arrangements .....	33
18. Links with other policies .....	33
19. Site Security .....	33
Appendix 1: Types of Abuse.....	35
Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures.....	36
Appendix 3: Allegations of Abuse Made Against Staff.....	36
Appendix 4: Specific Safeguarding Issues .....	36
Keeping Children Safe in Education 2024 .....	36

## Important Contacts

Name	Role	Date and level of training	Email address
Antoinette Jackson	Safeguarding, attendance and behaviour Trust lead	Advanced safeguarding 6 <sup>th</sup> October 2023 Refresher training 17/7/24	ajackson@invictus.education
Erica Tilley	Headteacher DSL	Advanced Level 2/3 training 13/09/2023 Refresher 11/09/24	etilley@ruffordprimary.co.uk
Paul Crosthwaite	DDSL AHT Online Safety Lead	Advanced Level 2/3 training 10/07/2023	<a href="mailto:pcrosthwaite@ruffordprimary.co.uk">pcrosthwaite@ruffordprimary.co.uk</a>
Lacie Faux	DDSL AHT SENCo Mental Health Lead	Advanced Level 2/3 19/9/2023	lfaux@ruffordprimary.co.uk
Pippa Laight	DDSL Attendance Lead	Advanced Level 2/3 training 16/01/2023	plaight@ruffordprimary.co.uk
Meg Gallahan	DDSL Early Help Lead	Advanced Level 2/3 training 24/04/2023	mgallahan@ruffordprimary.co.uk
Lucy Plant	DDSL Mental Health and Wellbeing Lead	Advanced Level 2/3 training 6/2/23 Refresher 23/09/24	lplant@ruffordprimary.co.uk
Nigel Smith	Chair of Academy Committee		Ssdl28229@blueyonder.co.uk
Yvonne Nelson-Brown Sukhchandan Kaur	Local authority designated officer (LADO)		01384 813110 <a href="mailto:allegations@dudley.gov.uk">allegations@dudley.gov.uk</a>  01384 813066
	Dudley safeguarding people partnership		MASH <a href="tel:03005550050">0300 555 0050</a> Out of hours <a href="tel:03005558574">0300 555 8574</a> Website: <a href="https://dudleysafeguarding.org.uk/children/professionals-working-with-children/">https://dudleysafeguarding.org.uk/children/professionals-working-with-children/</a>
	Channel helpline		Dudley Prevent website: <a href="https://www.dudleysafeandsound.org/prevent">https://www.dudleysafeandsound.org/prevent</a> Dudley Prevent referral process: <a href="https://www.dudleysafeandsound.org/files/ugd/970b20_b7dfd2e74bcc48c296f0a16949a7baaf.pdf">https://www.dudleysafeandsound.org/files/ugd/970b20_b7dfd2e74bcc48c296f0a16949a7baaf.pdf</a>

## 1. Aims

The purpose of our Safeguarding policy:

We embed a safeguarding culture across our school where all stakeholders understand that safeguarding is everyone's responsibility and have a good understanding of systems, processes and contextual safeguarding

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

Committed to developing a robust safeguarding culture of vigilance and challenge

Build resilience by raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe

Establish a safe environment in which children can learn and develop within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to

Support vulnerable pupils who have been abused, have witnessed violence towards others or may be vulnerable to abuse

Prevent unsuitable people from working with children by ensuring we practice safe recruitment in checking the suitability of all school staff, supply staff and volunteers to work with our children and maintain an active, ongoing vigilance in line with the safeguarding culture

To follow the procedures set out by the local authority children's safeguarding board, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2024

Safeguarding and promoting the welfare of children is everyone's responsibility and the voice of the child is evident

Establishing a safe environment, we enable our children to learn and develop within an ethos of openness

The importance of providing children with a balanced curriculum to support and empower personal safeguarding in all aspects of life and contributes to safe and successful outcomes.

## 2. Legislation and statutory guidance

This policy has due regard to statutory legislation and relevant guidance, including, but not limited to:

The Education Act (2002)

- Keeping Children Safe in Education (2024)
- Working Together to Safeguard Children (2023)
- What to do if you are worried about a child (2015)
- Information sharing: Advice for practitioners (2024)
- Guidance for safer working practice for adults who work with children and young people in education settings (2019)
- The Data Protection Act (2018)
- Serious Crime Act (2015)

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

- Teaching online safety in school (2018)
- UKCIS Education for a connected world (2018)
- Prevent Duty (2015)
- Sexual Offences Act 2003
- Preventing youth violence and gang involvement (2013)
- Criminal exploitation of children and vulnerable adults: county lines guidance (2018)

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

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

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

**Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images which are computer-generated images that otherwise appear to be a photograph or video.

