Star

NURTURING TODAY'S YOUNG PEOPLE,
INSPIRING TOMORROW'S LEADERS

SAFEGUARDING (CHILD PROTECTION) POLICY

Document control

This document has been approved for operation within:	All Trust Schools
Date of last review	July 2020
Date of next review	July 2021
Review period	1 Year
Status	Statutory
Owner	Star Academies
Version	7

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Key safeguarding information

Key Staff	
Designated Safeguarding Lead	Insert name, email and tel number
Deputy Designated Safeguarding Lead(s)	Insert name
Designated Prevent Lead(s)	Insert name
Designated teacher for Looked After Children	Insert name
Designated Operation Encompass Lead *(where applicable)*	Insert name
Lead Governor for Safeguarding and Child Protection	Insert name
Star Central Lead for Safeguarding	Emma Starkey

Key External Contacts	
Police	insert telephone number
Local Authority Children's Social Care	insert local authority contact address T: insert tel E:insert email
Local Authority Designated Officer (LADO)	insert name T: Insert tel number – MUST BE INCLUDED E: insert email
Safeguarding Partners website	insert website
Channel/Prevent Lead	insert name
Local Children's Centre	insert name

Key Documentation (including hyperlinks)
Coronavirus (COVID-19): safeguarding in schools, colleges and other providers
Keeping Children Safe in Education (DfE 2020)
Working Together To Safeguard Children (DfE 2018)
What To Do If You're Worried A Child Is Being Abused (DfE 2015)
Child Sexual Exploitation: Definition and Guide for Practitioners
Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People
Sexual violence and sexual harassment in schools (DfE 2018)
Disqualification Under the Childcare Act 2006
Prevent Duty Guidance for England and Wales
DBS Identification Checking Guidelines
The Use of Social Media for Online Radicalisation (Home Office, 2015)
Promoting Fundamental British Values Through SMSC
Regulated Activity in Relation to Children (DfE 2016)
Teacher Status Checks - Employer Access Online
Guidance for the Employment Of Overseas Applicants
Guidance for the Employment of Overseas Trained Teachers
• Inspecting safeguarding in early years, education and skills settings
• Guidance for Safer Working Practice

Useful Sites	
Channel general awareness online training module	Home Office FGM e-learning
UK Safer Internet Centre	ThinkuKnow
Educate Against Hate	DisrespectNobody
Home Office PREVENT e-learning	NSPCC

Introduction

1. Star Academies recognises its moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment in all our schools where children are respected and valued.
2. In line with government guidance, this policy is supported by the Covid–19 Addendum, which reflects the safeguarding procedures schools should put in place if there is a partial or full closure of a school due to coronavirus.
3. This policy is written with regard to:
   - Department for Education (DfE*) Guidance Keeping Children Safe in Education 2020*;
   - Home Office guidance C*hannel: Protecting Vulnerable People from Being Drawn into Terrorism* issued in 2015;
   - Home Office guidance *Prevent Duty Guidance in England and Wales* issued in 2015 and the associated *The Prevent Duty: Departmental advice for schools and childcare providers* subsequently issued by DfE in 2015;
   - Home Office guidance *Channel: Vulnerability Assessment Framework* issued in 2012;
   - *DfE Guidance Working Together to Safeguard Children issued in 2018;*
   - *DfE Guidance What To Do If You're Worried A Child Is Being Abused issued in 2015;*
   - *DfE Guidance Disqualification Under the Childcare Act 2006 issued in 2018*;
   - Voyeurism Act 2019;
   - *Children Missing Education* - statutory guidance September 2016;
   - *Data Protection Toolkit for Schools* August 2018;
   - *Guidance for Safer Working Practices* May 2019 v2;
   - *Information sharing advice practitioners safeguarding services* - July 2018;
   - *Mental health and behaviour in schools* November 2018;
   - *Regulated activity in relation to children* 2012;
   - *Searching screening and confiscation* January 2018;
   - *Sexting in schools and colleges* UKCCIS August 2016;
   - *Sexual violence and sexual harassment between children in schools and colleges* May 2018;
   - *Teaching online safety in school* June 2019
4. It applies to all governors, teaching, non-teaching and volunteer members of staff.
5. Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children. In line with this requirement, Star Academies has systems in place which are designed to:
   - prevent unsuitable people working with, or coming into contact with pupils within school;
   - promote safe practice and challenge poor or unsafe practice;
   - identify pupils who are suffering or likely to suffer significant harm[1] and take appropriate action with the aim of making sure they are kept safe both at home and at school;

[1] Significant harm can be defined as 'the ill-treatment or impairment of health and development of a child or young person' where:
- development includes physical, intellectual, emotional, social or behavioural development
- health includes physical and mental health
- ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

- identify pupils who may be susceptible to messages of violence and radicalisation and take appropriate action to ensure early intervention challenges extreme ideologies and diverts young people from the risk they face before illegality occurs;
- contribute to effective partnership working between all those involved with providing services for pupils.

6. There are three main elements to the Safeguarding (Child Protection) Policy:
   - prevention – a commitment to early help and identification of unmet needs and vulnerabilities and partnerships with agencies to promote the welfare of pupils and keep children safe;
   - protection - all staff and volunteers are trained to recognise and respond to abuse and neglect and are expected to be vigilant and act quickly when they suspect a child is suffering, or is likely to suffer, harm (in line with the Safeguarding Partners procedures);
   - support – recognition of the sensitivity and complex nature of safeguarding and child protection, ensuring that pupils, staff and families are supported appropriately.

Aims

7. To ensure that all practices of a school and its stakeholders contribute towards the safeguarding and promoting of the welfare of all of our young people – pupils' welfare is of paramount importance.
8. To emphasise how the safeguarding and promoting of the welfare of all of our young people is the primary responsibility of all staff, volunteers and governors.
9. To detail the procedures to follow to ensure the safe recruitment of staff, governors and volunteers to a School.
10. To outline the safe working practices that all staff, governors and volunteers should undertake when working with young people at a School.
11. To communicate clear procedures for identifying, reporting and recording suspected cases of abuse, extremism and radicalisation.
12. To support the mission, vision and values of the Trust and its establishments.

