Company Registration Number: 10745840 (England and Wales)

Ethos Academy Trust

Safeguarding & Child Protection Policy

September 2025

ETHOS ACADEMY TRUST

Nurturing inclusive learning communities

1	**Summary**	EAT Safeguarding & Child Protection Policy			
2	**Responsible person**	CEO			
3	**Accountable ELT member**	CEO/CedO			
4	**Applies to**	☒All Staff ☐Support Staff ☐Teaching Staff			
5	**Trustees and/or individuals who have overseen development of this policy**	Trust Board, and DSLs.			
6	**Headteachers/Service Heads who were consulted and have given approval (if applicable)**	N/A			
8	**Ratifying committee(s) and date of final approval**	Trust Board 25th September 2025			
9	**Version number**	2.1			
10	**Available on**	Every	☒Y ☐N	Trust Website Academy Website Staff Portal	☒Y☐N ☒Y☐N ☐Y☒N
11	**Related documents (if applicable)**				
12	**Disseminated to**	☒Trustees ☒All Staff ☐Support Staff ☐Teaching Staff			
13	**Date of implementation (when shared)**	26th September 2025			
14	**Date of next formal review**	September 2026			
15	**Consulted with Recognised Trade Unions**	☐Y ☒N			

Date	Version	Action	Summary of changes
September 2022	1.3	Review	Update and revised policy

September 2023	1.4	Annual review	Additions to include all LAs
September 2024	1.5	Annual review	Updated policies to most recent versions Removed references to paper records Removed SMART plan
December 2024	1.6	Update	Update CEO, Chair of Trustees and named Trustee for Safeguarding details
January 2025	1.7	Update	Addition - Low Level Concerns - Appendix
February 2025	1.8	Update	Included Leeds Local Authority Safeguarding contact details
March 2025	1.9	Update	Appendix 14 added re: supporting pupils in the digital age Definitions of missing and the process of support Addition of child trafficking, non- recent abuse and modern slavery
September 2025	2.0	Annual review	Update policies to most recent versions Inclusion of the terms misinformation, disinformation and conspiracy theories Update Key safeguarding contact Update school safeguarding DSL/DDSL
September 2025	2.1	Update	Removed school based staff contacts Refers to KCSIE 2025

Key Safeguarding Contact Details

CEO	Chris Davis
Chair of Trustees	Graham Dewhirst
Named Trustee	Sarah Corbridge
Safeguarding and Behaviour Lead	Aimee Bedford

Provision Name	Contact Details
Engage Academy	01924 476449
Reach Academy	01924 478482
Ethos College	01924 469170
Elements Academy	01909 212231
Evolve Academy	01924 200752
Enrich Academy	01924 862232

Contents

1. AIMS 6
2. LEGISLATION AND STATUTORY GUIDANCE 6
3. DEFINITIONS 8
4. EQUALITY STATEMENT 8
5. ROLES AND RESPONSIBILITIES 9
6. CONFIDENTIALITY 12
7. OUR ROLE IN THE PREVENTION OF ABUSE 13
8. OUR ROLE IN SUPPORTING CHILDREN 15
8. RESPONDING TO DOMESTIC ABUSE 24
10. ATTENDANCE AND CHILDREN MISSING EDUCATION 26
11. A SAFER CULTURE 28
12. CHILD PROTECTION RECORDS 34

APPENDIX 1 - DEFINITIONS AND INDICATORS OF ABUSE 38
APPENDIX 2 - DEALING WITH A DISCLOSURE OF ABUSE 43
APPENDIX 3 - CHILD EXPLOITATION PARTNERSHIP ASSESSMENT AND DECISION-MAKING TOOL 44
APPENDIX 4 - CHILD-ON CHILD SEXUAL VIOLENCE AND SEXUAL HARRASSMENT DFE FLOW CHART 52
APPENDIX 5 - KSCP RADICALISATION RESPONSE CHECKLIST 59
APPENDIX 6 - MISSING FROM SCHOOL RESPONSE CHECKLIST 61
APPENDIX 7 - SUMMARY OF LADO FLOWCHART FOR KIRKLEES 62
APPENDIX 8 - SCHOOL PROCEDURE TO FOLLOW WHERE THERE ARE CONCERNS ABOUT A CHILD .. 64
APPENDIX 9 - EARLY SUPPORT MULTI AGENCY PANEL PROCESS 66
APPENDIX 10 - FURTHER CONTACT INFORMATION 67
APPENDIX 11 - KIRKLEES LOW LEVEL CONCERNS FLOWCHART 69
APPENDIX 12 - ROTHERHAM LADO THRESHOLD CRITERIA 70
APPENDIX 13 – LOW LEVEL CONCERNS 71
APPENDIX 14 - SUPPORTING PUPILS IN THE DIGITAL AGE 72

Overview

This Safeguarding & Child Protection Policy is available on our Academy and Trust websites and is reviewed and approved by the Trust Board annually.

This policy applies to all Academies/settings within Ethos Academy Trust.

Everyone working for Ethos Academy Trust shares an objective to help keep children and young people safe by contributing to:

• Providing a safe environment for children and young people to learn and develop in our school setting;

• Identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in our school settings.

Each child's welfare is of paramount importance. We recognise that some children may be especially vulnerable to abuse. We recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at our academies, behaviour may be challenging. We recognise that pupils may exhibit concerning behaviours and at times this may impact on other children either directly or indirectly. We will always take a considered and sensitive approach in order that we can support all of our pupils.

Part 1 of this policy is for all staff and Trustees

Part 2 is principally for use by Designated Safeguarding Staff, Safeguarding assurance partner, and senior leadership teams

1. Aims

The Trust aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- All staff are aware of their statutory responsibilities for safeguarding;
- Staff are properly trained in recognising and reporting safeguarding issues;
- A culture of vigilance is created and maintained to ensure that we will act in the best interests of children to protect them online and offline.
- Systems for reporting abuse are well promoted, easily understood and easily accessible for children.
- The Board of Trustees and staff of Ethos Academy Trust (hereinafter referred to as "our Trust") take as our priority the responsibility to safeguard and promote the welfare of our pupils, to minimise risk, and to work together with other agencies to ensure rigorous arrangements are in place within our Trust to identify, assess and support those children and young people who are suffering harm and to keep them safe and secure whilst in our care.
- The responsibilities set out in this policy apply (as appropriate) to all members of the Trust community including pupils, staff, trustees, visitors/contractors, volunteers, and trainees working within the school. It is fully incorporated into our academy's whole school ethos and is underpinned throughout the teaching of the curriculum, within Personal, Social and Health Education (PSHE) and the safety of the physical environment provided for the pupils.

2. Legislation and statutory guidance

- This policy is based on the Department for Education's statutory guidance Keeping children safe in education 2025 we comply with this guidance and the procedures set out by our Local Safeguarding Children partnership;
- This policy conforms to locally agreed inter-agency procedures and has been developed by Local Authority Services and Safeguarding Partners. It is available to all interested parties on the Trust website and the website of each individual setting. It should be read in conjunction with other relevant policies and procedures and Keeping Children Safe in Education

This policy is also based on the following legislation:

- Section 175 of the Education Act 2011 (legislation.gov.uk), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009 (legislation.gov.uk), which sets out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the The Education (Independent School Standards) Regulations 2014 (legislation.gov.uk), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

- The Children Act 1989 (and Children Act 2004 (legislation.gov.uk)), which provides a framework for the care and protection of children
- General Data Protection Act (2019) guide-to-the-general-data-protection-regulation-gdpr-1-1.pdf (ico.org.uk)

- Data Protection Act Data protection: The Data Protection Act - GOV.UK (www.gov.uk)

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

- Multi-agency statutory guidance on female genital mutilation - GOV.UK (www.gov.uk), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

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

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

- Statutory Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

- Guidance for safer working practice for those working with children and young people in education settings Professional and Personnel Relationships (saferrecruitmentconsortium.org)

- Kirklees Safeguarding Children Partnership Procedures https://www.kirkleessafeguardingchildren.co.uk/procedures-local-protocols-and-guidance/

- Wakefield Safeguarding Children Partnership Procedures https://westyorkscb.proceduresonline.com/index.htm

- Rotherham Safeguarding Children Procedures

  Homepage – Rotherham Safeguarding Children Partnership (rscp.org.uk)

- Bradford Safeguarding Children Procedures

  Safer Bradford - Children

- Calderdale Safeguarding Children Procedures

  Safeguarding Calderdale – Safeguarding children and adults in Calderdale

- Leeds Safeguarding Children Partnership

https://www.leedsscp.org.uk/

- Children Missing Education –) Children missing education: statutory guidance for local authorities and schools - GOV.UK

- *https://www.gov.uk/government/collections/online-safety-act*
- *Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024) - GOV.UK*
- *Mobile phones in schools - February 2024 (publishing.service.gov.uk)*
- *Alternative Provision Guidance February 2025*
- *Working Together To Improve School Attendance 2024*
- *Care Act 2014*
- This policy also complies with our funding agreement and articles of association

3. Definitions

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the 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 from suffering or being likely to suffer, significant harm;county

- **Children** include everyone under the age of 18. College students between the ages of 18 and 25 if they are considered at risk; for example, learners with learning disabilities, those in care or previously in care, those with an EHCP and those with mental health concerns are supported by adult services when reporting any Safeguarding concerns.

4. Equality statement

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

We give special consideration to pupils who:

- Have special educational needs or disabilities;
- Are young carers;

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- Have English as an additional language;
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- Pupils who are supported by external agencies such as social care and may be on specific plans, such as; section 17 or 47 or may be CLA.
- Are at risk of female genital mutilation (FGM), sexual exploitation, criminal exploitation, forced marriage, or radicalisation;
- Are asylum seekers, refugees or migrants.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff (including those not directly employed by this Trust, volunteers, and Trustees. Our policy and procedures also apply to extended school and off-site activities.

All staff

- All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping children safe in education 2025 (KCSiE) and review this guidance at least annually. The annual update will make reference to this policy to ensure national guidance is contextualised to our settings.

All staff will be aware of the following:

- Our systems that support safeguarding, including Guidance for Safer Working Practice, the role of the designated safeguarding lead (DSL) and the deputy designated safeguarding leads (DDSL), the behaviour and relational policy, and the safeguarding response to pupils who are absent from education;
- The early support process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- The process for making referrals to children's services and for statutory assessments that may follow a referral, including the role they might be expected to play. (See Appendix 8);
- The procedure to follow if they have concerns about a child's welfare.
- The procedure to follow if there is a safeguarding concern about a member of staff.
- Wherever possible, speak to the DSL, DDSL, or Head Teacher/Head of school/Head of school (in the absence of a DSL) first to agree on a course of action. In the absence of a DSL or Head Teacher/Head of school/Head of school being available, staff must not delay in directly contacting children's services or the police if they believe a child is at immediate risk of significant harm;
- We work in partnership with other agencies in the best interests of the children. Requests for service to children's services should (wherever possible) be made by the designated safeguarding lead. Where a pupil already has a child protection social worker, we will immediately contact the social worker involved or in their absence, the team manager of the child protection social worker;

- What to do if they identify a safeguarding issue or a pupil tells them they are being abused or neglected, including specific issues such as female genital mutilation (FGM), and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- That children's behaviours can be indicative of their emotional wellbeing and can be linked to mental health. They should be aware of behaviours that may communicate that poor wellbeing can may be an indicator of factors such as abuse, neglect or exploitation. Staff should understand the children's experiences such of abuse, neglect, trauma and adverse childhood experiences can impact on children's mental health, behaviour & education.
- Academy procedures for recording any causes for concern and passing information on to DSLs in accordance with Trust / academy recording systems; The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), female genital mutilation (FGM) and radicalisation.

Appendix 1 provides definitions of abuse.
Appendix 2 provides guidance to staff on how to handle disclosures.

The Designated Safeguarding Lead (DSL) and Deputy Designated Lead (DDSL):

- The DSL takes lead responsibility for child protection and wider safeguarding issues;
- During term time, the DSL will be available during academy hours for staff to discuss any safeguarding concerns;
- Out of school hours the DSL can be contacted via email or phone– see Key Safeguarding Contact Details, page 2;
- When the DSL is absent, the DDSLs will act as cover – see Key Safeguarding Contact Details, page 2;
- If the DSL and DDSLs are not available, the Head Teacher/Head of school or other senior leader will act as cover– see Key Safeguarding Contact Details, page 2.

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

- Respond to daily Operation Encompass notices when required;
- Provide advice and support to other staff on child welfare and child protection matters;
- Take part in strategy discussions and multi-agency meetings and/or support other staff to do so;
- Contribute to the assessment of pupils;
- Refer suspected cases, as appropriate, to the relevant body (children's services, Channel programme, and/or police), and support staff to comply with their mandatory reporting duties in cases where FGM has been identified;
- The DSL will ensure that all staff involved in direct case work of vulnerable pupils, where there are child protection concerns/issues, have access to regular safeguarding supervision;
- The DSL will also keep the Head Teacher/Head of school informed of any issues, and liaise with local authority officers and relevant professionals for child protection concerns as appropriate;
- We will ensure representation at appropriate multi-agency meetings such as initial and review child protection conferences, and planning and core group meetings, as well as multi-agency meetings;
- Provide reports as required for meetings. If we are unable to attend a meeting, a written report will be sent. Reports will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting;
- Where a pupil in our trust is subject to a multi-agency child protection plan or any multi-agency risk management plan, the DSL/DDSL will contribute to the preparation, implementation and review of the plan as appropriate.

The full responsibilities of the DSL are set out in Annex C of Keeping Children Safe in Education (KCSiE) – Role of the designated safeguarding lead. All designated safeguarding leads and deputy safeguarding leads must read and comply with this

Keeping children safe in education 2025

The Trust Board

- The trustees will approve this policy at each review and hold the Head Teacher/Head of school/ CEO to account for its implementation.

- The trustees will appoint a safeguarding assurance partner to monitor the effectiveness of this policy in conjunction with the full trust board. The DSL cannot also be the safeguarding assurance partner with responsibility for child protection.

- If an allegation of abuse is made against the Head Teacher/Head of school or CEO, the chair of trustees will act as the 'case manager'.

- The trust board, along with the CEO and academies' senior leadership teams, is responsible for satisfying themselves and obtaining written assurances from any relevant school lettings and alternative/off-site providers and provisions, that their safeguarding arrangements are secure and in keeping with KCSiE 2025. The trust will have written evidence of safeguarding arrangements when/if using alternative or off-site providers.

The full responsibilities of the trust board are set out in part two of KCSiE 2025 – The management of Safeguarding. All trust board should read part two of KCSiE 2025 in order to ensure that the school is fully compliant with their statutory safeguarding responsibilities

The Head Teacher/Head of school

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

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction;

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

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

- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly;

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;

- Ensuring the relevant staffing ratios are met, where applicable.

Please see Appendix 8 for Summary of School Procedure to Follow Where There Are Concerns about a Child.

6. Confidentiality

- Confidentiality is an issue that needs to be understood by all those working with pupils, particularly in the context of safeguarding.

- This trust recognises that the only purpose of confidentiality in this respect is to benefit the pupil. Staff, volunteers, and visitors to the Trust should never promise a pupil that they will not tell anyone about an allegation or disclosure. Staff must pass any cause for concern immediately to a DSL.

- Confidentiality is addressed throughout this policy with respect to record-keeping (section 6), dealing with disclosure (Appendix 2), allegations of abuse against staff (section 11), information sharing and working with parents (section 6).

- Confidentiality applies to all cases of safeguarding and in particular in the case of pregnant pupils. Safeguarding measures are adhered to in all cases, as are all aspects of GDPR. However, the safety and wellbeing of the pupil is paramount and will be at the centre of all actions taken.

Record Keeping, Information Sharing and GDPR

- Timely information sharing is essential for effective safeguarding. Our trust will share safeguarding information as appropriate in keeping with the principles outlined in the government guidance document, Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE 2018). This guidance has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.

- All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing or electronically. Information will be kept confidential and stored securely. Records will include:

    1. A clear comprehensive summary of the concern;

    2. Details of how the concern was followed up and resolved;

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

- The storing and processing of personal data is governed by the General Data Protection Regulations 2017 (GDPR) and Data Protection Act 2018. Our Trust will give clear advice to staff about their responsibilities under this legislation so that, when considering sharing confidential information, those principles should apply. The DPA and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

- Staff should never promise a pupil that they will not tell anyone about a disclosure, as this may not be in the pupil's best interests.

- If staff are in any doubt about sharing information, they should speak to the DSL/DDSL.

- Staff may have access to special category personal data about pupils and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them.

Working with parents and other agencies to protect children

Parents/carers should be aware that our trust will take appropriate action to safeguard the welfare of its pupils. In cases where the trust has reason to be concerned that a child may be suffering significant harm, ill treatment or neglect, or other forms of harm, staff have no alternative but to follow the local authority children's services and contact the relevant safeguarding team to discuss their concerns.

In keeping with KCSiE 2025 and Children Missing in Education: statutory guidance for local authorities. We will endeavour wherever possible to obtain at least two emergency contacts for every pupil in the school in case of emergencies, and in case there are welfare concerns at the home or contextually.

In general, we will discuss concerns with parents/carers before approaching other agencies and will seek to inform parents/carers and receive their consent when making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents/carers of a referral to another agency may increase the risk of significant harm to the pupil.