**Children** includes everyone under the age of 18.

**Governing Board** means Academy Committee

**Governors** means Associate Governors of the Academy Committee

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

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area
- **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

## 4. Equality statement

Some children have an increased risk of abuse, both online and offline, 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 and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Look after children
- Children on child protection or child in need registers
- Children who we recognise as having a wider vulnerability

## 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and trustees/associate governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays 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, transphobia and sexual violence/harassment. This will be underpinned by our:

- Positive conduct policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - 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 FGM and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

### 5.1 All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- All staff sign a declaration at the beginning of each academic year to say that they have reviewed the guidance



## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

- All staff receive compliance safeguarding training at least annually and at induction (including online safety) which is regularly updated.
- Regular training, briefing sessions and updates, complement and enhance compliance training and that delivered by the local authority and professionals from partner organisations.
- Safeguarding knowledge checks are carried out with staff to ensure understanding from training.
- All staff know who the DSL/DDSL and the wider safeguarding team are
- All staff understand our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct policy, the online safety policy, the role and identity of the designated safeguarding lead (DSL) and the deputy designated safeguarding lead (DDSL), responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education.
- All staff understand Indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online.
- Staff are trained on professional curiosity and its importance in early identification of abuse and neglect. They are aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- All staff, but especially the DSL/DDSL consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.
- All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks online as well as face to face. They know that in many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- All staff understand the early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- All staff know 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, exploitation and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be involved, such as the DSL/DDSL and local authority children's social care. Staff never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. All staff know how to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.
- All staff know the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- All staff recognize the fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- All staff are aware of how to make a referral to children's social care, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with their potential role in such assessments.
- All staff understand their responsibility to report concerns about the behaviour of any adult in our school and know that they will be listened to and taken seriously. All staff understand their responsibility to escalate concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm. In all cases, if our staff are unsure, they know that they should always speak to the DSL/DDSL.
- All staff know what to look for to identify children who need help or protection.

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

## **5.2 The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)**

- For full details of the DSL/DDSL roles and responsibilities please refer to Part 2 & Annex C of Keeping Children Safe in Education 2022.
- The DSLs are members of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- Our DSL/DDSL(s) have received the appropriate safeguarding training to provide them with an understanding of their role and the knowledge and skills to carry it out. Our DDSL(s) are trained to the same level as the DSL. Training received also supports their knowledge of the processes, procedures, and responsibilities of other agencies, particularly children's social care in line with Working Together to Safeguard Children 2018. This training is updated at least every 2 years and in addition to this they regularly (at least annually) refresh and update their knowledge and skills. The DSL is given additional time, funding, training, resources, and support needed to carry out the role effectively.
- Our DSLs takes the lead responsibility for safeguarding and child protection (including online safety), and this is explicit in their job description. During term time, the DSL/DDSL is available (during school hours) for staff in the school to discuss any safeguarding concerns. The DSL can delegate activities to the DDSL(s); however, the ultimate responsibility remains with them, and this lead responsibility is not delegated. In the absence of the DSL the DDSL(s) will take a lead on safeguarding with clear direction from the Senior Leadership Team.
- The DSL acts as a source of support, advice, and expertise for staff. Risk assessments/safety plans will be completed as required and should, where appropriate, involve other agencies, these are reviewed regularly and shared appropriately.
- Our DSL maintains robust systems to monitor and record training of all staff and update and refresher time scales are evident within the training record. Training is delivered in-line with local authority safeguarding partnership and KCSIE 2024. This will include bulletins, briefings, and inset day training as well as external events attended.
- The DSL ensures that all staff and regular visitors have appropriate safeguarding training to equip them for their role in school.
- The DSL ensures systems are in place to induct new staff/associate governors are robust and monitored and any non-compliance shared with Senior Leadership Team/Governing body.
- The DSL monitors the electronic case management system CPOMS to record concerns about children, ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storing of information are kept in-line with the Data Protection Act 2018 and General Data Protection. The safeguarding and child protection records are kept in a secure location, away from academic records and there is a clear recording process of transfer, in or out, which if paper file transfer, using the transfer of records form which is signed by the sending and receiving settings and a copy of this form kept by both.
- When a parent chooses to remove their child/ren from school to receive EHE (Elective Home Education), the DSL will pass on any safeguarding concerns and the safeguarding file if there is one, to the EHE Team within DSPP and inform other professionals who may be involved with that child.
- Supervision sessions are available from the trust safeguarding lead to support DSL's and their wider safeguarding teams. Frequent visits allow the opportunity for open discussion and support alongside telephone/email availability which provides where possible a more immediate response.
- Safeguarding staff meet frequently but two-weekly as a minimum to discuss challenging cases and support each other.
- The DSL/DDSL will refer cases of suspected abuse to the local authority children's social care, as required, and support other staff to make these referrals.
- We understand the importance of attending case conferences and core group meetings as well as Child in Need meetings

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

- DSL will liaise with all staff (e.g., pastoral staff, school nurses, SEN staff and Mental Health Leads) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- The DSL/DDSL will represent school at child protection conferences and core group meetings and will be the expert within our setting to support staff in liaising with other agencies, making assessments and any referrals.
- Any staff member may be required to be part of strategy discussions with other interagency meetings and contribute to the assessment of child/ren.
- The DSL/DDSL/attendance officer will ensure that children's social care is notified if a child with a child protection plan is absent.
- The DSL/DDSL helps to promote educational outcomes by sharing appropriate information about the welfare, safeguarding and child protection issues that children (including children with or who have previously had a Social Worker) are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the schools and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- The DSL has a good understanding of the community the school serves, the risks and its resilience. Through Operation Encompass we look to support children and parents with incidents of Domestic Abuse and Anti-Social behaviour. Liaison with local police and safeguarding forums support contextual safeguarding.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school's

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

If the DSL and DDSL are not available, a member of the senior leadership team or safeguarding team will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will also:

- Keep the Headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Understand and follow the DfE guidance to sexual violence and sexual harassment in schools and colleges <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL are set out in their job description

### 5.3 The Trust Board

The Trust 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
- Evaluate and approve this policy at each review, ensuring it complies with the law and holds the headteachers 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

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

- Appoint a lead trustee for safeguarding and associate link governors on each academy committee to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure 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
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness [DfE's filtering and monitoring standards](#),
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
  - 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). Please see the Trust Allegations of Abuse Against Staff policy for more information.
  - That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - 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
- All trustees and associate governors will read Keeping Children Safe in Education in its entirety.
- Section 15 of this policy has information on how trustees and associate governors are supported to fulfil their role.