Who is responsible for the policy?

13. The Trust has overall responsibility for the development and effective operation of this policy. The Trust has delegated day-to-day responsibility for operating the policy to Star Central, the Local Governing Body and the Principal at each Trust school.
14. The Local Governing Body and Senior Leadership Team at each Trust school has a specific responsibility to ensure the fair application of this policy and all are responsible for supporting colleagues and ensuring its success.
15. This policy must be implemented alongside the procedural guidance set out by the Local Authority.

Whole-school approach

16. Governing bodies should ensure they facilitate a whole-school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, governing bodies and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback.

Terminology

17. **Safeguarding and promoting the welfare of children i**s defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (Keeping Children Safe in Education, DfE, 2020).
18. **Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm (Children Act 1989).
19. **Child in Need** refers to a child that is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority (Children Act 1989).
20. **Children missing education**, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation. It is important the school or college's response to children missing education supports identifying such abuse and also helps prevent the risk of them going missing in future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community. Further information and support, include:
    - schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points can be found in the department's statutory guidance: Children Missing Education;
    - further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges;
    - general information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy.
21. Any child may benefit from **early help**, but all school and college staff should be particularly alert to the potential need for early help for a child who:
    - is disabled and has specific additional needs;
    - has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
    - has a mental health need;
    - is a young carer;

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of honour based abuse such as Female Genital Mutilation or forced marriage;
- is a privately fostered child; and
- is persistently absent from education (Keeping Children Safe in Education, DFE, 2020)

22. **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism *(Keeping Children Safe in Education, DfE, 2020).*
23. **Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (*Prevent Strategy, Home Office, 2011).*
24. **Non-violent extremism** is extremism, as defined above, which is not accompanied by violence *(Prevent Duty Guidance, Home Office, 2015).*
25. The current UK definition of **'terrorism'** is given in the Terrorism Act 2000 (TACT 2000). In summary, this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause (*Prevent Duty Guidance, Home Office, 2015*).
26. An **ideology** is a set of beliefs (Prevent Strategy, Home Office, 2011).
27. **Female Genital Mutilation** (FGM) is a procedure involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse *(Keeping Children Safe in Education, DfE, 2020*).
28. **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in 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 advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, 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. (*Keeping Children Safe in Education, DfE, 2020).*

29. **Mental health** problems can affect many of our young people, they include depression, anxiety and conduct disorder and often have a direct response to what is happening in their lives. It can also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a concern about a child's mental health that is also a safeguarding concern, then immediate action should be taken.
30. **Upskirting** refers to the act of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks (with or without clothing). Despite the name, anyone (including both pupils and teachers), and any gender, can be a victim of upskirting.
31. The term '**allegation'** means where it is alleged that a person who works with children has behaved in a way that has harmed a child, or may have harmed a child, possibly committed a criminal offence against or related to a child or, behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
32. References made to adults and **staff** refer to all those who work with pupils in an educational establishment, in either a paid or unpaid capacity. This would also include, for example, those who are not directly employed by the school or setting, e.g. local authority staff, sports coaches, governors, or trustees.
33. References made to '**child'** and 'children' refer to children and young people under the age of 18 years. However, the principles of the document apply to professional behaviours towards all pupils, including those over the age of 18 years. 'Child' should therefore be read to mean any pupil at the education establishment.
34. **Parent** refers to birth parents and other adults who have legal responsibility for the child, for example step-parents, foster carers and adoptive parents or legal guardian(s).

The Trust's commitment

35. Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating.
36. The Trust is committed to providing safe, caring and welcoming environments where every child is able to reach their full potential free from harm, abuse and discrimination. All staff and volunteers are expected to discharge their safeguarding responsibilities effectively and recognise that high self-esteem, confidence, peer support and clear lines of communication with trusted adults helps all children, especially those at risk of or suffering abuse, to thrive.
37. Schools are alert to the signs of abuse, neglect and radicalisation and follow procedures to ensure that children receive effective support, protection and justice.
38. Schools will work with social care, the police, health services and other services (such as Channel co-ordinators/Police Practitioners where appropriate) to promote the welfare of children and protect them from harm.

Role of Star Academies

39. The Trust has responsibility for development and review of the Safeguarding (Child Protection) Policy and for ensuring compliance with the relevant statutory framework. The policy is designed to ensure that effective systems and procedures are in place to safeguard and promote the welfare of young people.
40. Star Central will support the Trust Schools to ensure the effective implementation of the Safeguarding (Child Protection) Policy.

Role of the Local Governing Body

41. The Local Governing Body is expected to:

- monitor the School's compliance with the Safeguarding (Child Protection) Policy and ensure that it is provided to and read by all staff – including temporary staff and volunteers on induction;
- ensure all staff read at least Part 1 of Keeping Children Safe in Education (DfE 2020);
- have a lead person for safeguarding and child protection on the Governing Body who liaises with the Principal, Local Authority and/or partner agencies on these matters;
- ensure that the school contributes to inter-agency working in line with the statutory guidance Working Together to Safeguard Children (DfE, 2018) including providing a coordinated offer of early help when additional needs are identified, contributing to inter-agency plans to provide additional support to children subject to child protection plans and allowing the Local Authority to conduct a section 17 or section 47 assessment;
- recognise the importance of information sharing between professionals and local agencies;
- ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data protection Act 2018 and the GDPR;
- ensure that school systems and procedures take into account the procedures and practice of the Local Authority as part of the inter-agency safeguarding procedures set up by the Safeguarding Partners;
- verify that the School operates safer recruitment procedures and fulfils its statutory duty to ensure that appropriate checks are carried out on all staff and volunteers at the School;
- ensure that the School has clear steps for dealing with allegations of abuse against members of staff and volunteers that comply with locally agreed guidance and Keeping Children Safe in Education (2020);
- ensure that a member of the Governing Body is nominated to liaise with Star Central, the Local Authority and partner agencies in the event of an allegation being made against the Principal;
- ensure the Staff Code of Conduct is upheld and provided to all staff including temporary members of staff;
- ensure that a senior leader(s) (Designated Safeguarding Lead) in the School is designated with lead responsibility for dealing with child protection issues who will provide support to staff members to carry out their safeguarding duties and liaise closely with other services such as Children's Social Care and where appropriate Channel co-ordinators/Police Practitioners;
- ensure that the Designated Safeguarding Lead(s) within school have regular training from the Safeguarding Partners;