Parents/carers are informed about our safeguarding policy through trust procedures, academy websites, newsletters etc. A safeguarding and child protection statement is prominent in each academy's reception area.

Multi-agency work

We will co-operate with local authority services in accordance with the requirements of the Children Act and allow access to pupil and child protection records for them to conduct section 17 or section 47 assessments.

In the best interests of our pupils, we will work with all relevant professionals and agencies as required to safeguard children and promote their welfare.

7. Our role in the prevention of abuse

Ethos Academy Trust plays a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for discrimination against all protected characteristics.

We will identify and provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their safety and well-being.

As part of providing a broad and balanced curriculum, the PSHE/RSHE curriculum with reflect the statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE 2025). Relevant issues identified will be addressed through the PSHE curriculum to ensure it is needs led. Some of these include self-esteem, emotional literacy, assertiveness, power, relationships and sex education, online safety, online bullying, sexting, child exploitation (CSE/CCE), sharing nudes and semi-nudes, female genital mutilation (FGM), preventing radicalisation, child on child abuse, consent, anti-bullying, unhealthy and abusive family relationships.

The curriculum

The trust understands the importance of delivering an effective safeguarding curriculum which includes:

1. Healthy and respectful relationships.

2. Boundaries and consent.

3. Stereotyping, prejudice, and equality.

4. Body confidence and self-esteem, wellbeing and resilience.

5. How to recognise an abusive relationship, including coercive and controlling behaviour.

6. 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.

7. What constitutes sexual harassment and sexual violence and why these are always unacceptable.

Online safety

Ethos Academy Trust is committed to meeting the requirement to keep pupils safe when using technology. We believe the whole trust community can benefit from the opportunities provided by the internet and other technologies used in everyday life. The trust's Online Safety Policy supports this by identifying the risks and the steps we are taking to avoid them. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content; for example, pornography, fake news, misinformation, disinformation, conspiracy theories, alt5ernatracism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
Contact: being subjected to harmful online interaction with other users; for example, 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; for example, 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.

Our trust's expectations for responsible and appropriate conduct are set out in the Online Safety Policy and Acceptable Use Policies (AUP), which we expect all staff and pupils to follow.

A key area to consider in the revised guidance from KCSIE 2025 and the increased emphasis on filtering and monitoring. Below are the areas to consider and for key staff to be responsible for:

- Promote an awareness and commitment to online safety throughout the trust
- Provide updates to the DSLs and/or liaise with technical staff on online safety issues
- Develop an understanding of current online safety issues, guidance and appropriate legislation through regular training
- Ensure that online safety education is embedded across the curriculum
- Ensure that online safety is promoted to parents and carers
- Ensure that any person who is not a member of trust staff, who makes use of the trust ICT equipment in any context, and new starters within the trust are made aware of the acceptable use policy

- Monitor and report on online safety issues to the leadership team and the safeguarding/online safety Trustee as appropriate
- Ensure an online safety incident log is kept up to date on CPOMS
- Ensure that good practice guides for online safety are displayed in classrooms and around the trust
- Promote the positive use of technologies and the internet
- Contribute to the review of the trust online safety policy and acceptable use policies at prearranged time intervals.
- Take appropriate steps to ensure filrtering and moitoring of websites are in place and regularly check whether the filters work
- Ensure provisions aare in place to detect misuse of the intrnet and ensure appropriate follow up is carried out and that parents, SLT and trustees are informed

The trust also has a responsibility to:

- Liaise with appropriate LA regarding online safety issues
- Take responsibility for liaising with Alamo to ensure appropriate sites are blocked and share this info with parents, SLT and trustees
- Ensure Alamo has passed UKCIS checklist
- Take responsibility for ensuring staff are removed from platforms and their log in details are deactivated when they leave
- Ensure that all alerts are shared with key staff in each setting
- Ensure the trust is signed up to South West Grid for Learning (Professional Online Safety Helpline) to monitor what has been posted online about the trust and remove this where necessary

Supporting pupils in the digital age

It is important that school, alongside parents and carers, are being pro- active in guiding the children through the digital world.
See appendix 14 for some key strategies to help support pupils to mitigate these risks.

Other areas of work

All trust and academy policies that address issues of power and potential harm, e.g., anti-bullying, equal opportunities, positive handling, behaviour and relational, will be linked to ensure a whole school approach.

Our safeguarding and child protection policy cannot be separated from the general ethos of the trust which ensures that children are treated with respect and dignity, feel safe, and are listened to.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and can occur between pupils outside the school or college. All staff, but especially the DSL/DDSL, will consider the context within which such incidents and behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and welfare.

8. Our role in supporting children

We will offer appropriate support to individual children who have experienced abuse or who have abused others.

- In cases where pupils have experienced abuse/abused others, the DSL will ensure that appropriate support is offered. An individual risk assessment will be devised, implemented, and reviewed

regularly should the pupil (victim, perpetrator, or other child affected) require additional pastoral support/intervention.

- Our staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, cultural expectations and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. This trust will determine how best to build trusted relationships with children and young people which facilitate communication.

- For children who have been found to be in possession of a knife or bladed implement whilst on an education setting/grounds, or has have used a weapon, or has have threatened the use of a weapon information will be passed to the designated safeguarding lead as soon as possible and the appropriate referrals and risk assessments will be actioned. Any weapons or items which are evidence of a suspected offence will be passed to the police as soon as possible.

In cases where pupils have experienced abuse/abused others, the designated safeguarding lead should ensure that appropriate support is offered. An individual risk assessment will be devised, implemented, and reviewed regularly should the pupil (victim, perpetrator, or other child affected) require additional pastoral support/intervention.

Early Support

If we identify additional unmet needs for a pupil that does not require intervention by social workers, then in the first instance it may be beneficial to speak to the **casework consultant linked to the relevant local authority early help and community hub**. They can advise whether family support may be required, this may help us to understand what support we can offer if we complete an early support assessment (ESA). The early support assessment should be a tool in its own right and not a referral mechanism.

For pupils whose needs and circumstances make them more vulnerable, a coordinated multi-disciplinary approach is usually best, based on an **early support assessment**, with a lead practitioner to work closely with the child and family to ensure they receive the right support.

When we complete an Early Support Assessment:

- The information required to evidence that more targeted or statutory services are needed will be better informed by a good quality assessment having been carried out;

- If it is not clear who is best placed to provide the support, an early support assessment (ESA) will be requested before accepting a referral;

- If additional support is required from the early support service, then a referral will be accepted without an ESA to prevent delay in offering support (Appendix 9);

- Monitoring of referrals made without assessments will be routinely reported to the local authority safeguarding body to promote improvement in assessment practice within all partner agencies;

- If the referral is relating to a family where there is an existing multi-agency support, an ESA should have already been completed and should be included with the referral

Children in Specific Circumstances

We recognise that all children can be at risk of abuse however we acknowledge that some groups are more vulnerable, this can include:

- the experience of abuse within their family.
- young people in care.
- children who go missing.
- children with additional needs (SEN and/or disabilities) .
- children who identify as LGBTQ+ and/or have other protected characteristics under the Equalities Act 2010.
- children living with domestic abuse or drug/alcohol abusing parents.
- This trust recognises that while all pupils have a right to be safe, some pupils *may* be more vulnerable to abuse e.g. those with a disability or special educational need, those living with domestic abuse or drug/alcohol abusing parents, etc.
- This trust follows the relevant local authority online multi-agency procedures and will, where necessary, have due regard to the government guidance for children in specific circumstances as outlined in Part 1 and Annex A of KCSiE 2025.

Female Genital Mutilation (FGM) the Mandatory Reporting Duty

- The Department for Education's Keeping Children Safe in Education 2021 explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia or other injuries 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'.
- **Any staff member** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** will immediately (in consultation with the designated safeguarding lead) report this to the police, personally. This is a statutory duty, and staff will face disciplinary sanctions for failing to meet it.
- The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff will not examine pupils.
- **Any member of staff** who suspects a pupil is *at risk* of FGM will speak to the DSL and follow our local safeguarding children's partnership procedures.

Honour- based abuse (including forced marriage)

Our trust recognises that honour-based abuse (HBA) encompasses incidents of crimes that have been committed to protect or defend the honour of the family and/or the community. Abuse committed in this context often involves a wider network of family or community pressure and can involve multiple perpetrators. If staff in our academies have a concern regarding a pupil that might be at risk of HBA or who has suffered from HBA they will immediately speak to the designated safeguarding lead who will follow the academies' safeguarding procedures. For every crime committed there are also numerous incidents of bullying, emotional and psychological abuse. Some victims have very restricted movements and are under constant supervision having little contact with the outside world.

Crimes committed may include:

- false imprisonment or kidnap
- domestic servitude
- ABH or GBH
- threats to kill
- harassment and stalking
- sexual assault
- rape
- female genital mutilation
- forced to commit suicide
- forced marriage
- murder
- modern slavery
- child trafficking

Further information and resources can be found in Appendix 10.

Preventing Radicalisation

Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups. .

Responding to concerns about radicalisation

- If staff are concerned about a change in the behaviour of an individual or see something that concerns them **(this could be a colleague too)** they will seek advice appropriately with the designated safeguarding lead who will contact the Prevent hub–01924 306645 or 01924 306776 (Wakefield) or 01924 483747 (Kirklees) or 01709 336080 (Rotherham) or 07788264621 (Bradford)

or prevent@calderdale.gov.uk (Calderdale) or prevent@leeds.gov.uk 0113 535 0810 (Leeds) for further advice (Appendix 5).

- Should there be a concern about the behaviour of a staff member with relation to Prevent then this should be reported to the DSL or Head Teacher/Head of school and a referral made to the LA Prevent co-ordinator

- We will assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting pupils in the area and a specific understanding of how to identify individual pupils who may be at risk of radicalisation and what to do to support them. The Prevent hubs will advise us and identify local referral pathways.

- Effective early support relies on all our staff to be vigilant and aware of the nature of the risk for pupils and what support may be available. Our academies will ensure that as far as possible all front-line staff will undertake Prevent awareness training (e.g. workshop to raise awareness of Prevent [WRAP]).

- For more information about Prevent, see Appendix 5.

Child on child abuse: Sexual violence and sexual harassment between children in the Trust

We recognise that pupils can abuse their peers and that child on child abuse can manifest in many ways, including physical abuse, prejudice-based and discriminatory bullying, on-line bullying, youth produced imagery (sexting), abuse in intimate personal relationships between peers, criminal and sexual exploitation, upskirting, initiation and inappropriate harmful sexualised behaviours, and that it could happen here. It is very clear that this abuse should always be treated seriously, and never just as banter, having a laugh or part of growing up. The trust has a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated in our schools and will be challenged. The trust recognises that even if there are no reports in our settings it does not mean it is not happening, therefore the trust will promote an ongoing culture of vigilance to create a safe environment for children. **Any concerns around child on child abuse must be reported and recorded in line with the child protection procedures outlined in this policy and reported to the designated safeguarding lead or deputy as soon as possible.** It should be noted that upskirting became a criminal offence in April 2019 and any such incidents, in line with this policy should be treated as such. Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. The designated safeguarding lead is responsible for responding to such concerns in keeping with local authority protocols. The designated safeguarding lead is responsible for providing support to any victims, and the perpetrators.

- Where pupils have exhibited inappropriate/harmful sexualised behaviour and/ exhibited inappropriate harmful sexualised behaviours towards others, **the WMBC Harmful Sexual Response Checklist and The Hackett Harmful Sexual Behaviour Framework** will be used, and contact made with social care direct, police, or early support if appropriate (Appendix 4). The trust might choose to manage the incident or concern internally if appropriate depending on the nature and the child/children involved through the behaviour and relational policy and pastoral support. In all cases the decisions (and reasons for decisions) will be recorded.

- The trust will ensure that **all** victims are reassured that they will be taken seriously regardless of how long it has taken them to come forward and that they will be supported and kept safe. All staff will be trained to manage reports of harmful sexual behaviour.

In the event of a disclosure or report school will:

- Listen carefully, reflecting back using the pupil's language;
- Reassure the pupil that this will be taken seriously;
- Ask open-ended questions;
- Not promise confidentiality;
- Inform the DSL or DDSL as soon as practically possible if either the DSL or DDSL is not involved in the initial report;
- A written record of the facts will be made;
- School will consider whether electronic devices will need to be confiscated at this point;
- The school will consider the wishes of the victim and how they would like to proceed, giving the victim as much control as possible in line with school safeguarding arrangements.

The trust will ensure that the needs of pupils who abuse others will be considered separately from the needs of their victims and give immediate consideration as to how best to support and protect the alleged victim and the alleged perpetrator(s). A co-ordinated multi-agency approach will take place through a risk assessment management plan (RAMP) to respond to their needs which will include parent/carers, youth justice, police (where appropriate), children's social work service, and health which will be kept under review.

Further information and guidance can be found in our school's child-on-child abuse policy which all school staff are expected to follow.

Additional guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf

Mental Health

We will ensure that we have clear systems and processes in place for identifying children in need of extra mental health support, this will include working with external agencies. All staff should be aware that mental health problems can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence, and adulthood. This trust is aware of how these children's experiences, can impact their mental health, behaviour, and education.

If staff have mental health concerns about a pupil that is also a safeguarding concern immediate action will be taken, following the child protection procedure, and speaking to the DSL or DDSL.

Additional guidance: Mental health and behaviour in schools - GOV.UK

Child Sexual Exploitation (CSE) and Child Criminal Exploitation: (CCE):

Both child sexual exploitation and criminal exploitation are forms of abuse. They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantages (such as increased status) of the perpetrator or facilitator in exchange for something the victim needs or wants and/or will be for the financial advantage or increased status of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups of males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
It can involve force and/or enticement-based methods of compliance and may or may not be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Reference: Child Sexual Exploitation. *Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation*

(https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners)

Where child sexual exploitation, or the risk of it, is suspected, frontline practitioners should pass the information onto the designated member of staff for child protection (DSL).

The designated safeguarding lead will complete the CSE/CCE checklist tool for partners, (Appendix 3) and refer to the table at the end of the tool to help decide how to proceed. A copy of the completed tool will be kept in the pupil's child protection records for future reference.

If the pupil already has an allocated social worker, the DSL will contact them (or their team manager) to discuss any concerns about sexual exploitation.

Trust staff will work in partnership with parents/carers and other agencies as appropriate. This includes facilitating return to home interviews as requested.

Indicators to look out for are:

- Appear with unexplained gifts, money, or new possessions;
- Associate with other children involved in exploitation;
- Suffer from changes in emotional well-being;
- Misuse of drugs and alcohol;
- Go missing for periods of time or regularly come home late;
- Regularly miss school or education or do not take part in education.

Specific indicators that may be present in CSE are children who:

- Have older boyfriends/girlfriends;
- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Young people who are victims of CCE include those who are:

- Trafficked within the UK with the intention of being used to commit criminal acts that benefit the trade of drugs and criminal gangs;
- Coerced into the supply, transporting, and dealing of class A drugs. They may be doing this within their local area, however, they are often crossing one or more police force or local authority boundaries;
- Coerced into carrying drugs, weapons, and money to assist in the trade and movement of drugs.

CCE often occurs without the pupil's immediate recognition, and with the pupil believing that they are in control of the situation. In all cases, those exploiting the pupil have power over them by virtue of their age, gender, intellect, physical strength. Violence, coercion, and intimidation are common, involvement of exploitive relationships being characterised in the main by the pupil's availability of choice resulting from their social/economic and/or emotional vulnerability. The experience of girls who are criminally exploited can be very different from that of boys. The indicators may not be the same, however, we are aware that girls are at risk of criminal exploitation too. We also recognise that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Serious Violence

- Staff recognise when pupils may be at risk from/or involved with a serious violent crime by recognising the indicators such as:
    1. Increased absence from school;
    2. A change in friendship or relationships with older individuals or groups;
    3. A decline in performance;
    4. Signs of self-harm or a significant change in wellbeing;
    5. Signs of assault or unexplained injuries;
    6. Unexplained gifts or new possessions.
- The trust recognises the risk factors which increase the likelihood of involvement in serious violence such as:
    1. Being male;
    2. Having been frequently absent or permanently excluded from school;
    3. Having experienced child maltreatment;
    4. Having been involved in offending, such as theft or robbery.

County lines: criminal exploitation of children and vulnerable

Preventing youth violence and gang involvement - GOV.UK

Private Fostering

- Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer for 28 days or more. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles, or aunts (whether of full blood, half-blood, or by marriage). Great grandparents, great aunts, great uncles, and cousins are not regarded as close relatives.

- The law requires us to notify social care direct if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the pupil and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration, or emotional issues such as keeping contact with biological family, maintaining cultural identity.

- If we become aware of a child in a private fostering arrangement within the local authority, we will notify the relevant child safeguarding service. See Appendix 10.

Children looked after and previously looked after Children and children with a social worker

- All our staff recognise that children looked after and previously looked after children (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and care leavers and children with a social worker are more vulnerable than other children, often having poorer educational outcomes; therefore, ensuring their wellbeing, safety and welfare, helping them to reach their potential which includes the looked after child who is moving on is essential. Our academies will also ensure that care leavers are supported with pathways including liaison with the local authority where a personal advisor will be appointed and a full working relationship is maintained with the local authorities Virtual School Head Teacher/Head of school in respect of all pupils at the school who are subject of ‘looked after’ status or have a social worker. See Appendix 10 for contact details.