### 5.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (Please see Allegations of Abuse Against Staff Policy, appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

### 5.5 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.

They should also identify and engage with key professionals, e.g., DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

## 6. Confidentiality

The Invictus Education Trust needs to collect personal information to enable us to educate our children, and to carry out our everyday business functions/activities. Such data is collected from children, parents/carers, employees, customers, suppliers etc.

The data includes (but is not limited to), name, address, email address, data of birth, IP address, identification numbers, private and confidential information, sensitive information such as medical and bank/credit card details etc. In addition, we may be required to collect and use certain types of personal information to comply with the requirements of the law and/or regulations. However, we are committed to processing all personal information in accordance with the General Data Protection Regulation (GDPR), UK Data Protection Laws and any other relevant the data protection laws and codes of conduct (herein collectively referred to as “the data protection laws”).

The trust has procedures, controls and measures to ensure maximum and continued compliance with Data Protection laws and principles, including staff training, procedure documents, audit measures and assessments. Ensuring and maintaining the security and confidentiality of personal and/or special category data is one of our top priorities and we are proud to operate a 'Privacy by Design' approach, assessing changes and their impact from the start and designing systems and processes to protect personal information at the core of our business.

### Staff will understand:

- Child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that anything being released into the public domain does not compromise evidence.
- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
- There’s no definitive answer, because even if a victim doesn’t consent to sharing information, staff may still lawfully share it if there’s another legal basis under the UK GDPR that applies
- The DSL will balance the victim’s wishes against their duty to protect the victim and other children
- The DSL will consider that:
- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children’s social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

### Regarding anonymity, all staff will:

- 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

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

- 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
- Refer to the government's information sharing practitioners (7 golden rules) for sharing information, and will support staff who have to make decisions about sharing information.

The government's [information sharing advice for safeguarding practitioners](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

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

## 7. Recognising abuse and taking action

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Call the Police immediately on 999.

Make a referral to children's social care and/or the police **immediately**. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

<https://www.gov.uk/report-child-abuse-to-local-council>

### 7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

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

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her
- Observes physical signs which appear to show that an act of FGM has been carried out
- Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.
- **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.
- The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
- **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

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

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

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

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

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

#### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision 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.

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

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

### **Early Help Assessment**

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

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

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

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from school, care or from home.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug or alcohol misuse, adult mental health issues and domestic abuse.
- is misusing alcohol or other drugs themselves.
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child and
- The DSL ensures that all staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL/DDSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. Guidance documents can be accessed through the local authority early help strategy and threshold guidance.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- Has a parent or carer in custody, or is affected by parental offending
- Is frequently missing/goes missing from education, home or care

If a referral is deemed necessary to escalate beyond early help the DSL will follow escalation procedures:

### **Child in Need (Section 17)**

If the DSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will speak with parents/child and obtain their consent for referral to local authority MASH or the appropriate social care team if a different authority, to request an assessment.

If parents refuse to give consent, but the child's needs are not being met, the DSL will discuss these issues with MASH.



Appropriate school staff will attend Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require Section 17 services.

### **Child Protection (Section 47)**

If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they make enquires under Section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare. This duty also applies if a child is subject to an emergency protection order (under S44 of the Children Act 1989) or in police protective custody (under S46 of the Children Act 1989). Children's Services will convene an Initial Child Protection Conference (ICPC) once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference (RCPC) will take place once a child has been made the subject of a Child Protection Plan to monitor the safety of the child and the required reduction in risk.

Between conferences regular meetings of a core group will take place to monitor the progress of the child protection plan. The DSL/DDSL (sometimes other staff members) will attend the child protection conference on behalf of the school. The person attending will have as much relevant and up to date information about the child as possible. They will contribute to a recommendation on the risks/protective factors for the family from their information and a view on the need for a child protection plan. We understand the importance of our attendance and contribution at these conferences and whether we attend or not we know that there is a requirement to complete a report containing these contributions.

Child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved and will work in an open, honest, and transparent way with any parent whose child has been referred to MASH or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents/carers, wherever possible. 10.

Escalation process: The local authority safeguarding children board expects members of staff working directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues within agencies, and between agencies, provides a healthy approach to the work. This process will be kept as simple as possible and the aim will be to resolve difficulties at a professional practitioner level, wherever possible and always in a restorative way.

We recognise that differences in status and experience may affect the confidence of some workers to pursue this course of action, and support should be sought from the DSL/DDSL. If we believe that concerns regarding a child are not being addressed and outcomes are not improving, we understand the expectations that we will escalate our concerns in line with the Professional Challenge and Resolution Policy until a satisfactory conclusion is reached. When we use professional challenge and/or the escalation process we will set out clearly what we want to achieve as a result of the challenge/escalation, what we expect to happen and the desired outcome.