- ensure that a senior leader in the School is designated to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training;
- ensure the School, in the exercise of its function, fulfils its duty to have "due regard to the need to prevent people from being drawn into terrorism";
- ensure that the Designated Safeguarding Lead(s) receives regular training from appropriate agencies with regard to the Prevent Agenda and raising awareness and vigilance to reduce extremism and protect vulnerable people from radicalisation;
- ensure there are procedures in place to make a referral to the Disclosure and Barring Service if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned (this is a legal duty and failure to refer when the criteria is met is a criminal offence);
- ensure all staff receive induction training, regular updates on child protection issues and annual safeguarding training on child protection issues;
- ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe through provision of training on child protection issues;
- ensure appropriate safeguarding procedures and responses are in place for children who go missing in education;
- ensure there are procedures in place to handle allegations against other children;
- ensure there is a clear accountability for the commissioning and/or provision of the services designed to safeguard and promote the welfare of children;
- ensure school staff fulfil their statutory duty to report to the police any discovery that Female Genital Mutilation appears to have been carried out on a girl under 18;
- where services of activities are provided on the school premises by another body, ensure the body concerned has the appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the School on these matters where appropriate;
- ensure it considers how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social and health education (PSHE), and/or through relationship, sex and health education (RSHE);
- ensure the School has appropriate filters and monitoring in place to ensure children are safeguarded from potentially harmful and inappropriate online material;
- ensure all systems within School have the child's best interest at heart.

42. For the purposes of accountability, the Governing Body will receive a termly update on safeguarding as part of the Principal's Report. The School's LGB dashboard will also include a safeguarding summary.

Role of the Principal

43. The Principal is expected to:

- ensure that the Safeguarding (Child Protection) Policy and procedures are implemented and followed by all staff;
- ensure the Designated Safeguarding Lead(s) is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children;
- identify a Designated Teacher with responsibilities for promoting the educational achievement of looked after children (LAC) who is expected to undertake appropriate training. Their responsibilities will be set out in their Job Description (Appendix 2).
- ensure all staff receive induction training, regular updates on child protection issues and annual safeguarding training on child protection issues;
- appoint an investigating officer to be the case manager who will liaise with the Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against a member of staff or volunteer;
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures;
- ensure that pupils' safety and welfare is addressed through the curriculum;
- ensure appropriate arrangements are in place to ensure staff fulfil their statutory duty to report to the police any discovery that Female Genital Mutilation appears to have been carried out on a girl under 18;
- ensure the School has arrangements in place to fulfil its duty to have "due regard to the need to prevent people from being drawn into terrorism";
- ensure the School has arrangements in place to monitor and respond to children who go missing from education;
- ensure the School fulfils its responsibility to complete the 157/175 Audit in liaison with the Safeguarding Partners;
- ensure the School fulfils its responsibility to complete a PREVENT Risk Assessment.

Role of the Designated Safeguarding Lead(s)

44. The Designated Safeguarding Lead will be a member of the Senior Leadership Team and their responsibilities will be set out in their Job Description (Appendix 1).

45. All safeguarding concerns, suspicions and disclosures are reported to the School's Designated Safeguarding Lead for Safeguarding and Child Protection.

46. The Designated Safeguarding Lead will:

- have a working knowledge of how the Local Authority conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the Safeguarding (Child Protection) Policy and procedures and has read at least Part 1 of Keeping Children Safe in Education (DfE, 2020), especially new and part time staff;
- ensure all staff receive induction training, regular updates on child protection issues and annual safeguarding training on child protection issues;

- be alert to the specific requirements of children in need, those with Special Educational Needs and young carers;
- keep detailed, accurate, secure records of concerns and referrals;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them;
- work with the Trust in the annual review of the Safeguarding (Child Protection) Policy and procedures;
- ensure the Safeguarding (Child Protection) Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- Where applicable, complete the Local Authority 157/175 Audit;
- complete an annual PREVENT Risk Assessment;
- link with appropriate outside agencies to ensure staff receive training on the Prevent Agenda, and the means by which to identify extremism and prevent radicalisation and what to do to support them;
- understand the Channel Panel referral system;
- ensure the School Single Central Record is maintained and up-to-date;
- keep a record of staff attendance at safeguarding and child protection training;
- consider whether it is appropriate to share any information with the new school or college in advance of a pupil leaving, in addition to the child protection file. Keeping Children Safe in Education, DfE 2020, gives the example of information that would allow the new school or college to continue supporting a victim of abuse and have the appropriate support in place for the pupil's arrival;
- where children leave the school, ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt is obtained;
- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- take the lead with Early Help support where appropriate (Keeping Children Safe in Education, DfE, 2020);
- ensure school staff are aware of their statutory duty to report to the police any discovery that Female Genital Mutilation appears to have been carried out on a girl under 18.
- Where applicable, ensure that the school has suitably trained Key Adult/s in order to fulfil its obligations under Operation Encompass.
- Where applicable, ensure that the school's commitment to Operation Encompass is known throughout the school community via the means of staff training, parental letters, posters and the school website.

47. In managing referrals, the Designated Safeguarding Lead will:

- refer all cases of suspected abuse to the Local Authority Children's Social Care team and:
  - the Local Authority Designated Officer (LADO) for child protection concerns (all cases which concern a staff member);
  - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child);
  - use the NPCC guidance for when to call the police;

- liaise with the Principal to inform them of issues, especially on-going enquiries under section 47 of the Children Act 1989 and police investigations;
- act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

48. At least one Deputy Designated Safeguarding Lead will be identified in school and trained to the same standard as the Designated Safeguarding Lead. The Designated Safeguarding Lead will, however, take lead responsibility.