- Governing bodies of maintained schools and proprietors of academies must appoint a designated teacher and should work with local authorities to promote the educational achievements of registered pupils who are looked after. Designated teachers have responsibility for promoting the educational achievements of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside of England and Wales. (Children and Social work Act 2017). The designated teacher will have appropriate training and the relevant qualifications, and experience.

Children potentially at greater risk of harm

Our trust recognises that while all pupils have a right to be safe and well, some groups of pupils are potentially at greater risk of harm and more vulnerable to abuse e.g those with a disability or special educational needs, those living with domestic abuse or drug/alcohol abusing parents.

Children who are lesbian, gay, bi, or trans (LGBTQ+)

- The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm. However, pupils who are LGBTQ+ can be targeted by other pupils. In this trust, we, therefore, endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff or a trusted adult.

Children who need a social worker (child in need and child protection plans)

Pupils may need a social worker due to safeguarding or welfare needs; we recognise that pupils may need help due to absence, neglect, and complex family circumstances. This trust will work in partnership with the local authority where pupils have been allocated a social worker. The DSL will hold this information so that decisions can be made in the best interests of the pupil's safety, welfare, and educational outcomes. Where we have pupils on roll who need a social worker, this will inform decisions about safeguarding (responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (we will consider the provision of pastoral support and/or academic support, alongside action by statutory services**).**

Children with special educational needs, disabilities, or physical health issues

The trust recognises that children with (SEN) and disabilities can face additional safeguarding challenges these can include:

- Assumptions that indicators of possible abuse such as behaviour, mood, and injury related to the child's disability without further exploration;
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges.

To address these additional challenges, we will consider extra pastoral support for children with SEND.

Non- recent abuse

Non recent child abuse, sometimes called historical abuse, is when an adult was abused as a child or young person under the age of 18.

8. Responding to Domestic Abuse

The trust understands that the cross-government definition of domestic abuse and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

- The abuse can encompass but is not limited to psychological, physical, sexual, financial, emotional harm;
- Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal

gain, depriving them of the means needed for independence, resistance, and escape, and regulating their everyday behaviour;

- Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation, and intimidation, or other abuse that is used to harm, punish, or frighten their victim if this school does identify children for whom domestic abuse may be a concern, they will apply the usual referral process and child protection procedures and pass this information to the designated safeguarding lead (DSL). The DSL can then refer cases to relevant local authority teams. Where DA notifications are received they will be added to a pupil's chronology and child protection record to ensure that appropriate support can be provided where necessary;

9. For contact details, please see Appendix 10.

10. **Attendance and Children Missing Education:Children Missing Education (CME) refers to children of compulsory school age (those aged 5 or over) who are not on a school roll and who are not receiving a suitable education otherwise (example privately, electively home educated(EHE) or in alternative provision.) CME is different from home or care or non attendance at school.**

    - Definition of a missing child- anyone under 18 whose whereabouts are unknown, and their well- being or otherwise cannot be confirmed until they are located
    - Definition of missing from care- refers to a child in care who is not at their placement or the place they are expected to be (e.g.,school) and whose whereabouts are unknown
    - Definition of being away from a placement without authorisation- means a child looked after's whereabouts are known, but they are not at their placement or where they are expected to be, and this absence is not permitted or authorised by the relevant authorities
    - Definition of a young runaway- refers to an individual who is less than 18 years of age who absents themselves from home or a place of legal residence without the permission of a parent or legal guardian
    - Definition of a police response- emergency response refers to the immediate, systematic actions taken to address unexpected, dangerous, or hazardous situations that cause a risk to health, life, property, or the environment, requiring urgent intervention
    - Definition of Philomena protocol- this is a police initiative, used across the UK, that encourages carers to record vital information about vulnerable children and young people who are at risk of going missing, to help locate and safely return them quickly

- The trust understands that poor attendance can be an indicator of concern for pupils with welfare and safeguarding concerns, and thus ensures that information is shared between pupil, attendance lead and the DSL. Likewise, this trust understands that a parent/carer failing to inform the school that a pupil has an authorised absence could be a cause for concern and thus, we will follow our local authorities' guidance 'First Day Calling' procedures.

- Pupils who are absent, abscond or go missing during the school day are vulnerable and at potential risk of abuse or neglect. Our staff members will follow the local authorities' guidance for schools where pupils abscond during the school day. The trust procedures are available for dealing with pupils who are absent/ go missing, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in future (Appendix 6);

- Where a schools places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs

- If we have further concerns about a pupil's truancy, we will follow the West/South Yorkshire Police Truancy Policy;

  The trust appreciates that each local authority has a statutory duty to ensure that all pupils of compulsory school age receive a suitable and appropriate education. We will comply with our statutory duty to inform the local authority of any pupil who falls within the reporting notification requirements outlined in Children missing education: statutory guidance for local authorities and schools - GOV.UK 2025 There are specific duties in respect of CME and there are strict guidelines in respect of both the definition of CME and the legalities of deleting a pupil from a school roll.

  See Appendix 10 for contact details for children missing in education.

Children missing education: statutory guidance for local authorities and schools - GOV.UKThe trust is aware that they must inform the local authority school exclusion team when using phased reintegration plans for pupils and follow the reduced timetable guidance.

- When we are considering suspending or excluding a vulnerable pupil or a pupil who is either subject to a S47 child protection plan, or there have previously been child protection concerns, we will undertake an informed (multi-agency where other professionals are involved) assessment prior to making the decision to suspend or exclude. In the event of a one-off serious incident resulting in an immediate decision to permanently exclude, the assessment must be completed before convening a meeting with the trustees.

Permanent Exclusions Guidance (September 2020) - Ethos Academy Trust (eat.uk.com)

Elective home education is often referred to as 'education otherwise' in Section 7 of the Education Act 1996 which states: “It shall be the duty of the parent of every child of compulsory school age to cause her or him to receive efficient full-time education suitable to her/his age, aptitude and ability (and to any special educational needs she/he may have) either by attendance at school or otherwise”. This means that parents/carers have a legal responsibility to ensure that their child is educated but this does not have to be in school. This trust will follow the DfE guidance should a parent/carer decide to educate their children/child at home.

https://www.gov.uk/government/publications/elective-home-education

- Child Employment - Properly structured and regulated work can help develop and prepare young people for a full-time working life. A pupil working part-time between the age of 13 and 16 years old, must request that the employer applies to the local authority for a permit. There is no charge for a work permit. Employers have the ultimate responsibility to ensure that pupils of compulsory school age are registered with the local authority and have a work permit. Parents/carers can also face prosecution if they allow their child to work illegally. Please note that it is against the law to employ children under the age of 13. As a trust we will work in partnership with the local authority’s Education Welfare Service in relation to child employment.

- See Appendix 10 for contact details.

11. A Safer Culture

Trustees have agreed and ratified the following policies which must be read in conjunction with this policy and be provided to all staff as part of their induction procedures:

- Whistle blowing/confidential reporting policies (guidance to staff and volunteers on how they can raise concerns and receive appropriate feedback on action taken when staff have concerns about any adult's behaviour);
- Procedures for managing children who are missing education;
- Safeguarding and child protection policy (including online safety);
- Individual provision behaviour and relationships policypolicy;
- Safer working practices policy.

Low Level Concerns About Staff

A low-level concern is a behaviour towards a child by a member of staff that does not meet the harms threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. For example, this may include:

- Being over-friendly with pupils
- Having favourites;
- Taking photographs of pupils on a personal device;
- Engaging in one-to-one activities where they can't easily be seen;
- Using inappropriate language;
- Low-level concerns can include inappropriate conduct inside and outside of work.

Where there are concerns about a member of staff, trust employees will report concerns to the Head Teacher/Head of school. Any concerns about the Head Teacher/Head of school will be reported to the chair of trustees. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

All reports will be handled in a responsive, sensitive and proportionate way.
Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust, and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse. Reporting and responding to low-level concerns is covered in this section and Appendix 11.

Please also see Appendix 13 linked to Low Level Concerns.

Our trust will comply with the guidance for safer working practices for those working with children and young people in educations settings May 2019

Safe working practice ensures that pupils are safe and that all staff:

- Are responsible for their actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;

- Work in an open and transparent way;

- Work with other colleagues where possible in situations open to question;

- Discuss and/or take advice from the senior leadership team over any incident which may give rise to concern;

- Record any incidents or decisions made;

- Apply the same professional standards regardless of gender, sexuality, or disability;

- Comply and are aware of the confidentiality policy;

- Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

Risk Assessments

- Risk assessments are taken seriously and used to good effect to promote safety. Risk assessments are available for all aspects of the trust's work. Where relevant, risk assessments are carried out for individual pupils and supported by action plans identifying how potential risks would be managed. The Evolve system is used for risk assessing trips outside of each provision.

- Individual risk assessments are also used when deciding a response to a pupil demonstrating potentially harmful behaviour such as sexually harmful behaviour or when identifying whether a pupil who may be particularly vulnerable, such as a pupil at risk of exploitation.

Safer Recruitment

A more detailed version of safer recruitment can be found in the trust safer recruitment policy.

- Section 175 of the Education Act 2002 requires this trust to make arrangements to ensure that functions are carried out with a view to safeguarding and promoting the welfare of children.

- Regulations made under Section 157 of that Act state that we must make arrangements to safeguard and promote the welfare of pupils.

- The trust will create a culture that safeguards and promotes the welfare of pupils in each provision. As part of this culture, we **will** adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with pupils from applying or securing employment or volunteering in this regulated establishment.

- The safer recruitment of individuals to work in each provision not only includes directly employed staff (or volunteers), also includes contractors, self-employed, agency, and third-party staff groups. We will set out our safeguarding and safer recruitment requirements in the contract clearly between the organisation(s) and provision.

- Safer recruitment is a vital factor in keeping children safe within the education environment. Our trust, when selecting our safer recruitment provider, will clarify the accreditation / re accreditation period. We will always ensure a re-accreditation period for safeguarding training.

- We will also follow legislation governing those persons in 'regulated activity' (see below) or within 'regulated establishments' and the requirements to carry out criminal records and barred list checks.

The main legislation in this respect is contained within the:

- Children's Act 2006;
- Safeguarding and Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012 (Protection of Freedoms Act 2012 (legislation.gov.uk));
- Equality Act 2010 (https://www.legislation.gov.uk/ukpga/2010/15/contents);
- Police Act 1997, the Police Act 1997 (Criminal Records) Regulations 2002, as amended, the Police Act 1997 (Criminal Records) No 2 Regulations 2009, as amended: (https://www.legislation.gov.uk/ukpga/1997/50/contents;
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended;
- Sexual Offences Act 2003 (https://www.legislation.gov.uk/ukpga/2003/42/contents);
- Keeping Children Safe in Education 2021;
- Keeping Children Safe in Education 2023
- Working Together to Safeguard Children 2018.

Any subsequent amendments will also apply as relevant.

Requirements relating to the appointment, discipline, capability, suspension and dismissal of staff, use of supply staff/workers, checks and information to be held on the provision single central register (SCR), as well as information on teacher capability to be provided in references are specified within the School Staffing (England) Regulations 2009, as amended in 2012, 2013 and 2014.

Purpose of this trust's safer recruitment policy

- This trust will take into account the legislation highlighted above, when we employ staff or engage volunteers, contractors, self-employed, agency and third-party staff groups to work with pupils adopt a consistent and rigorous approach in their recruitment and selection processes with the aim of ensuring that those recruited are suitable.

The purpose of safer recruitment is ultimately to:

- **Deter** This trust has a rigorous recruitment process and does not tolerate any form of abuse. Wording in adverts and recruitment information will aim to deter potential abusers.

- **Identify and reject** It will not always be possible to deter potential abusers. Therefore, careful planning for the interview and selection stage, in terms of asking the right questions, setting appropriate tasks and obtaining the right information will assist in finding out who is suitable for the role and who is not.

- **Prevent and reject** There are no guarantees that even the most robust safer recruitment process will prevent an inappropriate appointment. However, this does not mean it is too late to act. Ensuring that comprehensive induction processes are in place, together with appropriate policies and procedures, raising awareness through staff training and developing and maintaining a safe culture within the trust will all help to prevent abuse or identify potential abusers.

The intention of our safer recruitment policy is to ensure that all stages of the recruitment process contain measures to deter, identify, prevent, and reject unsuitable people from gaining access to pupils within the trust.
Our trust policy and the practical implementation of recruitment and selection processes also aim to meet all legislative requirements, any statutory or other guidance that may from time to time be issued in order to keep pupils safe and safer recruitment in education, as well as principles of general good practice

Letters of Assurance

- An appropriate 'letter of assurance' will be on headed paper, personally addressed, dated, signed and provided by the relevant authorised person on behalf of the individual concerned, for example by the agency on behalf of an agency worker.

- Further details are available in the trust visitor/contractor policy.

Table 1

The following information is requested and confirmed in writing by the following parties; • Agency worker (all staff groups); • Contractors; • Third Party Organisations (e.g. Council/ NHS/ WDH etc)
• Written confirmation all Pre employment checks (role dependent) have been satisfactorily carried out
• At least one recruiter on the recruitment panel to be Safer Recruitment trained (refreshed every 3 years)
• Applications forms with complete employment history
• 2 x verified references inc. question disciplinary, substantiated allegations towards children and capability
• DBS (+Barred list) where appropriate
• Prohibition from Teaching
• S128 checks (role dependent)
• Qualifications (role dependant)
• Right to Work in the UK
• Appropriate checks for overseas employees
• Disclosure under Childcare Disqualification Regulations 2018 and Childcare Act 2006
• References (Safer Recruitment)
• Medical clearance
• Any disclosed information/Risk assessments shared with the provision
• Safeguarding awareness training

Managing Allegations

Local Authority Designated Officer (LADO)

The LADO must be informed within 1 working day (or the next working day) when an allegation is made; prior to any further investigation taking place (Appendix 7). Improved outcomes for pupils are aided by close collaboration between single and multi-agency partners, through timely quality conversations. A more detailed version of managing allegations can be found in the allegations of abuse against staff policy.

This trust follows the guidance on managing allegations and low-level concerns in Appendix 7 and 12

We will refer to the LADO when:

It is alleged that a person who works with pupils (paid or unpaid capacity) has:

- Behaved in a way that has or may have harmed a pupil.
- Possibly committed a criminal offence against/related to a pupil.
- Behaved toward a pupil in a way that indicates he or she would pose a risk of harm.

All allegations relating to the harm of a pupil by those who work with them will be taken seriously by this trust.

Reasons for an allegation

An allegation is made against a person in relation to a matter that may indicate that the person may not be suitable to work with children. This can be connected with his/her employment or voluntary activity, or in relation to a person's private life where:

- Concerns arise about a person's behaviour about his/her own children;
- Concerns arise about the behaviour of a partner, member of the family or other household member;
- Other information suggests they may pose a risk to any person that may demonstrate a transferable risk within their role with children.

The LADO will ensure that all allegations and enquires are managed proportionately and appropriately; sharing information to ensure that children are safeguarded within multi agency settings.

Training, knowledge, and skills

- All staff members will be aware of systems within our trust that support safeguarding, and these will be explained to them as part of our staff induction. This includes: the trust's safeguarding and child protection policy; the school's safer working practice document and the trust's whistleblowing procedures.

- DSLs will have a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures, and responsibilities of other agencies, particularly children's social care.

Designated safeguarding leads will attend the following training:

1. Roles & Responsibilities of the designated safeguarding lead;

2. Multi-agency working together to safeguard children and young people;

3. A positive contribution to case conferences and core groups.

- They will also attend DSL refresher training every two years. Additionally, the DSL will undertake Prevent Awareness Training (e.g. Workshop to Raise Awareness of Prevent [WRAP]) to enable them to provide advice and support to other members of staff on protecting pupils from the risk of radicalisation.

- The trust will ensure all staff, including temporary and volunteers, receive induction and training appropriate to their roles and responsibilities, especially staff new to the trust. All staff will complete basic awareness refresher training at least every three years and regular safeguarding and child protection updates via email, e-bulletins, and staff meetings as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively. Staff can access training through the local authority offer and trust CPD (Continuing Professional Development).

- The Head Teacher/Head of school will attend appropriate safeguarding training at least every three years.

- The trustees will complete appropriate safeguarding and child protection (including online) training at induction and update this **annually**

- Trustees, including the nominated link trustee will attend specific training for their role, updated at least every three years.

Providing support to staff

Designated safeguarding leads should:

- Ensure that staff are supported during the referral process;

- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support;

- Encourage a culture of listening to pupils and taking account of their wishes and feelings, among all staff, and in any measures the trust may put in place to protect them;

- Understand the difficulties that pupils may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication;

See Appendix 10 for training information.

Any training accessed through third party/independent providers must reflect local authority safeguarding protocols and this training should be recorded by the trust. It is the responsibility of the Head Teacher/Head of school to quality assure any training that is delivered to staff in each provision.

12. Child Protection Records

Child protection and safeguarding records will be held securely, with access being restricted to the DSL/DDSL, Head Teacher/Head of school and in cases of early support, the nominated lead professional, if this is not a DSL. For further information please see section 6.