### **7.5 If you have concerns about extremism**

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

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

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

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and trustees/associate governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

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

### 7.6 If you have a concern about mental health

- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.
- If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.
- All staff have accessed a basic level of mental health training.
- Our schools have dedicated mental health leads
- Our mental health provision consists of a tiered system which staff, children and parents understand
- Our children can access a level of support which fits and meets individual needs
- We provide support and care to ensure our children achieve the best possible outcomes despite adversity

### Pastoral Support/Mental Health Support



**Tier 1 Universal Support**  
Support at this level is a low level intervention which is bespoke to the pupil. This includes addressing the pupil's level of need with a solution focused approach. It could include calling parents in, introducing buddies or reducing pressures. All members of staff are mental health trained (Safer Schools App), so whoever the pupil chooses as their trusted adult will be able to support. Pupils all have access to the pastoral team and the Pastoral Room is open at lunchtimes.

**Tier 2: Teachers would complete a RAP Pastoral Sheet**  
Pastoral support including but not limited to: drawing and talking therapy, 1:1 sessions, lunchtime sessions group work, confidence sessions, 1:1/small group Forest School etc. Parents/careers would be spoken to about the concerns and any referrals to School Nurse/MHST/other agency support completed.

**Tier 3:**  
Support at this level: Mental Health Support Teams, bank of services to get involved 'resources directory', numbers to give to parents etc.


**Tier 4:**  
Support at this level: GP services, CAMHS (this referral can come from GP (via parents) or school, Inclusion Support- Educational Psychologist

**Tier 5:**  
Crisis Team intervention when a child is believed to be at risk



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### Targeted Support: Mental Health