49. During term time, the Designated Safeguarding Lead and/or Deputy Designated Safeguarding Lead will always be available (during school time) for staff to discuss safeguarding concerns. Appropriate cover will also be put in place to cover out of hours/out of term time activities.

Role of staff

50. All staff have a responsibility to provide a safe environment in which to learn.

51. All staff have a responsibility to identify children who may benefit from early help, who are suffering, or are likely to suffer, significant harm or who express extremist ideologies and are thus vulnerable to radicalisation and to take appropriate action, working with other services as needed.

52. All staff are expected to:

- read at least part one of the DfE guidance document 'Keeping Children Safe in Education' 2020;
- be aware of systems within the School which support safeguarding (e.g. Safeguarding Policy, Staff Code of Conduct, identity and role of the Designated Safeguarding Lead) and how to report safeguarding concerns;
- be aware of the early help process and understand their role in it, including liaising with the Designated Safeguarding Lead, sharing information and in some cases acting as the lead professional. The following indicators help staff recognise the potential need for early help:
  - the child is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
  - the child is at risk of modern slavery, trafficking or exploitation;
  - the child is showing early signs of abuse and/or neglect;
  - the child is at risk of being radicalised or exploited;
  - the child is a privately fostered child (*Keeping Children Safe in Education, DfE, 2020)*
- be aware of the process for making referrals to Children's Social Care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments;
- be familiar with, and implement, safe working practices outlined in this policy (Appendix 3) and other school procedures;
- be familiar with and alert to the key indicators of abuse, neglect and vulnerability to radicalisation;
- ensure that they take all reasonable steps to minimise the risk of harm to young people at the School and home;
- ensure they take all reasonable steps to challenge extremist ideologies;
- contribute to a supportive culture where young people are able to report concerns;

- involve the appropriate member(s) of staff when a child informs them that he/she is being abused (Keeping Children Safe in Education, DfE, 2020);
- report any abuse, suspected abuse or concerns regarding extremism/radicalisation to the Designated Safeguarding Lead(s) immediately and, where required, support social workers to take decisions about individual children;
- report any concerns regarding the behaviour of an adult working at the School to the Principal; and if the concern is regarding the Principal, then report this to the Chief Executive of the Trust;
- undertake annual safeguarding and child protection and Prevent training;
- maintain an attitude of 'it could happen' here;
- promote fundamental British values, including democracy, the rule of law, individual liberty, freedom of speech, freedom of thought, freedom of association and mutual respect and tolerance of different faiths and beliefs;
- liaise with the Designated Safeguarding Lead to report to the police any discovery that Female Genital Mutilation appears to have been carried out on a girl under 18,
- discuss any concerns with the Designated Safeguarding Lead relating to possible indicators that a child may be vulnerable to Female Genital Mutilation;
- be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:
    - bullying (including cyberbullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
    - sexual violence and sexual harassment;
    - sexting (also known as youth produced sexual imagery);
    - initiation/hazing type violence and rituals.
- be clear as to the School's policy and procedures with regards to peer on peer on peer abuse (Keeping Children Safe in Education, DfE, 2020).

Confidentiality

53. All staff are expected to:
    - ensure that information they receive about pupils is treated in a discreet and confidential manner;
    - seek advice from a senior member of staff if they are in any doubt about sharing information they hold or which has been requested of them;
    - be cautious about passing information to others about a pupil.

54. School leaders should ensure that all staff who need to share 'special category personal data' are aware that the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition.

Role of the Every Child Matters Group

55. The Every Child Matters' (ECM) Group will play an important role in safeguarding and promoting the welfare of children in the School. The aim of the ECM Group is to:
    - enhance the School's provision for the safeguarding and promotion of the welfare of pupils;
    - provide a comprehensive Pupil Support Package that will allow the School to put into place support measures which are fully inclusive and wide ranging;
    - ensure that pastoral support to pupils is personalised and responsive to need;
    - ensure that pupils with personalised pastoral needs make good to outstanding academic progress in line with their peers in school;
    - ensure that external support is sought where relevant and appropriate for particular pupils with complex pastoral needs or who are from 'vulnerable groups'.

56. The ECM Group will maintain a risk register of vulnerable pupils who require sustained pastoral support. Pupils will be assessed against criteria for referral based on the Local Authority's 'continuum of need and response' and guidance related to extremism and radicalisation as part of the Prevent Agenda.

57. The risk register will place all pupils in the school into one of four categories:
    - **Category 0** – Pupils who have no discernible pastoral needs, or have needs which are met through general provision in the school. *This group will not be addressed by the ECM Group.*
    - **Category 1 – Universal**
      Pupils who have a discernible pastoral need, but there is a low risk and impact of harm to development. The needs and risks are met through universal services or single specific agency response. *The ECM group will briefly discuss provision for each pupil in this category, if practical to do so.*
    - **Category 2 – Some unmet needs and low risk**
      Pupils who have several or complex discernible needs, but there is a low risk and impact of harm to development. The needs and risks are met through universal services or a targeted service response. *The ECM Group will discuss, agree and review provision for each pupil in this category.*
    - **Category 3 – Higher Levels Of Unmet Needs and Medium Risk Children in Need (CIN) s.17 Children Act (1989)**
      Pupils who have several or complex discernible needs, and there are higher levels of unmet needs and a medium risk of harm to their development. Problems are sustained and persistent and have not been possible to resolve at the previous levels. The need requires a multi-agency approach and a referral to children's social care for a Statutory Single Assessment. *The ECM Group will discuss, agree and review provision for each pupil in this category.*
    - **Category 4 – Significant Unmet Needs and High Risk Child Protection (CP) and Looked After Children s.47 Children Act (1989)**
      Pupils who have a significant unmet needs and are most immediately vulnerable, where there is a substantial high risk and impact of harm to their development. The need requires urgent Child Protection and Safeguarding response through Children's Social Care. *The ECM Group will discuss, agree and review provision for each pupil in this category.*

58. Pupils who are named on the Attendance, Punctuality and Behaviour risk register that fall into categories 3 and 4 will also be discussed at the ECM group to agree and review interventions. The ECM Group will meet half-termly to agree and then review strategies for pupils placed in 3 and 4 and 2 if practical to do so.