The following information must be kept securely with restricted access, whether paper or electronic:

- Chronology (summary of significant events and the actions and involvement of the provision);
- All completed child protection cause for concern records;
- Any child protection information received from the child's previous educational establishment;
- Records of discussions, telephone calls and meetings with colleagues and other agencies or services;
- Professional consultations;
- Letters and emails sent and received relating to child protection matters;
- Referral forms sent to social care direct, other external agencies or education-based services;
- Minutes or notes of meetings, e.g. child protection conferences, core group meetings, etc., copied to the file of each child in the family, as appropriate;
- Formal plans for, or linked to, the child e.g. child protection plans, early support risk assessments etc;
- A copy of any support plan for the pupil concerned;
- When a pupil leaves the trust's provision, we will ensure that the child protection file is transferred securely and separately from the main pupil file to the receiving school/educational establishment (where this is known) as soon as possible, and within 5 days for an in year transfer or within the first 5 days of the start of a new term;
- When there is an existing risk management plan/assessment in place for behaviours that are deemed potentially harmful to the pupil or others (i.e. self-harming or harmful sexualised behaviour), this information will be shared with the destination provision prior to the pupil starting so that appropriate care and control measures can be put in place to mitigate the potential of any risk of further harm occurring. The designated safeguarding lead will consider if it would be appropriate to share any information with the new school or college in advance of a child leaving, for example prior to a transfer programme. When a pupil leaves school before statutory school leaving age, the child protection file will be transferred to the new school or college. There is no need for this trust to keep written or electronic copies of the child protection records, therefore these will be deleted from electronic systems once the successful transfer has been confirmed. The exception to this rule will be in any of the following instances:

- When a vulnerable pupil is moving to a further education (FE) establishment, consideration will be given to the pupil's wishes and feelings about their child protection information being passed on, in order that the FE establishment can provide appropriate support. In cases when it is deemed appropriate, relevant child protection information will be shared with the next provision. The original records will be retained and archived by the trust. Due consideration will be given to the sharing of any additional information requested by the receiving establishment;

- When the destination school is not known *(the original records should be retained by the trust);*

- When the child has not attended the nominated school *(the original records should be retained by the Trust);*

- There is any on-going legal action *(the original file should be retained by the provision and a copy sent);*

- Pupil records will be transferred in a secure manner, through secure electronic file transfer. When sending records through secure electronic file transfer, a delivery and read receipt of the transfer will be retained for audit purposes;

- If a pupil moves from our trust, child protection records will be forwarded onto the named designated safeguarding lead at the new school, with due regard to their confidential nature. Good practice suggests that this should always be done with a face to face handover between designated staff or a verbal conversation takes place over the telephone if a face to face handover is not possible. A read receipt must be obtained for audit purposes by the delivering provision;

- For audit purposes a note of all pupil records transferred or received will be kept in electronic format. This will include the pupil's name, date of birth, where and to whom the records have been sent, and the date sent and/or received. A copy of the child protection chronology will also be retained for audit purposes and kept securely;

- If a pupil is permanently excluded and moves to an alternative or specialist provision, child protection records will be forwarded onto the relevant organisation in accordance with the 'The Education (Pupil Information – England) Regulations 2005, following the above procedure for delivery of the records;

- When a DSL resigns their post or no longer has child protection responsibility, there will be a full face to face handover/exchange of information with the new post holder;

- In exceptional circumstances when a face to face handover is unfeasible, it is the responsibility of the Head Teacher/Head of school to ensure that the new post holder is fully conversant with all procedures and case files;

- All DSLs receiving current (live) files or closed files will keep all contents enclosed and not remove any material;

- All receipts confirming file transfer will be kept in accordance with the recommended trust retention periods. For further information refer to the archiving section.

- CPOMs logs will be monitored and appropriate training updates will be provided where necessary to ensure that appropriate language is used when logging incidens/ concerns on CPOMs i.e not victim blaming and avoiding adultification.

Archiving

The school that the pupil attended until statutory school leaving age (or the school where the pupil completed sixth form studies) is responsible for retaining any child protection records they may hold. Child protection records should be retained until the child's 26th birthday, after which point the file will be destroyed confidentially/deleted from our school electronic system. The decision of how and where to store child protection files must be made by our trust via our trust board. Due to the sensitivity of the information, the records should continue to be held in a secure electronic system with limited access e.g. DSL or Head Teacher/Head of school. The DSL is responsible for ensuring that all child protection files are archived in accordance with the timescales referenced above. The DSL is responsible for ensuring that the appropriate timeframes for archiving and destroying child protection records referenced above are reviewed accordingly for each pupil.

Child and parent/carer access to child protection files

Under Data Protection legislation (General Data Protection Regulation & Data Protection Act 2018), a pupil or their nominated representative has several legal rights in respect of information relating to them. These rights include the right to access and the right to rectification of inaccurate data. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

Any pupil who has a child protection file has a right to request access to it. However, neither the pupil nor the parent/carer has an automatic right to see all the information held in child protection records Information can be withheld if disclosure:

- Could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person;
- Could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child;
- Is likely to prejudice an on-going criminal investigation;
- Information about the child also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the LA;

It is best practice to make reports available to the child or their parent/carer unless the exceptions described above apply. If an application is made to see the whole record, advice can be sought from the LA;

The establishment's report to the child protection conference should be shared with the child, if old enough, and parent/carer at least two days before the conference.

Safe destruction of the pupil record

Where records have been identified for destruction, they will be disposed of securely at the end of the academic year (or as soon as practical before that time). Records that have been identified for destruction should be confidentially destroyed. This is because they will either contain personal or sensitive information, which is subject to the requirements of Data Protection legislation or they will contain information that is confidential to our trust or the LA. Information should be shredded (or deleted as appropriate) prior to disposal or confidential disposal can be arranged through private contractors. For audit purposes the trust should maintain a list of records which have been destroyed and who authorised their destruction. This can be kept securely in an electronic format.

Appendix 1 - Definitions and Indicators of Abuse

Reference: Working Together to Safeguard Children (DfE 2018). See also Keeping Children Safe in Education Part one and Annex B

Keeping children safe in education 2025

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Neglect: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result maternal substance abuse. See Appendix 10 for information about toolkit(s) with the aim of supporting anyone working with children, young people, parents, and families to identify, assess and reduce child neglect.

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

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

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

Examples which may indicate neglect (not designed to be used as a checklist)

- Hunger
- Tiredness or listlessness
- Child dirty or unkempt
- Poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention-seeking behaviour
- Untreated illnesses/injuries
- Pallid complexion

- Stealing or scavenging compulsively
- Failure to achieve developmental milestones, for example, growth, weight
- Failure to develop intellectually or socially
- Neurotic behaviour

Physical abuse: 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
Examples which may indicate physical abuse (not designed to be used as a checklist):

- Patterns of bruising; inconsistent account of how bruising or injuries occurred
- Finger, hand, or nail marks, black eyes
- Bite marks
- Round burn marks, burns, and scalds
- Lacerations
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for sports activities
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

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

Examples which may indicate sexual abuse (not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, Persistent complaints of stomach disorders or pains
- Eating disorders, for example Anorexia Nervosa and Bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant
- Regressive behaviour, enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for sports activities or swimming
- Bruises, scratches in genital area

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

Examples which may indicate emotional abuse (not designed to be used as a checklist):

- Over-reaction to mistakes, continual self-deprecation
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics, and twitches
- Self-harming, drug, or solvent abuse
- Fear of parents being contacted
- Running away / going missing
- Compulsive stealing
- Masturbation, appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis

N.B: Some situations where children stop communication suddenly (known as “traumatic mutism”) may indicate maltreatment

Research and experience indicate that the following responses from parents may suggest a cause for concern:

- An unexpected delay in seeking treatment that is obviously needed
- An unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home
- Violence between adults in the household

Children with Special Educational Needs and Disabilities

When working with children with disabilities Trust staff will need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child's finances
- Invasive procedures

Appendix 2 - Dealing with a Disclosure of Abuse

When a child tells me about abuse s/he has suffered, what must I remember?

- Stay calm
- Do not transmit shock, anger, or embarrassment
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you
- Never enter a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people to do this state who this will be and why
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed
- Tell the child that it is not her/his fault
- Encourage the child to talk but do not ask "leading questions" or press for information
- Listen and remember
- Check that you have understood correctly what the child is trying to tell you
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected
- Do not tell the child that what s/he experienced is dirty, naughty, or bad
- It is inappropriate to make any comments about the alleged offender
- Be aware that the child may retract what s/he has told you. It is essential to record all you have heard
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations

NB It is not Trust staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk

Immediately afterwards

All disclosures of abuse will be responded to in keeping with the professional roles and responsibilities outlined in Fig 1 summary of Trust procedure to follow where there are concerns about a child

Appendix 3 - Child Exploitation Partnership Assessment and Decision-Making Tool

What is this tool? - The tool is to help you assess whether a child may be at risk of sexual or criminal exploitation (CSE/CCE)

Who should you use this tool with? - The tool can be used by any professional working with a child up to their 18th birthday

When to use the tool - This tool is to help you make an initial assessment relating to a child's vulnerability to, and/or risk of exploitation, and what actions are required; it is not intended to be a referral form. When you have completed the tool, please refer to the section **'What Next'** to inform a conversation with your manager/safeguarding lead regarding how to proceed. If on completion you contact the Children's Social Care (CSC) Duty and Advice Team, an electronic copy of the completed tool will be required to inform discussion

Using the tool - In order to identify children at risk of, vulnerable to, or experiencing sexual and/or criminal exploitation, please consider **all** of the risk and vulnerability indicators and indicate your level of concern as **No, Low, Medium, or High**. The table of indicators below is only a guide to inform your assessment it is not exhaustive, and you may have other concerns; please highlight these in the other information box. Additionally, the factors against each indictor are also not exhaustive and are simply prompts for consideration. Highlighting one high risk concern, or several low, may indicate a serious risk of harm/child exploitation, alternatively this might be an indication of other concerns which require addressing

You should be aware that:

- Where there are concerns which relate to sexual exploitation and the **child is aged under 13**, a child contact must be made with the Children's Social Care direct
- Where there are concerns of criminal or sexual exploitation and the child has **send** a child contact must be made with the Children's Social Care Direct

- It is important that you provide narrative at the end of the table to support and evidence your concerns
- It is important that you provide information relating to others who may pose a risk of harm to the child/young person
- When completing this tool, it is essential to highlight if concerns raised and/or the information provided are **current or historic**. If either are historic but relevant, it is necessary to reference how they relate to the current assessment of risk and vulnerability
- When completing the tool, it is crucial that the child or young person's use of **social media** is considered throughout

Child, Parent and Professional details

Child's name		**DOB**		**Age**	
Address		**Contact number**		**Gender**	
Postcode		**Religion**		**Ethnicity**	
Child participated in the assessment	**Yes**	**Comments**			
	No				
Name of Primary Carer		**Contact number**			
Address and postcode (If different from the child's)		**Relationship to child**			
Carer contributed to the assessment	**Yes**	**Comments**			
	No				

Person completing the assessment		**Agency/team**	
Contact details		**Signed**	
Consent to share with CSC provided *(where applicable)	**Yes**	**Comments**	
	No		

Assessment of Risk and Vulnerability

1) Friends and Family				2) Accommodation			
v Reduced contact with family /friends which is of concern v New friends who are not known to parents/carers v Unexplained change in attitude from the child v Relationship (s) breakdown v Suspected abuse in family (emotional, neglect, physical or sexual) v A lack of warmth/understanding/attachment and/or trust from parent/carer v Carers do not implement age appropriate boundaries (including use around social media) v Failure to report missing episodes v Abusive/bullying friendships v Friends/family are involved in gang activity/known to the criminal justice system/Neighbourhood Police/ASB teams				v Child or young person and or their family reside in unsuitable/unstable/temporary/overcrowded accommodation v Concerns about location (neighbourhood, ASB, gang activity) v Concerns about isolation/safety v Is unhappy with accommodation (although it meet physical need) v Often stays elsewhere v Is homeless and or sofa surfing v Resides independently in unsupported accommodation v Accommodation is being accessed/used by adults/peers of concern or who pose a risk to the young			
No	**Low**	**Medium**	**High**	**No**	**Low**	**Medium**	**High**
3) Education, Training, Employment (ETE)				**4) Emotional Wellbeing**			
v Is not engaged in ETE, and/or is not motivated to be. v Excluded and/or does not have an education offer v Whereabouts often unknown v Frequently late/leaves early/leaves site, incidents of absence without permission v Change in attitude to learning/employment v Regular breakdown of school/training placements due to perceived behavioural issues v Increasingly disruptive, hostile or physically aggressive v Friendships/peer groups either within or outside the ETE setting are with others at risk of criminal and/or sexual exploitation v Is socially isolated in the ETE setting, and /or experiences bullying, abuse/violence/harassment				v Fatigue v Poor self-image v Low mood v Self-harm - Cutting v Overdosing v Eating disorder v Suicide attempts v Concerning perceived 'risk taking' (substance misuse, sexual risking taking, offending) v Low self-esteem/self-confidence v Bullying/threatening behaviour v Aggression/violent outbursts v Concerning substance misuse v Expressions around invincibility or not caring about what happens to them v Fear and scare of reprisal or violence from young people or adults			
No	**Low**	**Medium**	**High**	**No**	**Low**	**Medium**	**High**

5) Experience of Abuse and Violence				6) Missing From Home or Care			
v Known (previous or current) violence and/or abuse from within the family, and/or from peers, associates, intimate partners v Physical injuries v Disclosure/evidence of physical/sexual assault v Evidence of coercion/control v Living in a gang associated neighbourhood v Use of sexualised language and/or violence v Risk taking behaviours (sexual and /or offending) v Low self-esteem/self-confidence/self-harm v Bullying/threatening behaviour, aggression, violent outbursts v Limited or no recognition of abusive/exploitative behaviour or understanding of abusive/exploitative behaviour but unable to apply this to their own situation				vStays out late or overnight without permission/explanation v Whereabouts unknown and child/young person secretive about where and who they spend time with v Repeated episodes of running away/going missing/away from home/accommodation (Including short periods) v Reported missing with other children/young people assessed to be at risk from criminal/sexual exploitation v Known to spend time when away/missing with peers/adults assessed to be of concern v Returns looking well cared for/not hungry/with new belongings v Found/known to have been outside of their local of area and/or in locations of concern v No known means self-support/travel whilst missing/away v When missing/found, known to be with others involved with group/gang activity/offending behaviour/at risk of exploitation			
No	**Low**	**Medium**	**High**	**No**	**Low**	**Medium**	**High**
7) Associations and Locations				**8) Substance Misuse**			
v Extensive use of phone/secret use/calls and contact with unknown others v Has use of more than one mobile phone v Spends time at addresses and places not know to parent/carer vGoes or is taken to places they or their family have no connections with v Evidence of associations/relationships with others believed/known to be involved in sexual grooming/exploitation v Friendships/associations with others at risk of criminal or sexual exploitation v Gang association through relatives/peers/neighbourhood/intimate relationships v Information suggests that they are at risk of/involved in County Lines (grooming/exploitation, drug dealing, moving money/goods and/or organised crime) v Use of social media/mobile phone to share sexualised images v Has arranged to meet up with unknown others via social media contact v Use of social media/mobile phones for sharing gang related material/activities				v Evidence of regular/heavy or dependant substance (including alcohol) use v Professional/parent/carer concern relating to use v Concern regarding how substance misuse is being accessed/funded/supplied v Is believed to owe money be in debited to others related to substance misuse v Has previously been cautioned/arrested/charged for, possession of drugs, dealing drugs			
No	**Low**	**Medium**	**High**	**No**	**Low**	**Medium**	**High**

9) Coercion and Control				10) Rewards			
v Limited/reduced/no significant contact with family/friends, significant adults and/or services v Appears to be 'controlled'/negatively influenced by others v Concerns about significant relationships and domestic abuse/violence/control v Is known to be associating with adults and/or peers of concern and does want to alter this v Abduction/forced imprisonment v Gang association/involvement v Sharing of intimate pictures/information online when asked to by an adult/peer/unknown person v Secrecy regarding relationships v Presents as being scared/controlled v Picked up/dropped off from appointments by person's unknown v Phone calls they have to respond to and/or leads to them be 'needing' to be elsewhere v Professional concern relating to Modern day slavery/child trafficking				v Concern about unaccounted for monies and/or goods, (new clothes, jewellery mobile phone, mobile phone top –ups etc) v Concern regarding the funding of misuse of drugs/alcohol/use of tobacco, cigarettes, entry into clubs, trips away from home, through unknown sources v Has use of more than one mobile phone v Secrecy about ability to 'get around'/'be places' without known mode of transport /funds v Concerns about how the child/young person funds other items (fast food, taxi fares, etc.)			
No	**Low**	**Medium**	**High**	**No**	**Low**	**Medium**	**High**
11) Sexual Relationships				**12) Risk to Others**			
v Young person is sexually active but not practising safe sex/is not accessing/willing to access, sexual health services v Disclosure from young person regarding feeling pressured to have sex or to perform sexual acts in 'exchange' for status/protection, possessions, substances or affection v Evidence of having (previously or currently) a sexually transmitted disease v Concerns about untreated STi's v Miscarriage(s)/termination(s)/Pregnancy v Physical symptoms suggestive of sexual assault v Is in a sexual relationship with an adult/or there is a wide age gap v Is under 13 and sexually active v Concerns about ability to understand due to intoxication/substance misuse				v Displays violence/bullying and threatening behaviour and/or angry outbursts v Encourages or coerces others to engage in 'risky' activities and/or situations v Introduces others to 'risky' people/places, via friendships, associations, venues v Bullying v Sexualised bullying, including via the internet/social media sites v Offending behaviour v Gang association through relatives, peers or intimate relationships v Has been cautioned/arrested/charged for weapon offence(s)/gang activity/related violence v Sells/distributes/shares drugs v Displays harmful sexual behaviours			
No	**Low**	**Medium**	**High**	**No**	**Low**	**Medium**	**High**