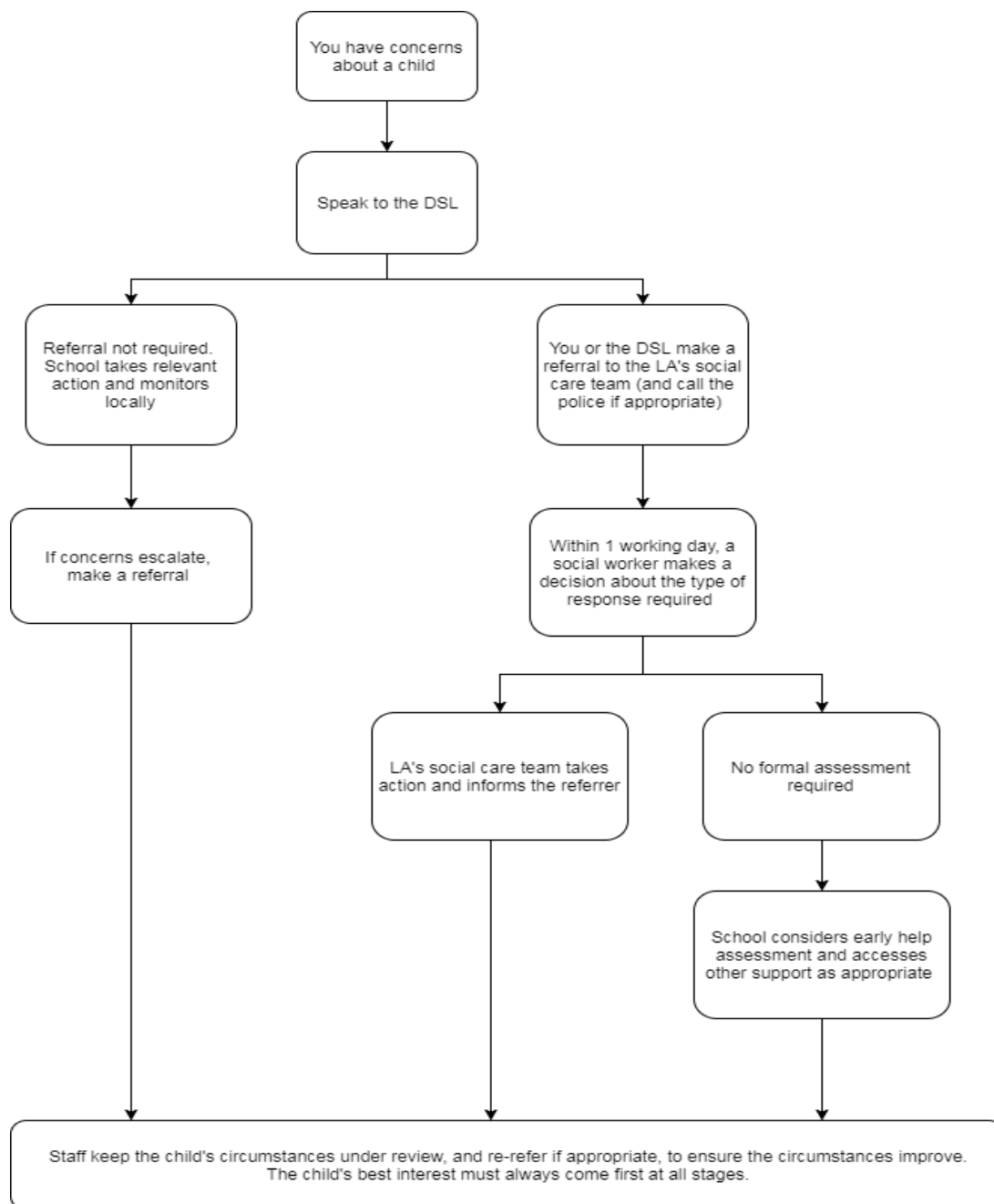


**Whole School Ethos**

Tier 1	Tier 2	Tier 3	Tier 4
<b>Universal Support:</b> Assemblies Displays/helplines PSHE curriculum Class teacher/TA support Mental health for parents and community	<b>Low Level Concerns:</b> Daily check-ins Specific support from Class Teacher/TA School Nurse drop in Regular work with Pastoral Team Safe space Class/small group work from Mental Health Support Teams	<b>Medium Level Concerns:</b> Mental Health Support Team referral GP/Medical Professional Targeted approach and bespoke programme of support	<b>High Level Concerns:</b> Support at this level usually involves responding to complex or specific mental health needs requiring intervention from CAHMS.

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



**7.7 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the Trust’s Director of Education: P. Harris, [pharris@invictus.education](mailto:pharris@invictus.education)

The Headteacher/Trust’s Director of Education will then follow the procedures set out in the Allegations of Abuse Against Staff Policy, if appropriate and record the concerns on CPOMs Staff Safe to maintain an ongoing record.

Should staff have concerns surrounding the management of allegations made against staff they should contact the Director of Human Resources: S. Webb, [swebb@invictus.education](mailto:swebb@invictus.education)

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO) **and** the Director of Human Resources: S. Webb, [s.webb@invictus.education](mailto:s.webb@invictus.education)

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation and the Director of Human Resources: S. Webb, [s.webb@invictus.education](mailto:s.webb@invictus.education)

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Allegations of Abuse Against Staff Policy for more detail).

### **Inappropriate behaviour by staff/supply staff/volunteers could take the following forms:**

- Physical - For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.
- Emotional - For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability, or sexuality.
- Sexual - For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault, and rape.
- Neglect - For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.
- Spiritual Abuse - For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

If a child makes an allegation about a member of staff, supply staff, trustee/associate governor, visitor or volunteer the Headteacher must be informed immediately. The Headteacher must carry out an urgent initial consideration to establish whether there is substance to the allegation and inform the Director of Human Resources: S. Webb, [swebb@invictus.education](mailto:swebb@invictus.education).

The Headteacher should not carry out the investigation him/herself or interview children. The Headteacher will exercise and be accountable for their professional judgement on the action to be taken as follows: If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the Headteacher will notify the Local Authority Designated Officer (LADO) and the Director of Human Resources S. Webb, [swebb@invictus.education](mailto:swebb@invictus.education). The LADO will liaise with the Headteacher and advise about action to be taken and may initiate internal referrals within the Local Authorities Children's Social Care to address the needs of children likely to have been affected

If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil, this should be discussed with the Director of Human Resources: S. Webb, [swebb@invictus.education](mailto:swebb@invictus.education) (staff) or Trust Safeguarding Lead: A. Jackson, [ajackson@invictus.education](mailto:ajackson@invictus.education) (pupils).

If the Headteacher decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of the conclusion, and the reasons for the decision should be discussed with the Director of Human Resources: S. Webb, [swebb@invictus.education](mailto:swebb@invictus.education) and recorded on the child's safeguarding file.

Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers). In no circumstances will our school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO and the Director of Human Resources: S. Webb, [swebb@invictus.education](mailto:swebb@invictus.education) to determine a suitable outcome.

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

The Headteacher will discuss with the agency and the Director of Human Resources: S. Webb, [swebb@invictus.education](mailto:swebb@invictus.education) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Where an allegation has been made against the Headteacher then the Director of Education: P. Harris, [pharris@invictus.education](mailto:pharris@invictus.education), takes on the role of liaising with the LADO in determining the appropriate way forward.

Where the allegation is against the sole proprietor, the referral should be made to the LADO directly.

### **7.8 Allegations of abuse made against other pupils**

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

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

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, voyeurism or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

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

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

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

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

All child-on-child abuse, bullying and discriminatory behaviour will be investigated and actioned aligned to our positive conduct policy. All incidents will be recorded on CPOMS and investigated by SLT/Safeguarding Team. Parents/Carers will be informed. Support will be offered for both the perpetrator and the victim as well as any other children affected as necessary and appropriate. Support and consequences for the perpetrator will be age-appropriate and will be in line with our Positive Conduct Policy.

Where necessary, a monitoring process will be implemented where the victim will be monitored weekly by a member of staff, usually their class teacher with the support of the safeguarding team. After a period of time (minimum 2

weeks maximum 6 weeks) the DSL/DDSL will speak to the victim and if satisfied with the resolution and no further issues have taken place will close the case. Parents and victims will be included in the case closure decision.

### **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate children about appropriate behaviour and consent in an age-appropriate way
- Ensure children are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(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 doesn’t (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, taking into account whether:

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

## 7.9 Sharing of nudes and semi-nudes (‘sexting’)

[guidance from the UK Council for Internet Safety](#)

### Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

#### You must not:

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

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

### Initial Review Meeting

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

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- 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

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

- The DSL has reason to believe a child 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 Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

### **Informing Parents/Carers**

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

### **Referring to the Police**

If it is necessary to refer an incident to the police, this will be done through the local neighbourhood police (101).