Safeguarding information for pupils to build resilience, awareness and keep children safe

59. The School recognises that high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps all pupils, and especially those at risk of, or suffering from, abuse.

60. The School will therefore:

- establish and maintain an ethos where pupils feel secure and are encouraged to talk, and are listened to;
- ensure that pupils know that there are adults in the school who they can approach if they are worried or are in difficulty;
- ensure pupils are aware of the Safeguarding (Child Protection) Policy and the Designated Safeguarding Lead(s);
- provide a broad and balanced curriculum which promotes the spiritual, moral, cultural, mental and physical development of young people;
- include in the curriculum activities and opportunities for PSHE/Citizenship/RHE/RSHE which equip pupils with the skills they need to stay safe from abuse (including recognising and managing risk, resisting pressures, healthy relationships) and which will help them develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills;
- embed opportunities for children and young people to learn right from wrong, mix and share with children and value others' views, know about similarities and differences between themselves and others, and challenge negative attitudes and stereotypes;
- promote community cohesion through partnership work and community service activities;
- ensure it has appropriate online filters and monitoring systems in place;
- develop and deliver a curriculum to safeguard children online, all staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and children are at risk of abuse online as well as in day to day life which will In many cases take place concurrently via online channels and in daily life;
- implement systems to ensure children are safe from terrorist and extremist material when accessing the internet in school, including establishing appropriate levels of filtering;
- embed the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs in the School curriculum and all activities in and out of school;
- ensure that, wherever possible, every effort is made to establish effective working relationships with parents and colleagues from other agencies;
- make arrangements for consulting with and listening to pupils through the Pupil Council, displays and suggestion boxes to ensure children and young people have safe spaces to discuss sensitive topics including terrorism and extremist ideologies.

Safeguarding information for parents

61. The School will ensure the Safeguarding (Child Protection) Policy is available publicly via the School website and parents are aware of the fact that referrals about suspected abuse or neglect and vulnerability to radicalisation may be made and the role of the School in this.
62. Parents will be expected to support the School's ethos and the Safeguarding (Child Protection) Policy by demonstrating mutual respect and tolerance for all, promoting fundamental British values and rejecting all forms of discrimination and extremism.

Emergency contacts for children

63. Wherever possible, the school will hold more than one emergency contact number for their pupils. This goes beyond the legal minimum and is good practice to give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern (Keeping Children Safe in Education, DfE, 2020).

Safer recruitment

64. Star Academies will adhere to the guidance set out in *Keeping Children Safe in Education Part 3*, which states that "It is vital that schools and colleges create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children."
65. The Trust has a robust process and policy for Recruitment and Selection which highlights its commitment to safer recruitment and the *Childcare (Disqualification) Regulations 2009 and Childcare Act 2006.*

Use of school or college premises for non-school/college activities

66. Where governing bodies hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.
67. When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case.
68. The governing body or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate.
69. The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement (Keeping children safe in education, DFE, 2020)

Host families – homestay during exchange visits

70. The School has a responsibility for the safety and welfare of children during any exchange visit they arrange and for considering how best to minimise risk of harm to those children involved.

71. When arranging a homestay, the School will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay. In circumstances where the School arranges for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related, the responsible adults will be engaging in regulated activity for the period of the stay. In such cases and where the School has the power to terminate such a homestay the school would be the regulated activity provider.

72. A regulated activity provider commits a criminal offence if it knows, or has reason to believe that, an individual is barred by the Disclosure and Barring Service (DBS) from engaging in regulated activity but allows that individual to carry out any form of regulated activity. It should be noted that where the child's parent(s) or a pupil themselves arranges their own homestay, this would be a private arrangement therefore the school would not be the regulated activity provider.

73. Whilst there is no legal requirement for the School, as the regulated activity provider to check the barred list status of an adult who will provide homestay (in the circumstances described above), the School should obtain a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but will also allow the School to consider whether a criminal record information shown on the certificate would indicate the adult was an unsuitable host for a child.

74. It is not possible for the School to obtain criminality information from the DBS about adults who provide homestays abroad. The School will liaise with partner schools abroad, to establish a shared understanding of the arrangements in place both before and during the visit. The School will also satisfy themselves that these are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. The School is also free to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK *(Keeping Children Safe In Education, DfE, 2020).*

Support for those involved in a child protection issue

75. The School will support pupils, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (Designated Safeguarding Lead) who will keep all parties informed and be the central point of contact;
- nominating separate link people for the child and member of staff, where a member of staff is the subject of an allegation made by a pupil, to avoid any conflict of interest;
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in the School's whistleblowing, complaints and disciplinary procedures;

- cooperating fully with relevant statutory agencies;
- making sure a neutral interpreter is available when English is not the child's first language.

76. The School recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. This school may be the only stable, secure and predictable element in the lives of children at risk. Whilst at school, their behaviour may still be challenging and defiant and there may even be moves to consider suspension or exclusion from school.
77. The School will endeavour to support pupils through:
    - the curriculum, to encourage self-esteem and self-motivation;
    - the School ethos, which promotes a positive, supportive and secure environment and which gives all pupils and adults a sense of being respected and valued;
    - the implementation of behaviour management policies;
    - a consistent approach, which recognises and separates the cause of behaviour from that which the child displays. This is vital to ensure that all children are supported within the school setting;
    - regular liaison with other professionals and agencies who support the pupils and their families, in-line with appropriate confidentiality parameters;
    - a commitment to develop productive, supportive relationships with parents, whenever possible and so long as it is in the child's best interests to do so;
    - the development and support of a responsive and knowledgeable staff group trained to respond appropriately in child protection situations.

External speakers and charities

78. As outlined in the Trust's External Speakers and Charities Policy, external speakers and charities will be vetted to ensure pupils are not exposed to inappropriate political or controversial messages and charitable activity is free from harm and consistent with the values of the School.