13) Engagement with Services				14) Wider Child and Family Factors			
v Reduced level of engagement or no meaningful engagement v Secretive about friendships/associations/behaviours v Sporadic contact, and/or missed appointments with limited explanation v Professional concern re ability to engage with child/young person v Often otherwise distracted when attends/engages v Presents as nervous and/or keen to be elsewhere				**Family factors** – v Known abuse/neglect in the family. v Parental/family substance misuse v Parental mental health v Partner domestic abuse violence/coercion and control v Child to parent abuse v Adult sex work v Deprivation vSocial isolation v Parental experiences of exploitation **Child factors** - vLearning disabilities/difficulties, (including not diagnosed) v Financially unsupported v Unaccompanied migrant/refugee/asylum seeker v Recent bereavement or loss v Unsure about sexual orientation or unable to disclose sexual orientation v Young carer v Unmet need (social, emotional, physical)			
No	**Low**	**Medium**	**High**	**No**	**Low**	**Medium**	**High**

Additional Information

• **Identified Protective Factors**
• **Other Relevant Information (such as places and people of concern)**

Views of the child or young person	
Views of parent /carer	

Overall level of assessed Risk and Vulnerability

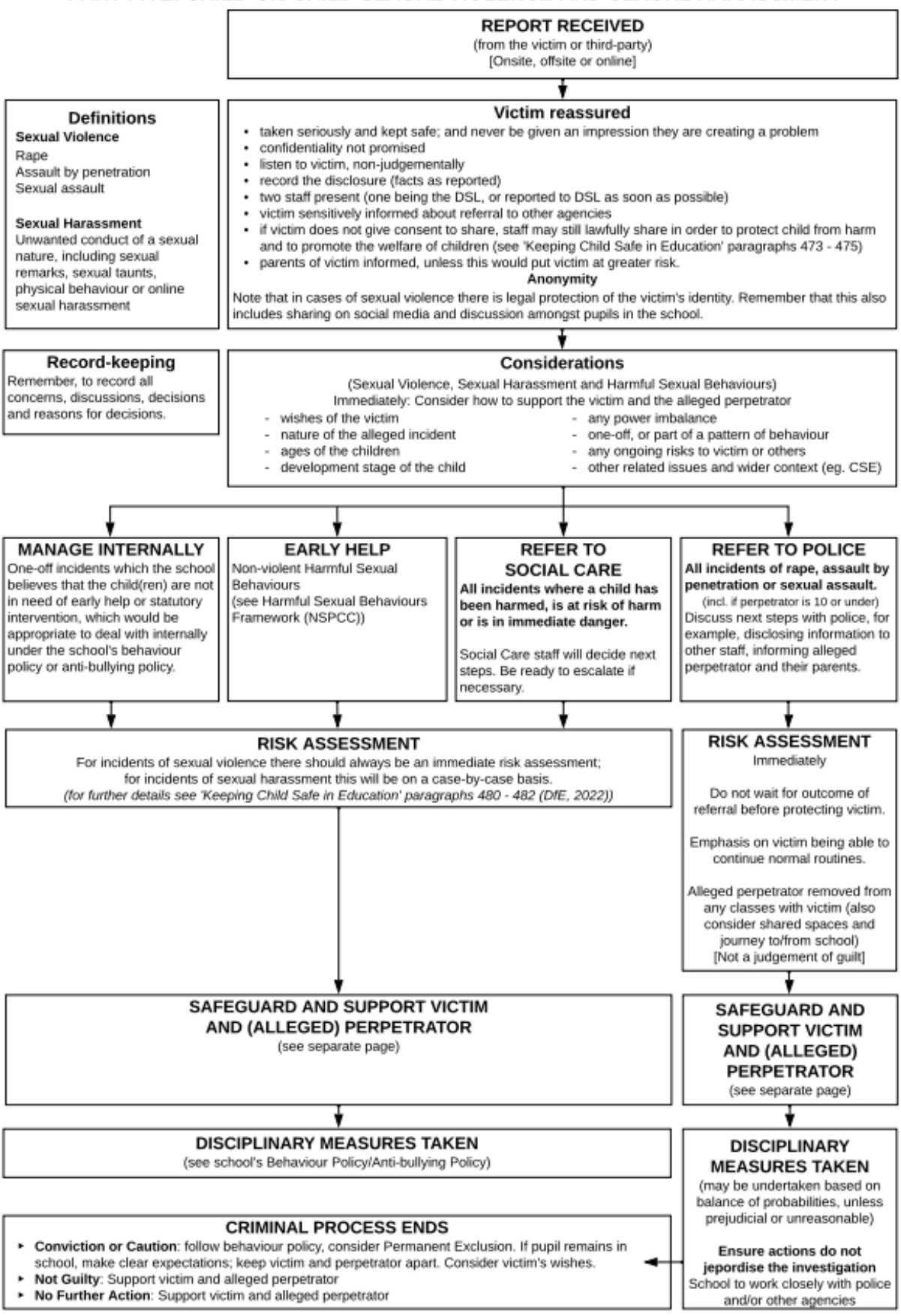
(Please provide details of relevant information to support your indicated levels of concern)

No	Low	Medium	High
Whilst there may be concerns for the welfare of the child which may require service provision, there are no current concerns relating to exploitation	The information and assessment raise some concerns relating to the child's risk and vulnerability, but there are positive protective factors in the child/young person's life	Overall, the information and assessment indicate that the child is vulnerable to/at risk from exploitation. However, there are no immediate or urgent safeguarding concerns	The overall assessment indicates that the child is highly vulnerable to, at risk from exploitation or that they are currently experiencing exploitation. (They may not recognise this)

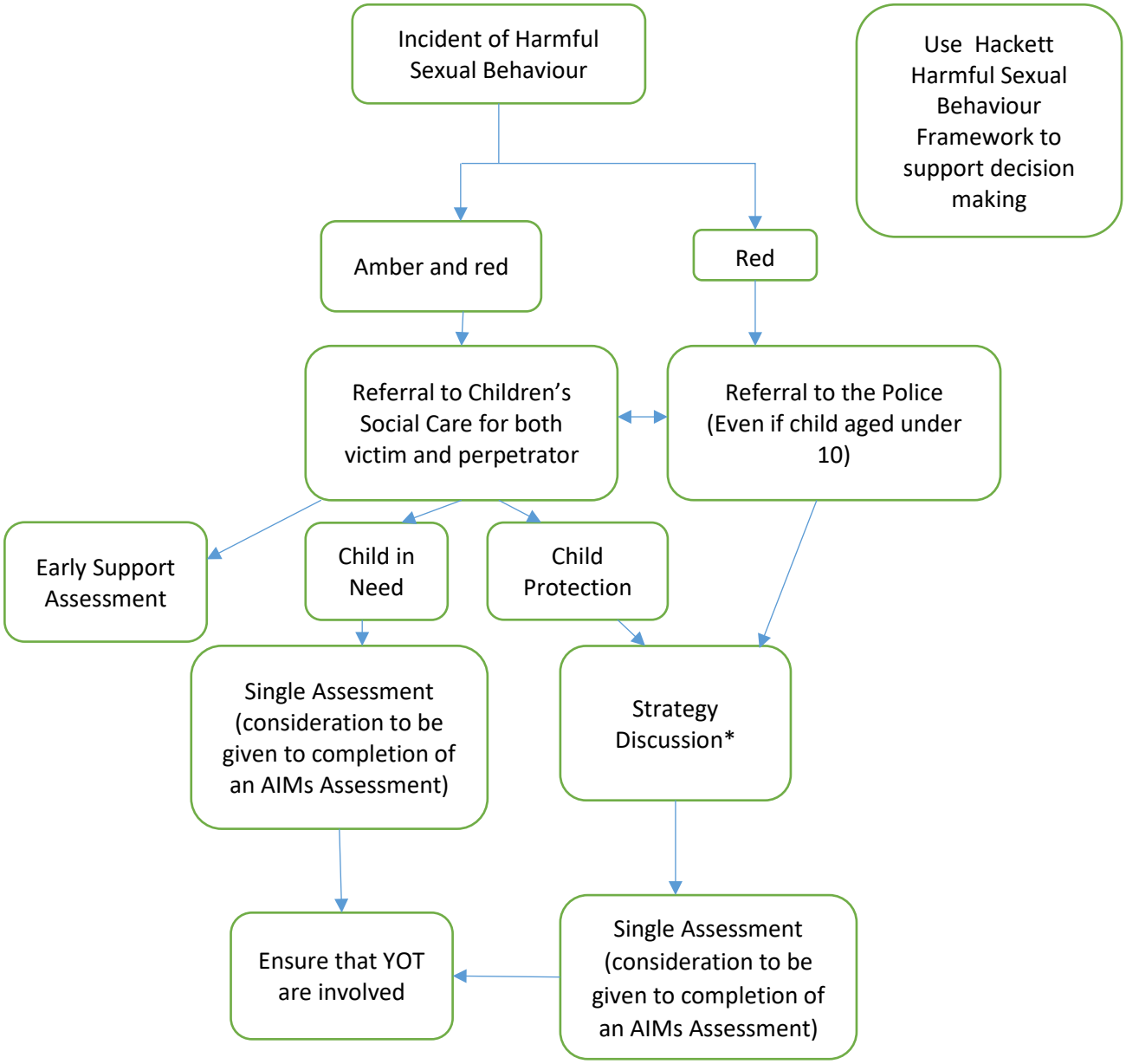
What Next

- Where the assessed level of risk and vulnerability is **Medium or high,** contact Children's Safeguarding Services to discuss and agree next steps
- Keep a copy of this tool in your agency records and use it to inform any identified vulnerability, risk or need, and for planning intervention/support the child and their family may require
- Where the overall assessed level of concern is **Low** and the child does not have an allocated social worker, review your assessment on a regular basis, (at a minimum on a quarterly basis) and if there is an increased level of concern, complete a new tool. Where this leads to an overall assessment of **Medium or High**; contact Children's Social Care Duty and Advice Team to discuss your increased concern
- Where the child/young person already has an allocated social worker, you must contact them to share this tool
- If sharing a completed tool with Children's Social Care, an electronic version of this tool will be required

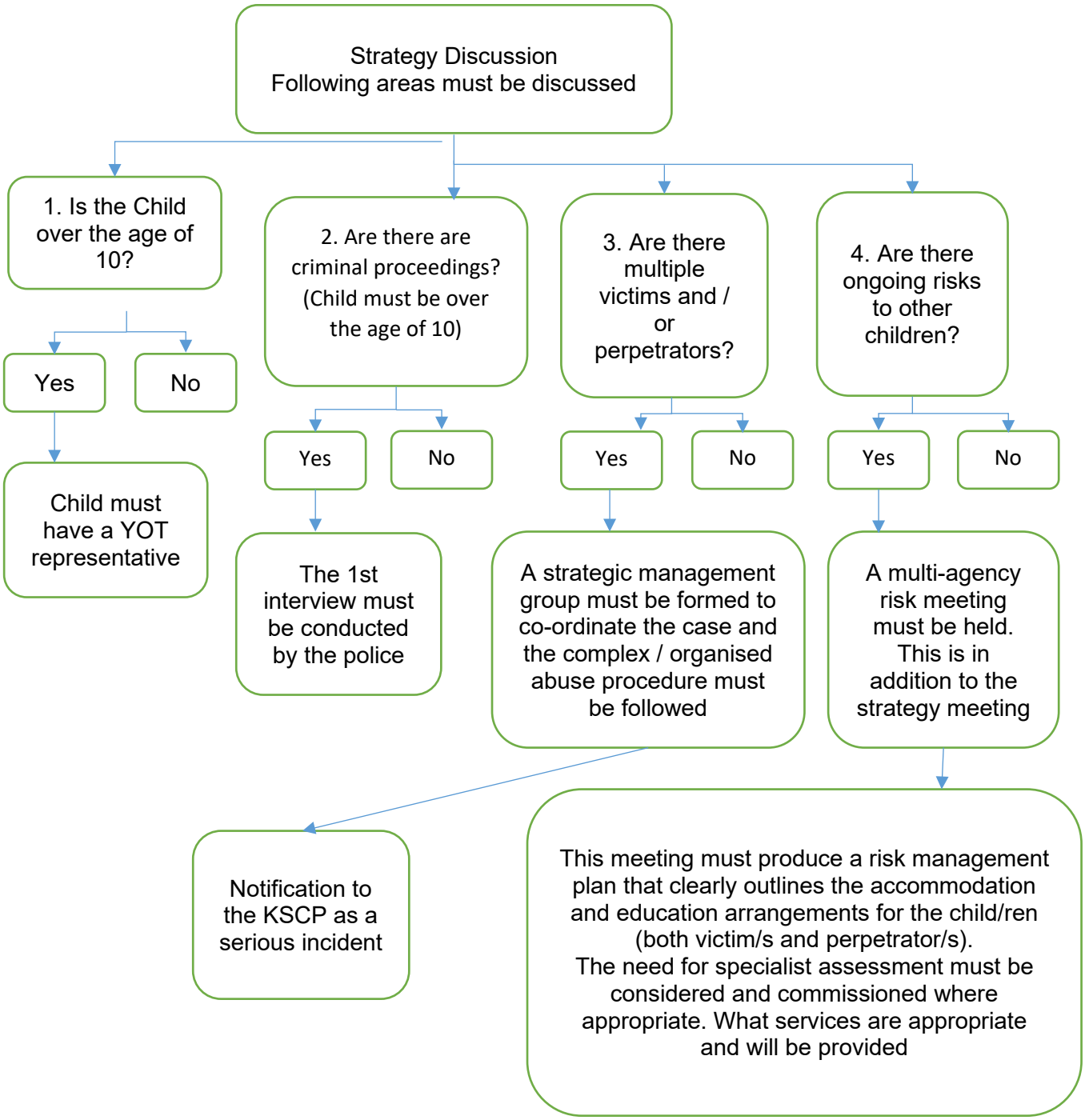
Appendix 4 - Child-on child Sexual Violence and Sexual Harrassment DFE Flow Chart



KSCP Harmful Sexual Behaviour Response Checklist



Kirklees Safeguarding Children Partnership



Kirklees Safeguarding Children Partnership

Assessment guidance

- Need for separate social workers for victim and perpetrator, even if in the same household

All Assessments should include:

- Details of the incident/s (including impact on victim/s, context of abusive behaviours, age of victim/s, nature of relationship between the children / young people involved
- Child and young person's development, family and social circumstances
- Whether the "perpetrator" child / young person acknowledges the alleged behaviour
- Whether there are grounds to suspect that the "perpetrator" child / young person has been abused or there are adults involved in the development of the harmful sexual behaviour
- Details of previous incident/s
- Assessment of child's need and the need for any specialist assessments (including capacity / learning disability)
- Safety of other young people including a Risk management plan for school and one for home
- Accommodation and Education arrangements
- What services need to be provided

brook

SEXUAL BEHAVIOURS
TRAFFIC LIGHT TOOL

Behaviours: age 0 to 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/ skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