### **Recording incidents**

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

### **Curriculum coverage**

Pupils are taught about the issues surrounding online safety, consent and boundaries as part of our PHSE, Relationships education and computing programmes. All issues are covered in an age-appropriate way.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

### **7.10 Reporting systems for our pupils**

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

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

To achieve this, we:

- Ensure children understand they have a platform of support and a team of highly skilled people who are on hand should they need to disclose or talk through personal challenges
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback



Our whole school approach to building positive relationships and having a restorative approach in school help ensure our pupils will feel safe in submitting any concerns. Staff also know how to reassure children following any disclosure.

## 8. Online safety and the use of mobile technology

### Online Safety, meeting the digital and technology standards

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

We understand that meeting the minimum statutory digital technology requirements does not protect a school or MAT from digital risk in today's climate. We therefore ensure systems and solutions are securely in place which provide a complete online safety infrastructure that protects our whole school community. These systems have been carefully engineered by specialist teams to ensure these systems are robust in keeping our communities safe online:

Filtering and monitoring processes:

- We commission specialists to deliver against the 4 factors needed for maximum safety and rich, age-appropriate online learning.
- Real-time filtering ensures there is never a delay between dangerous content going live and the filters' ability to block it.
- All content is textually analysed as it streams to the user so over blocking is eliminated.
- Safety features apply to devices belonging to our school/MAT whether in school or remove.
- Proactive real-time monitoring captures activity as it happens
- Captures activities on and offline which may indicate risks outside of the web browser such as word documents, messaging apps or encrypted "dark web" browser.
- 24/7 moderators make contact by phone for urgent risks and review captured texts to minimise false positives.
- Alerts are sent in real-time by phone, email, and stored within the intuitive portal for review.

Additional online safety measures to protect our whole school community:

- Online safety leads are safeguarding trained and complement online safety provision
- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and trustees/associate 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

It is essential that children are safeguarded from harmful online content and wider online harms and take a whole school approach that protects, empowers and educates children and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

We believe that safeguarding works best when it's an entire school community approach. School leaders will update parents to build an understanding of the shared responsibilities of parents to educate and support their children, and of the school to ensure the welfare of all children. This includes the need for referrals to other agencies in some situations and the way we both filter and monitor online content on academy devices.

We ensure that children are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum including the DfE's *Teaching Online Safety in School*: <https://www.gov.uk/government/publications/teaching-online-safety-in-schools/teaching-online-safety-in-schools> and the four areas of risk in *Keeping Children Safe in Education*: content, contact, conduct and commerce.

The trust safeguarding lead and Information Technology (I.T.) lead, work in collaboration to ensure online safety provision is securely embedded in the curriculum. I.T. teaching staff have completed online safety training and support the safeguarding provision withing the technology arena.

#### 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're a witness rather than a victim
- Understand how to use CEOP
- Online safety features throughout the I.T. curriculum
- Safeguarding and I.T. lead work collaboratively in planning the curriculum and responding to online concerns
- Online safety is taught through our PSHE curriculum
- Equip our children with safeguarding advice, guidance and helplines to access when not in school
- 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
- 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 and volunteers 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.
- We have an online safety policy which identifies the usage and expected behaviour of children/children. As a school we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding. Education at home/Remote learning: - Where children are being asked to learn online at home, our school will refer to and use the links

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

and resources provided by the DfE; Safeguarding in schools, colleges and other providers and safeguarding in remote education.

- 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, in order 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

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

### Guidance Documents:

- Government publications – teaching online safety in schools
- Children's Commissioner-Online Safety
- Teaching online safety in education settings
- Appropriate Filtering and Monitoring
- CEOP-Safety Centre
- National Cyber Security Centre
- NSPCC-Undertaking remote teaching safely
- 360 Degree Safe - Online Safety Review Tool
- UKCCIS-UK Council for Child Internet Safety

## 9. Working with parents and carers

We are committed to working in partnership with parents/carers to safeguard and promote the welfare of their children, and to support them to understand our statutory responsibilities in this area.

When new children join our school, parents/carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the school website. Parents/carers will be informed of our legal duty to assist our safeguarding colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to the relevant local authority or other agencies.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a child from harm.

We will seek to share with parents/carers any concerns we may have about their child before making a referral, unless to do so may place a child at increased risk of harm.

A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL from making a referral to the local authority in those circumstances and where it is appropriate to do so.

To keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and at least 2 contacts
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).
- Any legal or criminal changes which effects parental responsibility e.g., bail conditions, court orders, Special Guardianship orders, Child arrangement orders etc

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

The school will retain this information on the pupil file. The school will only share information about children with adults who have parental responsibility for a child or where a parent has given permission and the school has been supplied with the adult's full details in writing.

We recognise that we are likely to be in regular contact with parents and carers. We will use these communications to reinforce the importance of children being safe online and parents/carers are likely to find it helpful to understand what systems schools use to filter and monitor online use. It will be especially important for parents/carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Our school's update parents about safeguarding through letters, emails (both cohort specific and general advice and guidance) and the school's website.

### 9.1 Notifying Parents or Carers

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

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

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

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g., moving them out of classes with the victim, and the reason(s) behind any decision(s)

## 10. Children with Special Educational Needs, Disabilities or Health Issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

We recognise that children with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers.

Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEN, disabilities 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
- 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

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

We offer pastoral support for these pupils. This includes:

- Speech and Language intervention and total communication strategies including PECS cards
- Access to our Pastoral Space
- Specific interventions including nurture groups
- Access to the School Wellbeing Dog
- Support at lunchtimes/breaktimes
- Restorative approach across school

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

### **11. Children with a Social Worker**

Children 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 child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child'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
- All absence will be reported to allocated social worker by email
- All staff understand the need to offer an extra layer of care for vulnerable and wider vulnerable children
- All staff understand the need for extra scrutiny with academic progress to eliminate disadvantaged children underachieving
- All staff understand the need to ensure disadvantaged children have every opportunity to achieve the best possible outcomes
- The provision of pastoral and/or academic support

### **12. Pupils who are lesbian, gay, bisexual or gender questioning**

The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. Our whole school approach to building positive relationships and having a restorative approach in school help ensure our pupils will feel safe in sharing their concerns or worries.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children. When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will

also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out.

### **13. Looked-After and Previously Looked-After Children**

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

A designated teacher 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

### **14. Complaints and Concerns About School Safeguarding Policies**

#### **14.1 Complaints against staff**

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

#### **14.2 Other Complaints**

We encourage and pride ourselves on the collaborative working we do with our children and families. We foster an environment where all stakeholders have access to key members of staff to raise any concerns they have and access appropriate levels of support.

We have robust internal investigation processes and systems to follow in the event of complaints and are guided by professionals within the Trust. Our complaints policy states clearly the various stages of complaint and where to escalate concerns following completion and outcome of our complaints process. Our complaints policy is available on our trust website for parents/carers and is also available on request.

Safeguarding concerns should be raised with school immediately.

If a concern means a child is at immediate risk, then the individual needs to contact the Police on 999 immediately and contact local authority child protection partnership. All visitors are given safeguarding information which outlines how to share concerns and code of conduct expected by visitors/contractors.

#### **14.3 Whistleblowing**

The Invictus Education Trust Board of Trustees are committed to the highest possible standards of honesty and integrity, and we expect all staff to maintain these standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct.

A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur. We encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected. We provide staff with guidance on how to raise concerns, reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

The whistleblowing policy applies to all employees of the trust, members, trustees, associate governors, consultants, contractors, casual and agency staff and volunteers.

## 15. Record-keeping and information sharing

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

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

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

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

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

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

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

CPOMS is our preferred safeguarding software package where all incidents of safeguarding, child protection records and concerns for our children are recorded electronically. Information is recorded in a central repository where relevant people are alerted immediately and where chronological reports can be produced for vulnerable children. Child protection information will be stored and handled in line with the principles set out in the Data Protection Act (2018) and the GDPR (2018) and the trust **Data Protection Policy** which can be found on our website.

*The Data Protection Act* and *GDPR* do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will never be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

Paper records of concern forms and other written information will be stored in a locked facility accessed only by the DSL and those identified as appropriate within the school. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access.

Child protection information will be stored separately from the pupil's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy, they will be sent separate from the pupil's file and under a confidential cover or in an encrypted electronic file.

Child protection records are normally exempt from the disclosure provisions of the *Data Protection Act*, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Principal or DSL. The *Data Protection Act* does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Link to data protection tool kit for schools:

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 16. Training

### 16.1 All Staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, *Prevent*, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff briefings and training sessions).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training.

### 16.2 The DSL And DDSL

The DSL and DDSL's 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).

They will also undertake Prevent awareness training.

### **16.3 Trustees and Associate Governors**

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

### **16.4 Recruitment – Interview Panels**

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

See Appendix 2 of this policy for more information about our safer recruitment procedures.

### **16.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## **17. Monitoring Arrangements**

This policy will be reviewed **annually** by the Head of Safeguarding, Behaviour and Attendance. At every review, approval will be required from the Invictus Education Trust Board of Trustees.

## **18. Links with other policies**

This policy links to the following policies and procedures:

- Positive conduct
- Child on child abuse and anti-bullying
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Relationships and sex education
- Curriculum
- Data Protection Policy and Privacy notices

## **19. Site Security**

At our school's we provide a secure site which is controlled by precise management directives, but the site is only as secure as the people who use it. All people on our site must adhere to the rules which govern it. Laxity can cause potential problems with safeguarding, therefore:

- Gates are kept closed during the school day
- visitors gain access through the main entrance.

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

- Visitors, volunteers, and children must only enter through the main entrance and after signing in at the office will be issued with a school lanyard or visitor's pass.
- School has a clear system of ensuring staff are accompanied / supervised by regulated staff member. Any visitor on site who is not identifiable by a visitor's pass will be challenged by any staff member and this will be reported to a member of the Senior Leadership Team.
- Parents, carers, and grandparents attending functions have access only through the designated and supervised entrances, with tickets for visitors for appropriate school events.
- Children will only be allowed home with adults with parental responsibility or confirmed permission.
- Empty classrooms should have closed windows and doors.
- Children should never be allowed to leave school alone during school hours unless collected by an adult such as a parent who is doing so for a valid reason. They should report to the office to do this.
- There is a rota for break and lunch time duties to ensure the safety and welfare of children
- A health and safety audit are completed annually with risk assessment/safety planning This will include a fire evacuation and Prevent risk assessment.
- The risk management of site security is managed by school senior leaders and the Trust overseen by the Invictus Education Trust Board of Trustees, and we have a clear system of risk assessments and review timescales of these

*Please see overleaf for appendices.*

These appendices are based on the Department for Education's statutory guidance, **Keeping Children Safe in Education**.