Use of mobile phones and cameras

79. The following should be read alongside the Trust's **Photography and Video Recording Standard Operating Procedure**.
80. Children have their photographs taken to provide evidence of their achievements for developmental records (The Early Years Foundation Stage, EYFS 2014). Schools are not required to capture consent for this, as the lawful basis for taking photographs in order to provide evidence of achievements for developmental records would be classed as a public task under the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
81. In line with the Data Protection Act 2018, and the GDPR, for certain types of processing schools must seek parental consent to take photographs and use video recorders.
82. On admission, parents will be asked to sign their consent for photographs/video recordings to be taken in school and used for the purposes of promoting the school, and by extension Star Academies, in internal documents (e.g. staff newsletters), on school intranet sites, school websites, social media sites and in media articles. Parental consent is sought until the age of 13 when, in line with guidance regarding Data Protection, the consent of the child is sought. Consent will be valid for the full academic life of the child, unless the child's circumstances change in any way (e.g. parental responsibility is amended). If the child's

circumstances change additional consent forms will need to be completed. Photographs and video recordings can be used in accordance with the consent gained for a period of four years after the photograph/video was taken/recorded. This does not cover any other organisation and if any other organisation requests to take photographs of any child, then separate consent before photographs are taken will be sought.

83. For any Looked After Children (LAC) or children who are adopted the Designated Safeguarding Lead will liaise with the child's social worker, carer or adoptive parents to establish whether consent should be sought. Consideration will be given as to whether the identification of a LAC pupil, or children who are adopted, would risk their security in any way.

84. Consideration will be given to any children for whom child protection concerns have been raised. Should the Designated Safeguarding Lead believe that taking photographs or videos of any children would put their security at further risk, greater care will be taken towards protecting their identity.

85. Measures that can be agreed by the Designated Safeguarding Lead regarding LAC, children who are adopted, or children for whom child protection concerns are as follows:

- Photographs and videos can be taken as per usual procedures;
- Photographs and videos can be taken for educational purposes and official school use, e.g. on SIMS, but cannot be published online or in external media;
- No photographs and videos can be taken at any time or for any purpose.

86. Staff and volunteers are not permitted to use their own mobiles phones or cameras to take or record images of children. Pupils are not permitted to use their own mobile phones or cameras to take or record any images of children during session times.

87. The School's digital camera(s) or memory cards must not leave the school setting unless on an official school trip. Photographs will be printed/uploaded in the setting by staff and once done images will be immediately removed from the camera's memory. It is acknowledged that often photographs may contain other children in the background.

88. It is acknowledged that often photographs/video recordings may contain other children in the background, however, guidance should be sought from the Designated Safeguarding Lead regarding those photographs/video recordings that contain LAC, children who are adopted and children for whom there are child protection concerns in the background.

89. Cameras and mobile phones are prohibited in all toilet areas.

Using ICT

90. In using ICT in lessons, Schools must ensure:

- security software is installed on all PCs, laptops and the network to filter inappropriate internet sites:
- security software prevents access to social networking sites:
- anti-viral software is installed on all PCs, laptops and the network and renewed as required:
- the use of the internet is monitored using security software to ensure effective safeguarding within and beyond the School:
- all network access points are placed in a safe, adequately monitored area to prevent unauthorised access and physical tampering;
- all wireless access points are secured using administrative passwords.

91. In using ICT (laptops and PCs), all staff are expected to report indecent images found on a computer to a senior leader as soon as possible.

Induction

92. All new members of staff will undergo an induction that includes familiarisation with the School's Safeguarding (Child Protection) Policy and identification of their child protection training needs.
93. The Trust's Induction Policy outlines the procedures for the induction of new staff.
94. New staff will be inducted fully so that they are able to contribute towards safeguarding and promoting the welfare of pupils.
95. Induction includes ensuring new staff are:
    - aware of school systems and structures for supporting the wellbeing of pupils (including online safety);
    - provided with adequate training on safeguarding issues and policy including Safeguarding (Child Protection) Policy, Staff Code of Conduct, Behaviour Policy and the School's safeguarding response for children who go missing in education (Keeping Children Safe in Education, DfE, 2020);
    - introduced to the Designated Safeguarding Leads in school who have responsibility for safeguarding;
    - made aware of the early help process;
    - made aware of the process for making referrals.
96. All staff will sign to confirm they have received these documents and will adhere to the protocols set out.

Training

97. Designated Safeguarding Leads will be expected to participate in training every two years. This will focus on identifying abuse, local reporting arrangements and disseminating training to school staff.
98. All staff will participate in training on safeguarding on a regular basis and the School will ensure staff are aware of any safeguarding and child protection updates. The School will provide training to all existing staff at least once a year and all new staff during their induction (as outlined in the previous section). This training will focus on identifying and reporting abuse & neglect and safe working practices. Staff will be advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
99. Awareness of Prevent is delivered via home office prevent online training or the face to face Workshop to Raise the Awareness of Prevent (WRAP) delivered by the Local Authority. The training will provide staff with:
    - an awareness and understanding of the Prevent agenda and their role within it;
    - the ability to use existing expertise and professional judgement to recognise potentially vulnerable individuals who may be susceptible to messages of violence and radicalisation;
    - the confidence to use a common sense based response.
    - Staff will also be encouraged to undertake the 'Channel' general awareness online training module as a supplementary source of support.

100. As part of the safeguarding training, staff and volunteers will be given a copy of the Safeguarding (Child Protection) Policy, Staff Code of Conduct, Behaviour Policy and the School's safeguarding response for children who go missing in education (Keeping Children Safe in Education, DfE, 2020). All staff will sign to confirm they have received these documents and will and will adhere to the protocols set out (Appendix 5).
101. Supply staff and other visitors will be given the School's Visitor Guide, which outlines core safeguarding measures.
102. Governing bodies should also have regard to the Teachers' Standards, which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and requires teachers to have a clear understanding of the needs of all pupils, including those with mental health needs.
103. Governors, the Principal and senior leaders will undertake safer recruitment training. This will enable them to participate in the recruitment of staff.