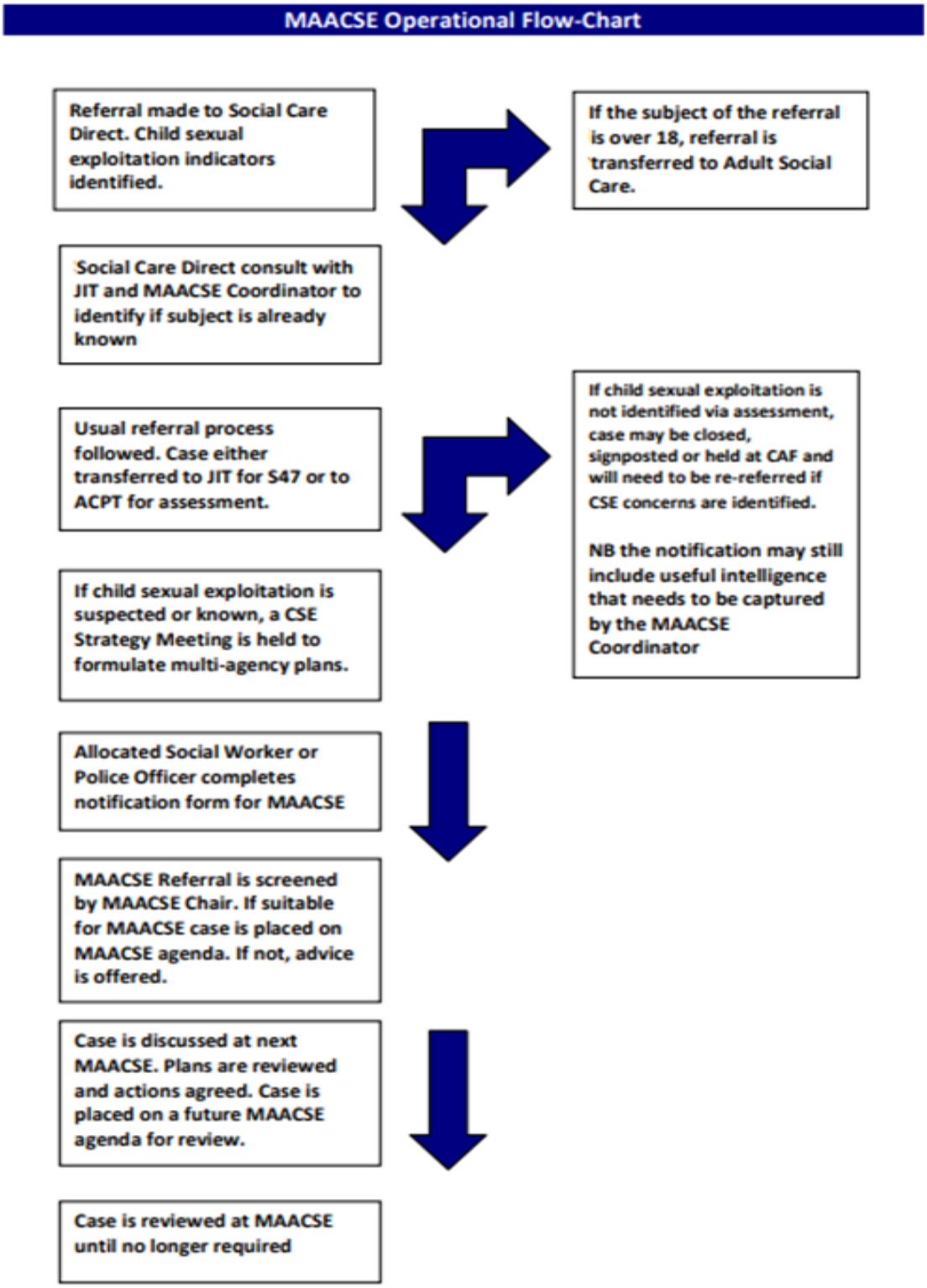
Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

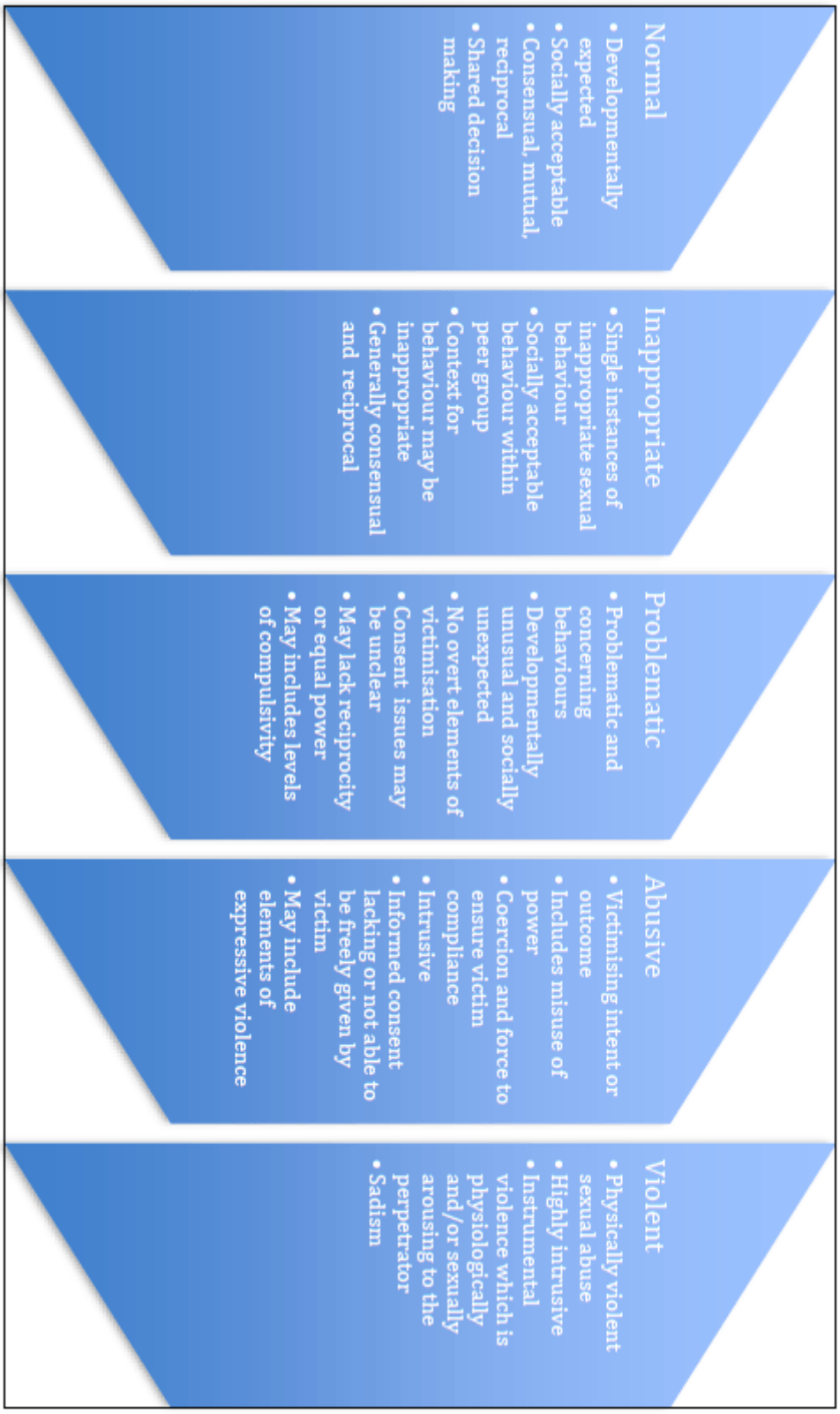
Red behaviours indicate a need for immediate intervention and action.

Kirklees Safeguarding Children Partnership

Wakefield Harmful Sexual Behaviour Response



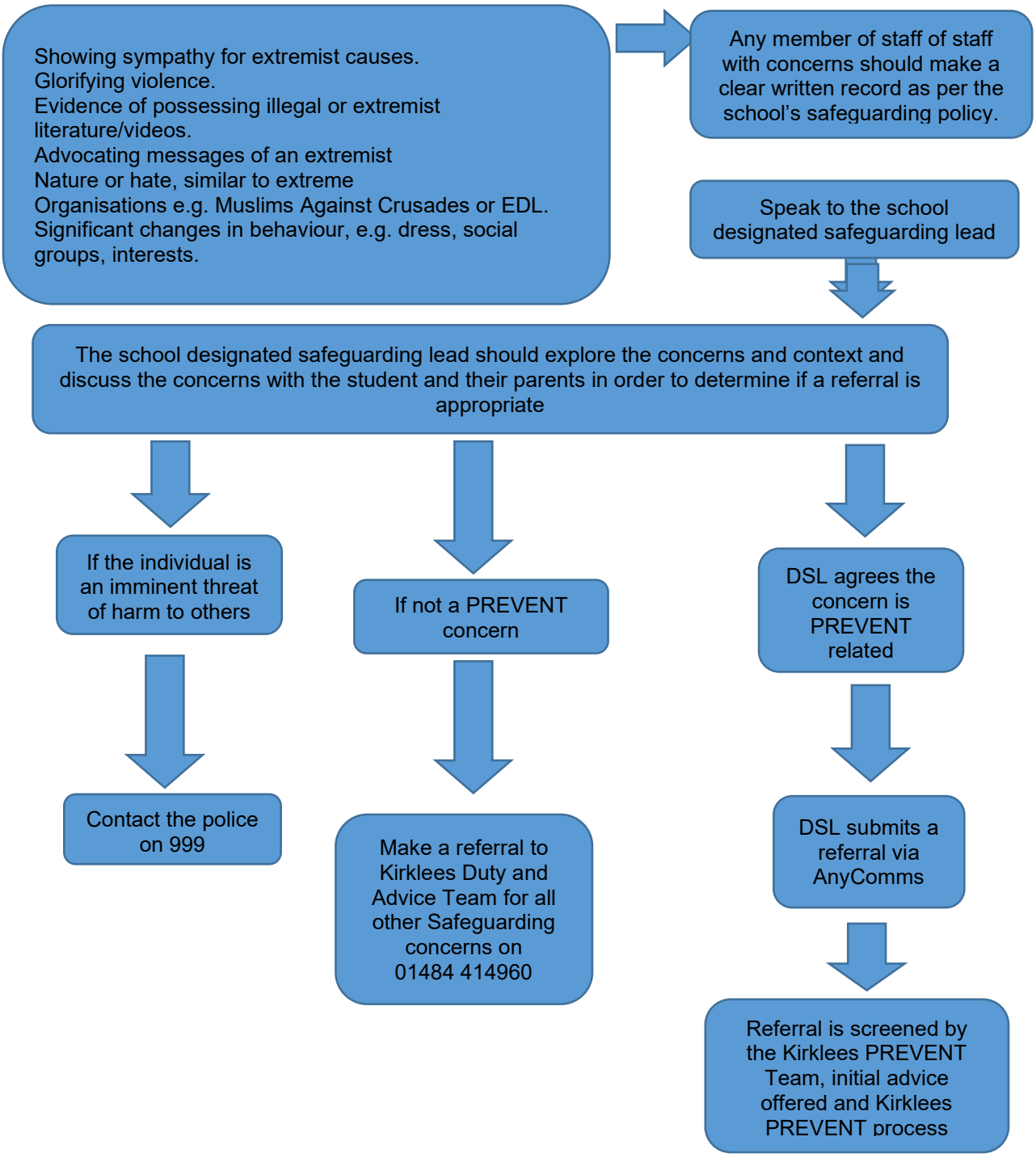
A continuum of children and young people's sexual behaviours (Hackett 2010)



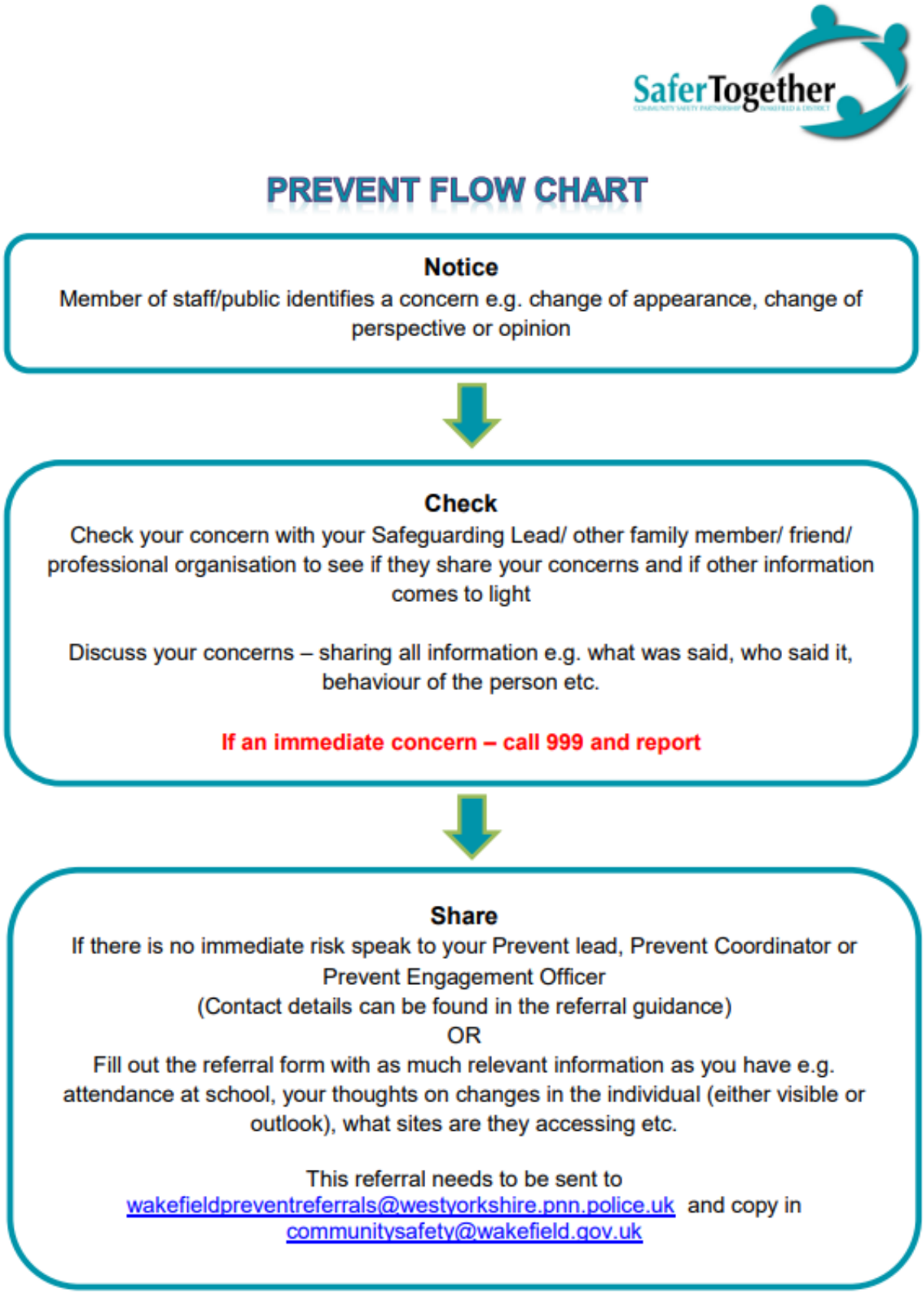
Appendix 5 - KSCP Radicalisation Response Checklist

Summary of in-school procedures to follow where there are potential radicalisation concerns about a child/member of staff

Appendix 10 for further information and relevant guidance documents referred to, are available electronically.