## Appendix 1: Types of Abuse

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

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

## Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures

Please see Safer Recruitment Policy

## Appendix 3: Allegations of Abuse Made Against Staff

Please see Allegations against staff (including low-level concerns) policy

## Appendix 4: Specific Safeguarding Issues

### Keeping Children Safe in Education 2024

All staff have an awareness of the following safeguarding issues through regular training and briefings. Staff are aware that these behaviours’ can make children vulnerable and put them in danger and that often these issues overlap.

- Abuse (incl Physical/Emotional/Sexual/Neglect) Annex 1
- Behaviours linked to safeguarding issues
- Bullying including cyberbullying
- Child on child abuse (inc sexual violence and sexual harassment/sexting-sharing of nude/semi-nude images & voyeurism)
- Children and the court system
- Children absent from education
- Child missing from home or care
- Child Criminal Exploitation (CCE)
- Child sexual exploitation (CSE)
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Homelessness
- Mental health
- Online safety
- Private fostering
- Prevent Duty and Channel
- Serious violence
- Trafficking

### Top five safeguarding concerns

We identify our top five safeguarding concerns linked to demographic context, national issues and extra familial harms. These are regularly reviewed and a robust response is implemented to support the protection of our children and communities.

Top five Safeguarding concerns	Responses are not exhaustive
Domestic abuse	<ul style="list-style-type: none"> <li>• Work with Operation Encompass – this is shared with parents/carers.</li> <li>• Monitoring and support from class teacher/TA.</li> </ul>

	<ul style="list-style-type: none"> <li>• Pastoral support for child/children and further referrals where appropriate.</li> <li>• Building supportive and open relationships with parents/carers.</li> <li>• Early Help Offer.</li> <li>• Referrals to Black Country Women’s Aid or other appropriate agencies.</li> </ul>
<b>Neglect</b>	<ul style="list-style-type: none"> <li>• Vigilant staff who are aware of who know our children well.</li> <li>• Robust recording of any concerns on CPOMS.</li> <li>• Open and honest restorative conversations with parents/carers.</li> <li>• Financial support through hardship vouchers where appropriate.</li> <li>• Early Help offer. Referral to ‘Front Door’ with Help and Support Form</li> </ul>
<b>Attendance</b>	<ul style="list-style-type: none"> <li>• Five-tiered response</li> <li>• Interventions and support which are data driven</li> <li>• Collaborative working with parents/carers and children’s services</li> <li>• Curriculum/timetabling changes to support attendance on Mondays and Fridays</li> </ul>
<b>Online safety</b>	<ul style="list-style-type: none"> <li>• Smoothwall filtering and monitoring</li> <li>• Robust online safety curriculum</li> <li>• Assemblies/workshops</li> <li>• Online safety parenting programme</li> <li>• Trust safeguarding lead is a CEOP education ambassador</li> <li>• CEOP reporting mechanism applied to websites</li> </ul>
<b>Mental health</b>	<ul style="list-style-type: none"> <li>• Mental health senior leaders</li> <li>• All staff have baseline mental health training</li> <li>• Mental health provision and school led early help</li> <li>• Safe space and nurturing provision</li> <li>• School wellbeing dog</li> <li>• PHSE Curriculum</li> <li>• Wellbeing walking KS2</li> </ul>

### Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety’s [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

#### Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- › Contacted by an online account that they do not know but appears to be another child or young person
- › Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- › Moved from a public to a private/E2EE platform
- › Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- › Offered something of value such as money or gaming credits
- › Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

### **Financially motivated incidents**

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- › Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- › Use images that have been stolen from the child or young person taken through hacking their account
- › Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- › Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- › Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- › Moved from a public to a private/E2EE platform
- › Pressured into taking nudes or semi-nudes
- › Told they have been hacked and they have access to their images, personal information and contacts
- › Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

### **Children who are absent from education**

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

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

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation 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 absent, such as travelling to conflict zones, FGM and forced marriage.

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

### **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. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

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

Indicators of CCE can include a child:

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

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

### **Child sexual exploitation**

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

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

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

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

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

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

### **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Voyeurism, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)



## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

### **Domestic abuse**

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

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

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

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

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

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

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and DDSL's will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

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

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

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

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

### FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### **Forced marriage**

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

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmw@fco.gov.uk](mailto:fmw@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 of a person legitimizing support for, or use of, terrorist violence
- › **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - Negate or destroy the fundamental rights and freedoms of others; or
  - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- › **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll 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 from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

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 section 7.5 of 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 Positive conduct Policy, PHSE and RHE Policy, Computing curriculum, Online safety lessons.

### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- Between two children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### **Serious violence**

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

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

### **Checking the identity and suitability of visitors**

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

## SAFEGUARDING AND CHILD PROTECTION POLICY V1.1

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times.

We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### **Non-collection of children**

If a child is not collected at the end of the session/day, schools will follow localised procedures.

### **Missing children**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

### **Safeguarding Contacts:**

Children's services – 0300 5550050

Out of hours emergency contact – 0300 555 8574 or call 999

### **National Contacts:**

Police (Non-emergency 101)

CEOP (Child Exploitation and Online Protection)

<https://www.ceop.police.uk/Safety-Centre/>