Monitoring safeguarding arrangements

104. At the start of every academic year, senior leaders will scrutinise their safeguarding practice by completing a self-assessment of the safeguarding checklist (Appendix 4).
105. The validation of the checklist will be completed by the Trust's Safeguarding Leads in collaboration with the Designated Safeguarding Lead in School.
106. Following the validation of the checklist, a joint action plan will be compiled and where required, regular review dates will be agreed.
107. Safeguarding data will be collected every half term to inform the Safeguarding Dashboard which will be used as a mechanism of reporting safeguarding strengths and weaknesses to the Local Governing Body, Star Executive, Academic Board and the Board of Trustees.

Extended school, off-site arrangements and alternative providers

108. This policy is also applicable to all pupils undertaking extended service activities. Where extended school activities are provided by and managed by the School, our own Safeguarding (Child Protection) Policy and procedures apply.
109. If other organisations provide services or activities on our site, the School will check that they have appropriate procedures in place, including safer recruitment procedures.
110. When pupils attend off-site activities, the School will check that effective safeguarding and child protection arrangements are in place. This includes alternative provision and managed moves.
111. All organisations will be vetted to ensure pupils are not exposed to inappropriate political or controversial messages or activities.
112. Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil, and should be satisfied that the provider meets the needs of the pupil. The School should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff (Keeping Children Safe In Education, DfE, 2020).

Related school policies

113. The Safeguarding (Child Protection) Policy should be read in conjunction with the following policies:

- Anti-Bullying Policy
- Attendance and Punctuality Policy
- Behaviour Policy
- Complaints Policy
- Data Protection Policy
- Disciplinary Policy
- Equal Opportunities Policy
- Equalities Policy
- External Speakers and Charities Policy
- First Aid SOP
- Gifts and Hospitality Policy
- Health and Safety Policy
- Home School Agreement
- ICT Acceptable Use Policy
- Induction Policy
- Off Site Visits Policy
- Photography and Video Recording SOP
- Powers of Search Policy
- Personal, Social and Health Education Policy
- Pupil Emotional Health and Wellbeing Policy
- Recruitment and Selection Policy
- SEN – Information, Policy and Guidance Policy
- Relationship, Sex and Health Education Policy
- Social Media Policy
- Staff Code of Conduct Policy
- Supporting Pupils with Medical Conditions Policy
- Use of Reasonable Force Policy
- Whistleblowing Policy

Concerns about safeguarding practices

114. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime.

115. Where staff or volunteers wish to raise concerns, they should be raised with the School's management team under the Whistleblowing Policy.

116. Where a staff member feels unable to raise the issue with the School or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

117. The NSPCC also provide an alternative route for reporting concerns, staff can email help@nspcc.org.uk or call their helpline **0800 028 0285**.

Complaints

118. The Trust complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil.

Recognising abuse

119. Abuse is 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. A child may be abused in a family or institutional setting or community setting by those known to them, or more rarely by others. They may be abused by an adult or adults or another child or children.

120. Abuse can take many forms. Abuse, safeguarding issues and neglect are rarely standalone events that can be covered by one definition or label. Knowing what to look for is vital to the early identification of abuse and neglect. If a staff member is unsure, they must always speak to the Designated Safeguarding Lead.

Physical abuse:

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

- any injuries not consistent with the explanation given for them;
- injuries which occur to the body in places which are not normally exposed to falls or rough games;
- injuries which have not received medical attention;
- reluctance to change for, or participate in, games or swimming;
- bruises, bites, burns and fractures, for example, which do not have an accidental explanation;
- inconsistent accounts for the cause of injuries.

Emotional abuse:

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

- depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy;
- obsessions or phobias;
- sudden underachievement or lack of concentration;
- seeking adult attention and not mixing well with other children;

- sleep or speech disorders;
- negative statements about self;
- highly aggressive or cruel to others;
- extreme shyness or passivity;
- running away;
- stealing;
- lying.

Sexual abuse:

123. 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Possible signs of sexual abuse include:
    - the child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age;
    - sexual activity through words, play or drawing;
    - repeated urinary infections or unexplained stomach pains;
    - the child is sexually provocative or seductive with adults;
    - inappropriate bed-sharing arrangements at home;
    - severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations;
    - eating disorders such as anorexia or bulimia.

Neglect:

124. This 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Recognising extremism and radicalisation

125. Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on schools to have "due regard to the need to prevent people from being drawn into terrorism". 'Having due regard' means that schools should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

126. The following guidance provides examples of potential indicators for assessing an individual's vulnerability to being drawn in terrorism. The examples are not exhaustive and vulnerability may manifest itself in other ways; there is not simple profile. The guidance is written with regard to the Home Office guidance "Channel: Protecting Vulnerable People from Being Drawn into Terrorism" (2015) and "Channel: Vulnerability Assessment Framework" (2012).

Engagement:

127. Example needs, susceptibilities, motivations and contextual influences that make individuals vulnerable to engagement with an extremist group, cause or ideology include:

- feelings of grievance and injustice;
- feeling under threat;
- a need for identity, meaning and belonging;
- a desire for status;
- a desire for excitement and adventure;
- a need to dominate and control others;
- susceptibility to indoctrination;
- a desire for political or moral change;
- opportunistic involvement;
- family or friends' involvement in extremism;
- being at a transitional time of life;
- being influenced or controlled by a group;
- relevant mental health issues.

128. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- attempts to recruit others to the group/cause/ideology;
- communications with others that suggest identification with a group/cause/ideology.

Intent to cause harm:

129. Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- over-identification with a group or ideology;
- 'Them and Us' thinking;
- dehumanisation of the enemy;
- attitudes that justify offending;
- harmful means to an end;
- harmful objectives.

130. Example indicators that an individual has an intention to use violence or other illegal means include:
    - clearly identifying another group as threatening by what they stand for and blaming that group for all social or political ills;
    - using insulting or derogatory names or labels for another group;
    - speaking about the imminence of harm from the other group and the importance of action now;
    - expressing attitudes that justify offending on behalf of the group, cause or ideology;
    - condoning or supporting violence or harm towards others;
    - plotting or conspiring with others.