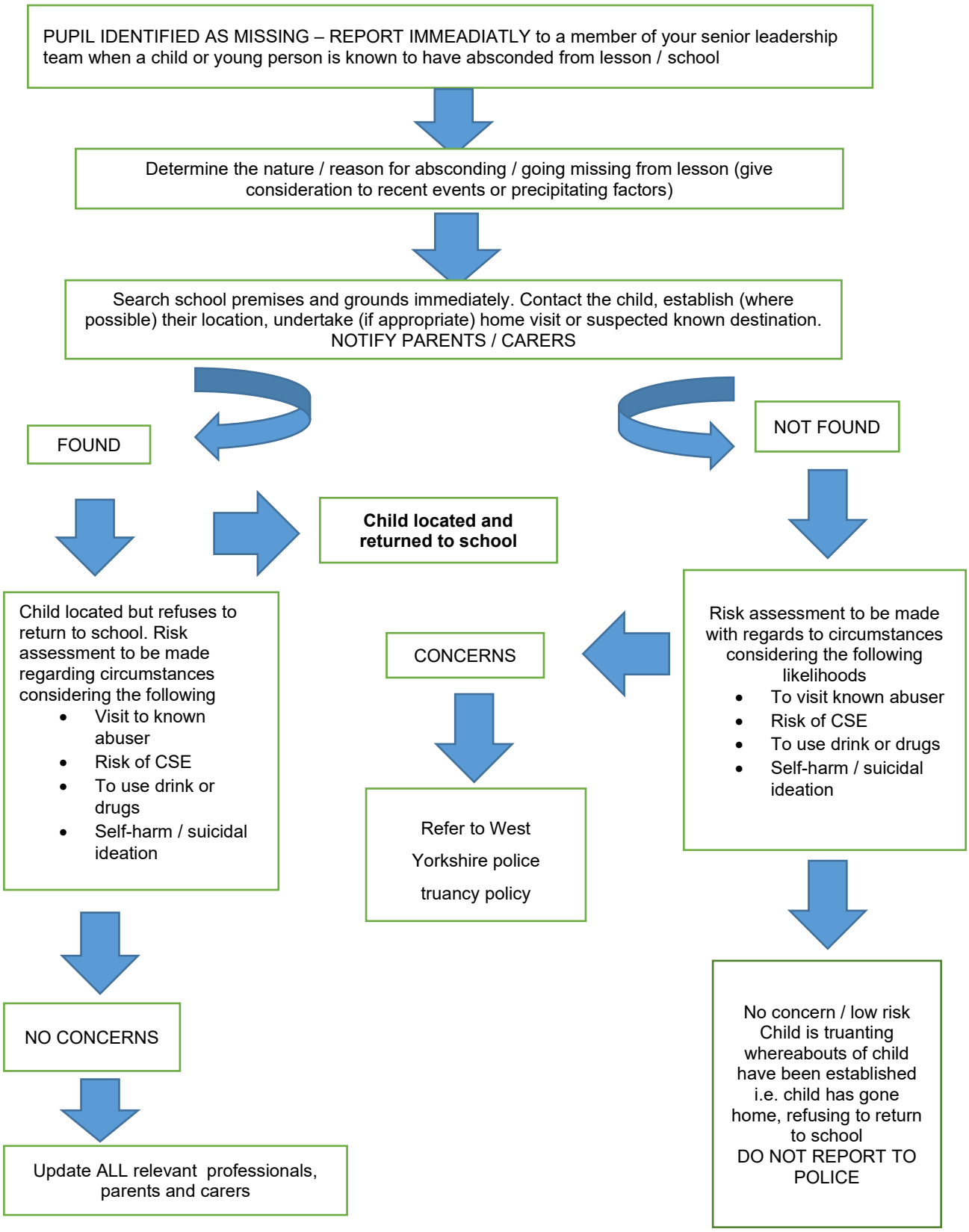


Wakefield Prevent Flow Chart



Appendix 6 - Missing from School Response Checklist

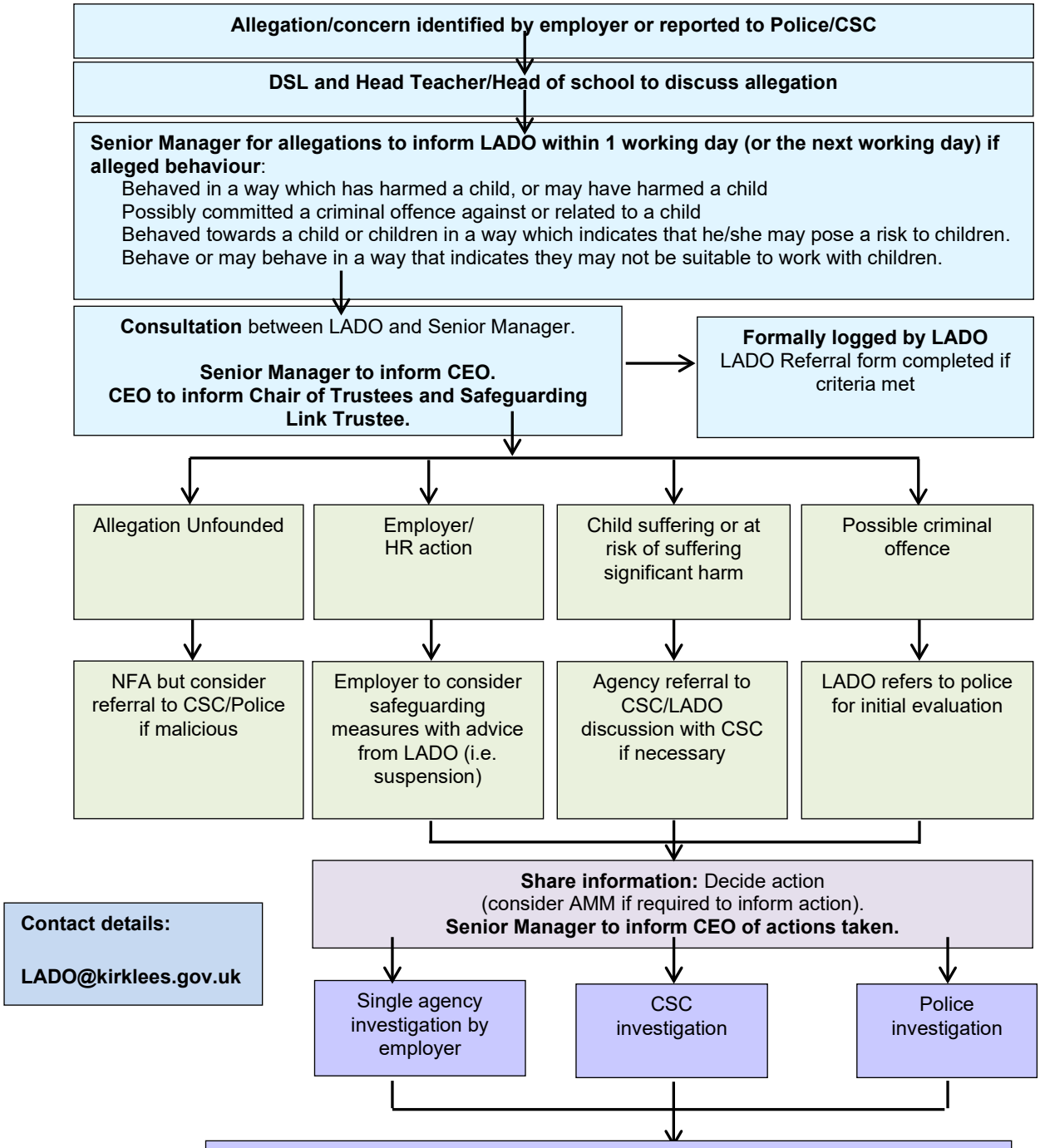
Referral pathway for reporting pupils missing / absconded during the school day.



On students return to school – DSL to talk to pupil and establish reason behind absconding. Discussion should:

1. Ascertain child's views and perceptions
2. Explore reason for absconding (push / pull factors)
3. Allow DSL to undertake an assessment of presenting risk
4. Ensure that appropriate interventions / referrals / support is actioned to address identified risk and minimise

Appendix 7 - Summary of LADO Flowchart for Kirklees



Contact details:

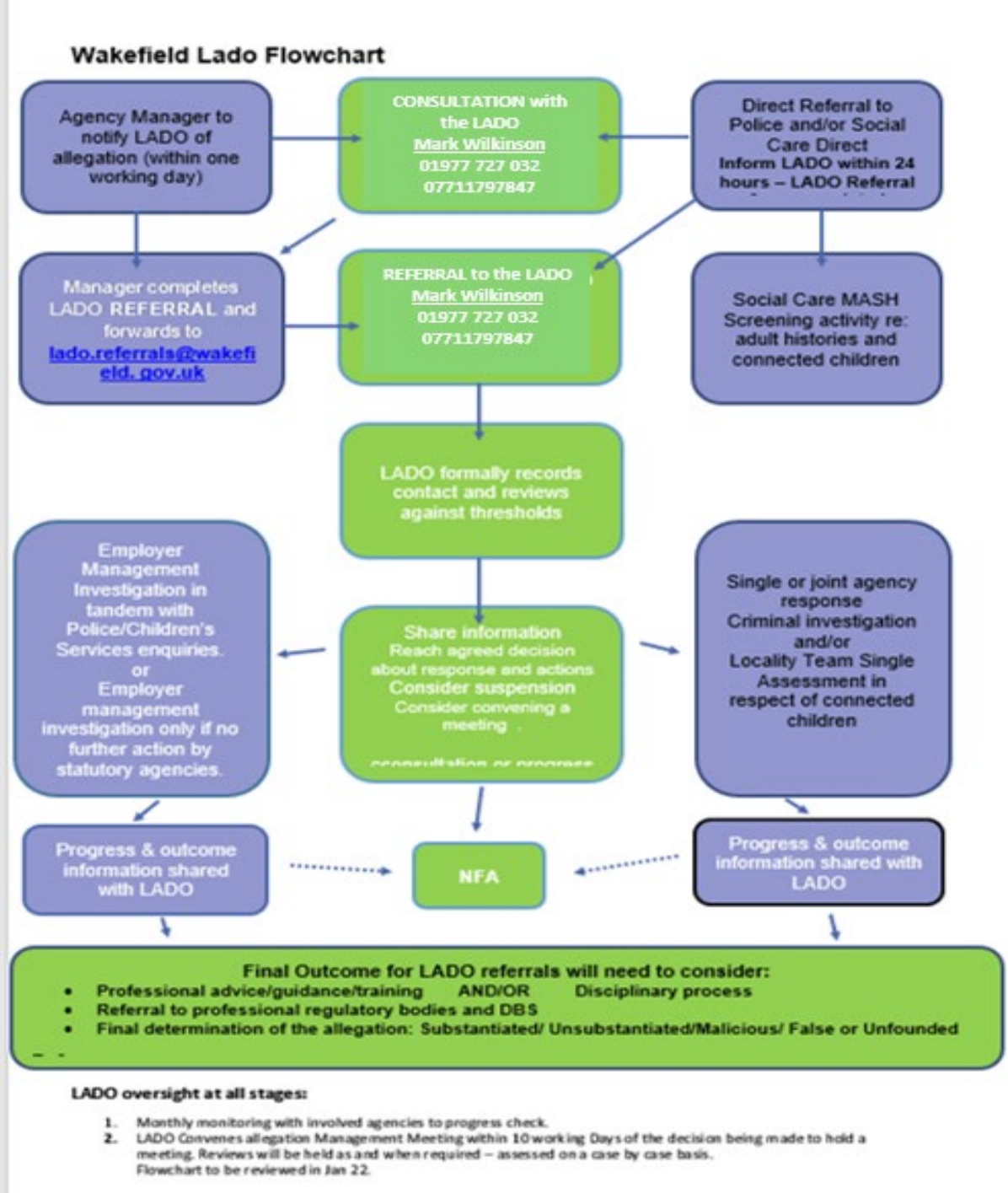
LADO@kirklees.gov.uk

Outcomes and Actions:

Substantiated	Unsubstantiated	Unfounded	Malicious
Disciplinary process	Action Plan and reccomendations	Action Plan and reccomendations	No further action
Professional advice, guidance, training	Professional advice, guidance, training	Professional advice, guidance, training	Professional advice, guidance, training
Criminal prosecution	• Disclosure & Barring Service • Teaching Regulation Agency • Ofsted • Social Work England • Or other identified professional or registered body		
Dismissal			
Referral to →			

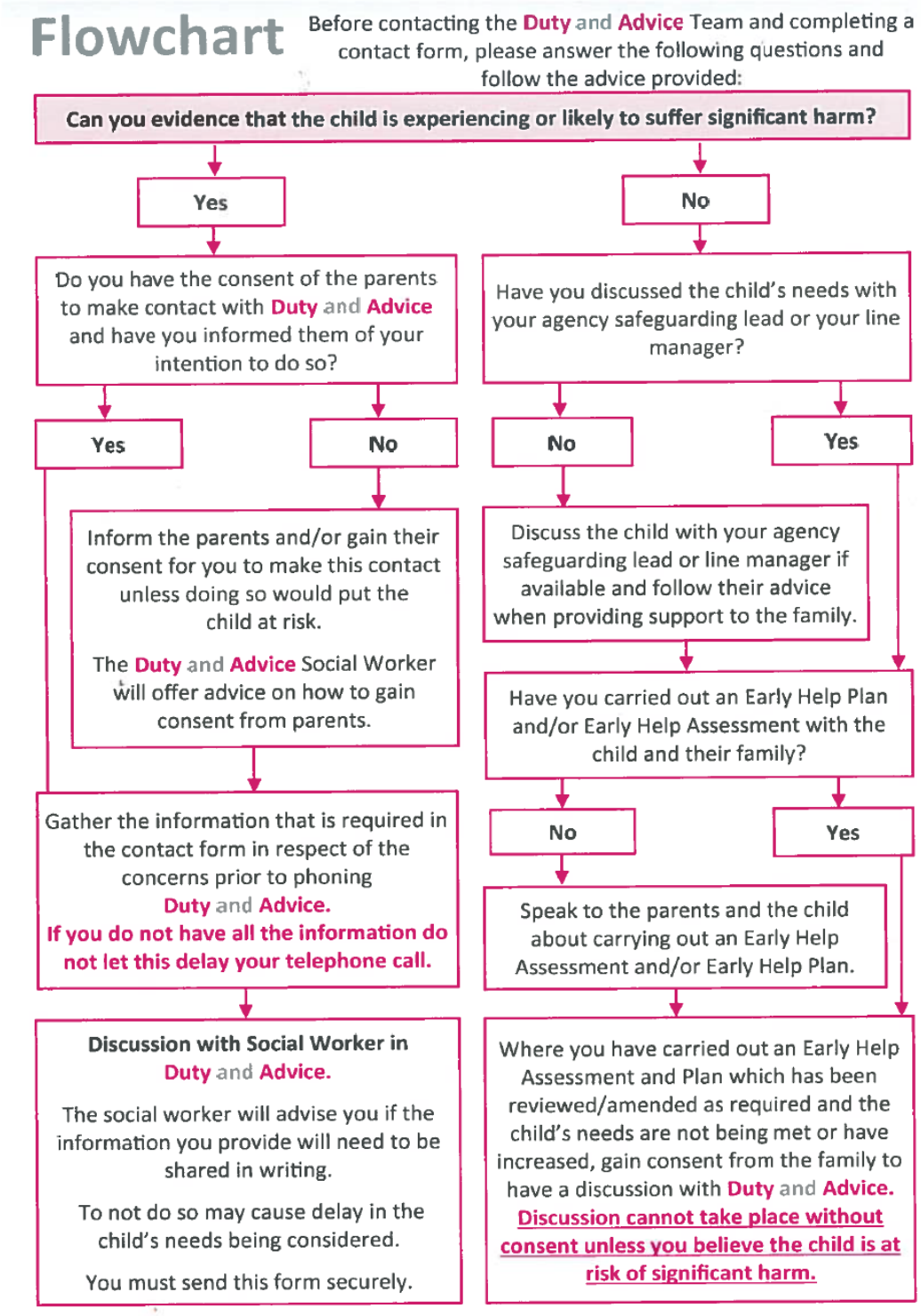
1. **Senior Manager to inform CEO of outcome and agreed actions.**
2. **CEO to inform Chair of Trustees and Safeguarding Link Trustee of outcome and agreed actions.**
3. **Identify any learning for practice.**

Summary of Lado Flowchart for Wakefield

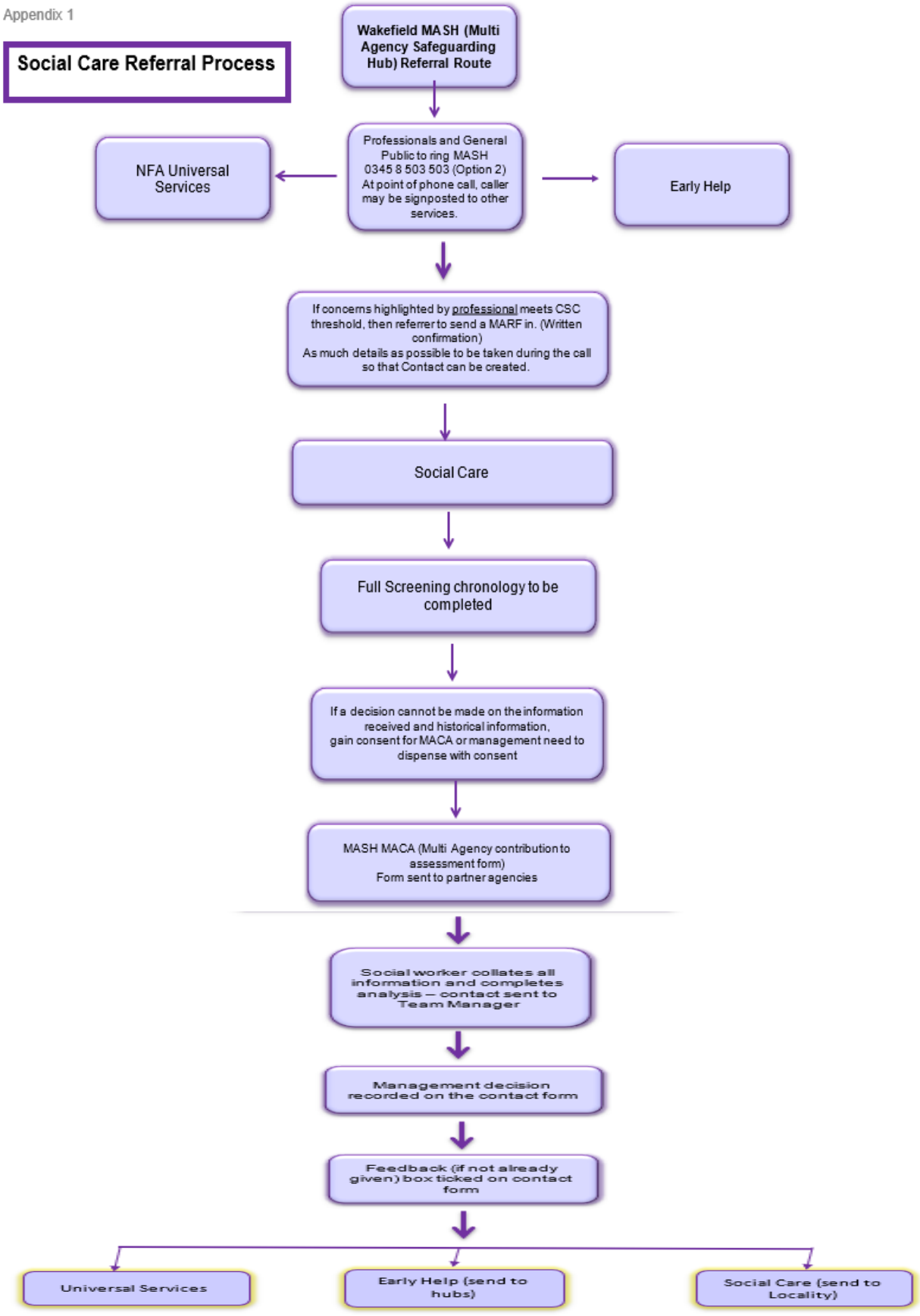


Appendix 8 - School Procedure to follow where there are concerns about a child

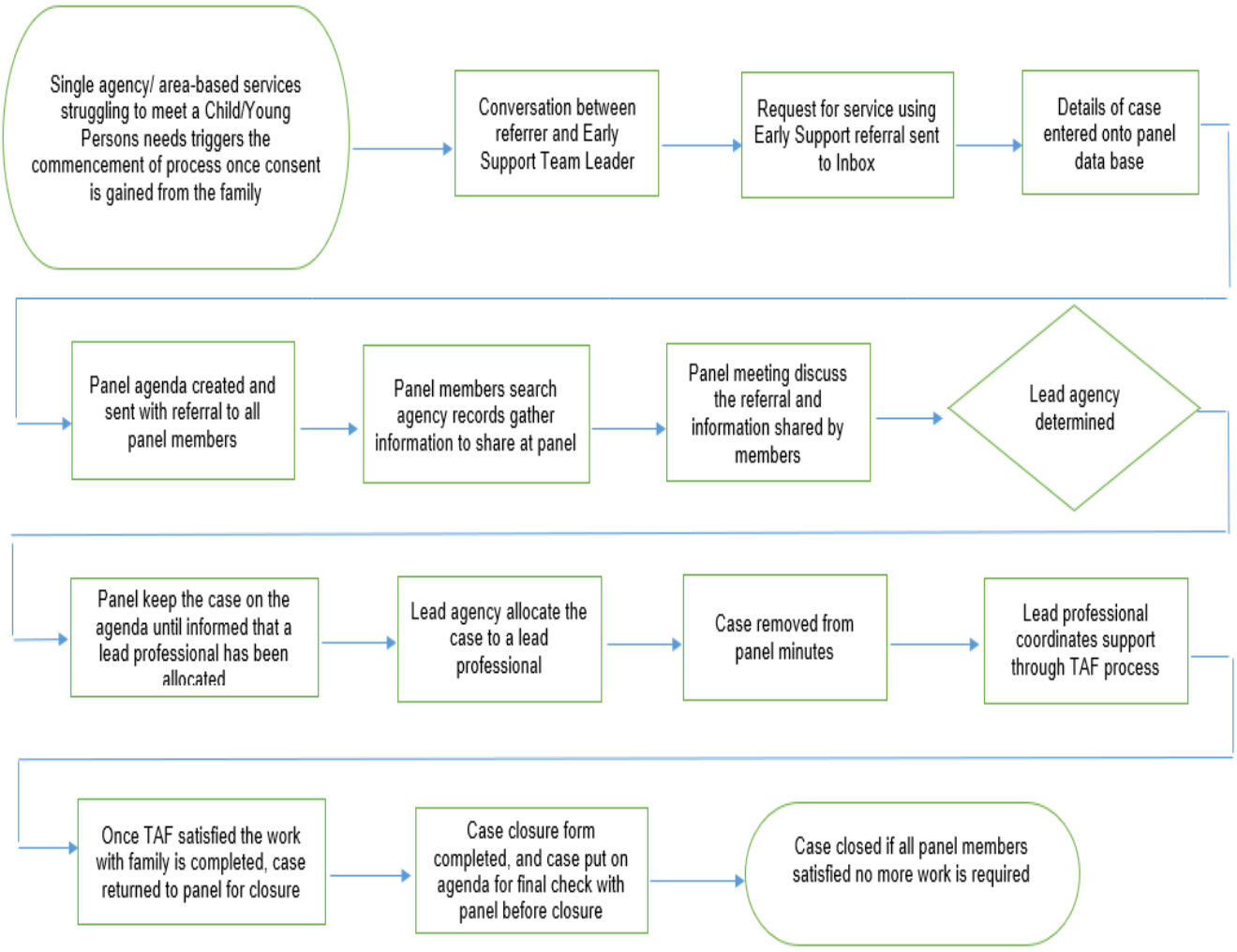
School Procedure to follow where there are concerns about a child in Kirklees



School Procedure to Follow Where There Are Concerns about a Child for Wakefield



Appendix 9 - Early Support Multi Agency Panel Process

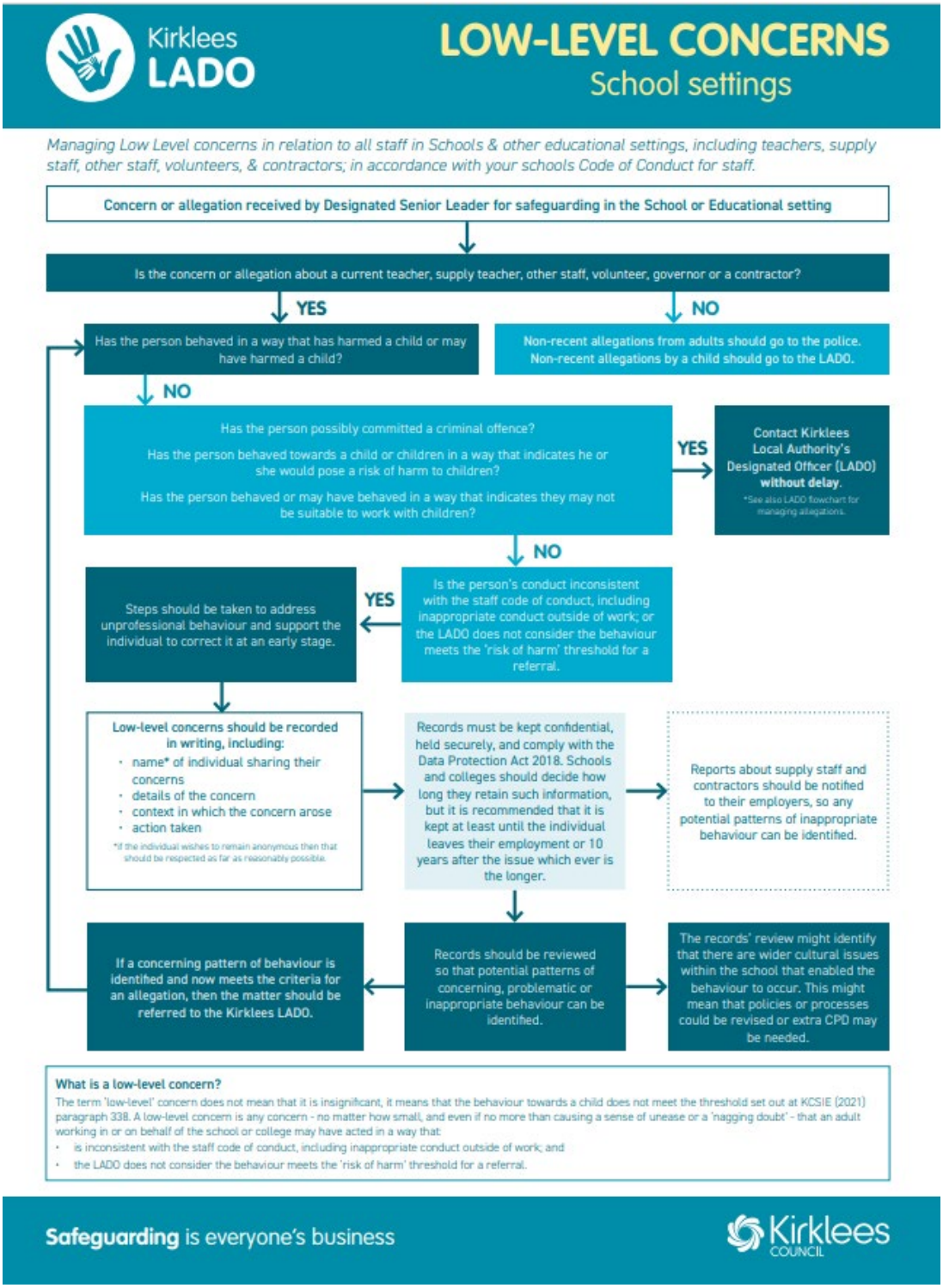


Appendix 10 - Further contact information

Organisation	Contact Information
Child employment Wakefield Leeds	child.employment@kirklees.gov.uk ews@wakefield.gov.uk Child Employment and Entertainment Team: 0113 378 5995, ASTLicensing@leeds.gov.uk
Kirklees Children Missing Education (CME) team Wakefield Leeds	ESS.CME@kirklees.gov.uk educationcme@wakefield.gov.uk cme@leeds.gov.uk, 0113 3789686
Kirklees CSE checklist tool Wakefield CSE checklist tool Leeds	kirkleessafeguardingchildren.co.uk Wakefield Safeguarding Childrens Partnership tel:01924307712 Request for images to be taken off-line https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove/ https://www.leedsscp.org.uk/
Duty & Advice – Kirklees Social Care Direct - Wakefield Leeds Social Care	https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/keeping-children-safe/private-fostering or by calling 01484 414960 Wakefield One Burton Street, Wakefield WF1 2EB tel:03458503503 social_care_direct@wakefield.gov.uk Wakefield's neglact toolkit https://hub.wakefieldscp.org.uk/neglect-toolkit/ Children's Social Work Services (office hours 9am – 5pm) 0113 3760336 Children's Social Work Services – Emergency Duty Team (outside of office hours) 0113 5350600 Local Authority Designated Officer (LADO) 0113 3789687
Virtual School – Kirklees Virtual School – Wakefield Virtual School - Leeds	kirklees.virtualschool@kirklees.gov.uk or by calling 01484 225180 virtualschool@wakefield.gov.uk virtualschool@leeds.gov.uk, 0113 378 1469
Responding to domestic abuse (Operation Encompass School notification) Wakefield – Tracy Corbett Leeds Education Safeguarding Team	Education.safeguardingservice@kirklees.gov.uk Kirklees 01924 304248 domesticabuse@wakefield.gov.uk – 07769284644 0113 3789685, Email: estconsultation@leeds.gov.uk

Kirklees training and support Wakefield training and support Leeds Training and Support	schoolsafeguardingofficer@kirklees.gov.uk Multi-Agency Training Wakefield Safeguarding Children Partnership County Hall Bond Street Wakefield WF1 2QW • wscpevents@wakefield.gov.uk • 01924 307712 • 'Stop it now' helpline available to staff 08081000900/ Stop It Now! UK and Ireland | Preventing child sexual abuse • Training • Wakefield Safeguarding Children (wakefieldscp.org.uk) 0113 3789685, Email: estconsultation@leeds.gov.uk
Kirklees Prevent Wakefield Prevent Leeds Prevent	www.kirklees.gov.uk/prevent or contact the hub via 01924 483747 Anycomms "Prevent Referral" wakefieldpreventreferrals@westyorkshire.pnn.police.uk Council Prevent Team 01924 306645 or CTU 07789 753634 or 07590 357469 prevent@leeds.gov.uk Leeds Prevent Team 0113 535 0810
Honour Based abuse information - Kirklees	https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/different-types-of-abuse/honour-based-violence/

Appendix 11 - Kirklees Low level concerns flowchart



Appendix 12 - Rotherham LADO Threshold Criteria

LADO Investigations would be invoked where there has been an allegation that a person who is employed or volunteers with children has:

- Behaved in a way that has harmed a child
- Possibly committed a criminal offence against a child
- Behaved towards a child or children in a way that indicates that they may pose a risk of harm to children.

It could also include:

- Behaved in a way outside of work or employment which may cause a risk of harm or influence to those children with whom they work or are in contact with.
- Behaved in a way in his or her personal life which could put children at risk of harm.
- Contravened or has continued to contravene safe practice guidance given by his or her organisation of regulatory body
- Exploited or abused a position of power
- Failed to understand or recognise the need for clear personal boundaries in his/ her work.
- Become the subject of criminal proceedings relating to a child or adult which may indicate risk to children, e.g. assault, domestic violence, sexual offences against adults
- Become the subject of Section 47 Enquiries under child protection procedures
- The individual subject to the allegation or concern occupies a “position of trust”
- This may be of a physical, sexual or psychological/emotional nature or by negligence or other non-physical acts e.g. via social media and includes:
- Harming or placing a child at risk of harm by the persons own behaviour(s)
- Failure to take action to prevent harm by another person
- Failure to recognise or accept risk posed by another person e.g. by denial or minimisation
- Inciting harm by another person
- Failure to follow safeguarding guidance, policies and procedures, including safer working practice guidance
- Failure to recognise or meet a child’s welfare or care needs
- Circumstances where, on a particular occasion, harm has not been caused to a child, but if repeated, may do so, either to that child or another child
- Any behaviour that may suggest a future risk of harm to a child e.g. viewing child abuse images; behaviour that could constitute grooming; violence; bullying or frightening children.

It is important to note that the threshold for LADO involvement is lower than the threshold of significant harm applied in child protection section 47 investigations. LADO must satisfy the harm test.
Harm means – ill treatment or impairment of health or development
All agencies should take in to account the following definitions when determining the outcome of allegation investigations:

1. **Substantiated -** There is sufficient identifiable evidence available to prove that what was alleged did happen.

2. **False -** There is sufficient evidence to disprove the allegation; and suggest that it was falsely made.

3. **Malicious -** There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

4. **Unsubstantiated -**This is not the same as a false allegation. It means that there is insufficient evidence to either prove or disprove the allegation; the term therefore does not imply guilt or innocence

5. **Unfounded -** There is evidence available to prove the allegation is not based on fact and there is no substance to the allegation; therefore, it did not happen, It could not have happened or information has been misinterpreted.

*NB. The burden of proof is different to Court of Law. The test applied is on the balance of probabilities rather than beyond all reasonable doubt.

Appendix 13 – Low Level Concerns

This appendix is designed to share with all staff as a summary of what to do when they have a low level concern and what steps will be taken following a concern being raised. Additional details on low level concerns are dealt with in the main body of the Policy.

Definition of a Low Level Concern

A low-level concern is a behaviour towards a child by a member of staff that is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. For example, this may include:

- Being over-friendly with pupils
- Having favourites;
- Taking photographs of pupils on a personal device;
- Engaging in one-to-one activities where they can't easily be seen;
- Using inappropriate language;
- Low-level concerns can include inappropriate conduct inside and outside of work.

This list is not exhaustive and most importantly, if staff feel something is "not right" or they experience a "nagging doubt" they are encouraged to raise it with the appropriate person (detailed below).

Why raise concerns?

All staff are encouraged to raise concerns – this is in the same way as the many concerns are logged daily in our academies around children and safeguarding on our systems. In our Trust, we want to encourage a culture of openness, honesty and most importantly, one that is safe for all pupils, staff and other stakeholders. Your "nagging doubt" could be one of many that you may not have seen or had access to, but could form part of a much bigger picture or concern. In addition, the Trust wants to ensure that staff are all well equipped and trained to carry out their roles well and safely. Concerns raised may be addressed via early intervention meaning that a concerning practice does not become bigger over time, resulting in potential harm to the staff member and our pupils. Any concerns will be handled with appropriate sensitivity and confidentiality.

Please note that staff can also self refer if they identify in themselves that their behaviour may be considered a low level concern and they need support.

What to do if you have a concern

If you have a concern, please raise directly with your Headteacher or Head of School. If you have a concern about a Central Team member, this should be raised with the CEO. If you have a concern about a Headteacher/Head of School/Exec Head you should contact the Chair of Trustees. If you have a concern about a supply worker or contractor you should contact the Headteacher. Staff may raise concerns via any means – in person, email or phone. All concerns will be acknowledged via email and appropriate follow up will be completed by the Headteacher/Head of School/CEO. Please note that staff may not always receive a follow up regarding what action has been taken as this is likely to be confidential however, this should not deter staff from raising future concerns.

All concerns are logged by the Headteacher/Head of School/CEO in a file that can only be accessed by them and members of the HR team. This file is reviewed on at least a half termly basis to identify any patterns in behaviour that may cause further concern.

Appendix 14 - Supporting pupils in the Digital Age: Guidance for Parents and Carers

Stay Actively Engaged in Your Child's Digital Life

If your child does have a smartphone, consider the following steps:

- Have an open-phone policy – regularly check messages and social media to see who they are communicating with.
- Limit access at night – keep phones and other devices downstairs overnight to reduce social media use at bedtime.
- Talk to them about their online presence – ask what apps they use, what privacy settings they have, and who they interact with.
- Educate yourself – learn about online subcultures that may promote harmful ideologies, such as incel forums, so you can have informed discussions.

Teach the Importance of Healthy Relationships

Encourage open conversations about respect, consent, and appropriate interactions to help your child develop a healthy understanding of relationships. For example:

- Normalise discussions about respect and boundaries
- Teach your child that consent is not just about sex - it applies to personal space, sharing information and emotional boundaries
- Use age appropriate examples - hugging a friend, borrowing something from a peer.
- Discuss media portrayals of or masculinity in films, music and social media
- Challenge harmful attitudes - e.g. *boys will be boys*
- Teach your child that real strength comes from respect and empathy and not dominance or control.

Encourage Critical Thinking About Online Content

Engaging in open discussions about the potential dangers of online material—including the spread of misogynistic ideologies—can help raise awareness and promote independent thinking. Encourage your child to:

- Be skeptical, not cynical – Ask: Who wrote this? Why was it written?
- Recognise bias – Not everything online is true, and even reputable sources can have an agenda.
- Spot manipulation tactics – Identify clickbait headlines, emotionally charged language, and confirmation bias.
- Be aware of AI-generated content – Show them how to fact-check claims using multiple sources before forming an opinion.

Provide Positive Male Role Models

Boys need strong, positive influences in their lives. Fathers, male carers, and mentors can model empathy, respect, and emotional expression to counteract societal pressures that equate masculinity with aggression or emotional suppression.

Need Further Support?

If you are concerned about your child's online activity or any views they have expressed, please contact the Designated Safeguarding Lea in your school. We are here to support you and can signpost you to further resources if needed.

By working together, we can help young people navigate the digital world safely and confidently.