Capability to cause harm:

131. Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public. Example indicators that an individual is capable of directly or indirectly causing harm include:
    - having a history of violence;
    - being criminally versatile and using criminal networks to support extremist goals;
    - having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction);
    - having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

Guidance on specific types of abuse

Child sexual exploitation

132. Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (DfE, 2017).

133. Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

134. Possible signs of child exploitation include:
    - acquisition of money, clothes, mobile phones etc without plausible explanation;
    - gang-association and/or isolation from peers/social networks;
    - exclusion or unexplained absences from school;
    - leaving home/care without explanation and persistently going missing or returning late;
    - excessive receipt of texts/phone calls;
    - returning home under the influence of drugs/alcohol;
    - inappropriate sexualised behaviour for age/sexually transmitted infections;
    - evidence of/suspicions of physical or sexual assault;

- relationships with controlling or significantly older individuals or groups;
- multiple callers (unknown adults or peers);
- frequenting areas known for sex work;
- concerning use of internet or other social media;
- increasing secretiveness around behaviours; and
- self-harm or significant changes in emotional well-being.

135. All responses will pay regard to the DfE advice 'Child sexual exploitation - Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation'.

Female genital mutilation

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

137. The School is alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

138. Signs FGM may be imminent include:

- the possibility that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin;
- a professional may hear reference to FGM in conversation, for example a girl may tell other children about it;
- a girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman';
- a girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk;
- parents seeking to withdraw their children from learning about FGM.

139. There are a number of indications that a girl or woman has already been subjected to FGM:

- a girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable;
- a girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating;
- a girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- a girl or woman may have frequent urinary, menstrual or stomach problems;
- there may be prolonged or repeated absences from school or college;
- a prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- a girl or woman may be particularly reluctant to undergo normal medical examinations;
- a girl or woman may confide in a professional;
- a girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear;
- a girl may talk about pain or discomfort between her legs.

140. Where staff have a concern, the School will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

141. In line with Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), the School and its staff will fulfil the statutory duty to report to the Police where they discover (either through disclosure by the victim or visual evidence), that FGM appears to have been carried out on a girl under 18.

Forced marriage

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

143. All school staff need to be aware when reporting forced marriage that it is dealt with promptly. If the perpetrator becomes aware that the forced marriage is being investigated this can place the child at risk of being sent abroad immediately, disappearing and even murdered. Upon discovering and reporting a forced marriage, school staff should not liaise with the child's family, unless this has been agreed following the risk assessment from Police/Children's Social Care. When reporting, the school staff must report any siblings they are aware of within the household too, this includes males as siblings may also be at potential risk.

144. Possible indicators that a pupil may be at risk of forced marriage include:

- a child may appear anxious, depressed and emotionally withdrawn with low self-esteem;
- a child may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia;
- sometimes a child may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol;
- a child may present with a sudden decline in their performance, behaviour, engagement, aspirations or motivation;
- a child may discuss an upcoming family holiday that they are worried about;
- the child may have fears that they will be taken out of education and kept abroad;
- a decline in punctuality which may be the result of having to "negotiate" their way out of the house;
- a child may be withdrawn from school by those with parental responsibility, and not provided with suitable education at home;
- a child running away from home;
- no time allowed for extra-curricular activities;
- surveillance of the child by siblings or cousins;
- family history of older siblings leaving education early and marrying early;
- the child or other siblings within the family reported as missing;
- reports of Domestic Abuse, harassment or breaches of the peace at the family home;
- reports by the child of rape or kidnap;
- reports by the child of threats to kill, and attempts to kill or harm by the perpetrator.

Peer on peer abuse

145. Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the Trust's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

146. Peer on peer abuse can include: bulling, sexual bullying at school; being coerced to send sexual images; physical and sexual assaults and violence; child sexual exploitation and teenage relationship abuse. Gang-affected young women are particularly vulnerable to being sexually exploited for protection, status, drugs or money.

147. The Trust and the School takes peer on peer abuse seriously and all staff are clear that peer on peer abuse should not be passed off as "part of growing up" or "banter".

148. The School has put in place safeguards to reduce the likelihood of peer on peer allegations as outlined in this document and is alert to the indicators of abuse.

149. Incidents of peer on peer abuse will be dealt in line with the normal School safeguarding procedures.

150. In dealing with peer on peer abuse, the School recognises:

- that peer on peer abuse often occurs in the same school or neighbourhood, thus it is important any response takes account of how a network of peer relationships is affected;
- the relationship between sexual exploitation, serious youth violence, and teenage relationship abuse, and the need to ensure it is recognised when young people are experiencing multiple forms of abuse;
- that young people who have experienced abuse and exploitation can also be groomed to abuse their peers, requiring a much more holistic approach to safeguarding;
- that different gender issues can be prevalent;
- that peer on peer abuse can be influenced by the nature of the environments in which young people spend their time (e.g. exposure to violence on the streets, exposure to harmful social norms related to gender, relationships and consent);
- that peer on peer abuse hinges upon young people's experiences of power, and ultimately the notion of consent (while young people who abuse their peers have power over the young person they are harming, they may be simultaneously powerless in relation to some peers who are encouraging their behaviour or in the home where they are being abused).

151. The School also recognises that an alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Any decision on action in respect of the alleged perpetrator must be based on the risk they pose to other children and what can be done to minimise this risk. Assessment of an alleged perpetrator's needs will include consideration of:

- the nature, extent and context of the abusive behaviours;
- the young person's development and family and social circumstances;
- whether the young person appears to pose a continuing risk and, if so -
- who is likely to be at risk from him/her, and the nature and degree of the risk;
- the young person's need for services, both those which relate to his/her harmful behaviour and other significant needs;
- whether the young person is also at risk of significant harm and should be the subject of a child protection conference; and
- whether action is to be taken within the criminal justice system.

Peer on peer abuse: youth produced sexual imagery (sexting)

152. There is no clear definition of sexting, however, the school adopts the UK Council for Child Internet Safety definition and advice for dealing with 'youth produced sexual imagery' as set out in 'Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People'.

153. Youth produced sexual imagery includes incidents where:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;
- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

154. Youth produced sexual imagery does not include:

- the sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and schools should always inform the police;
- young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

155. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal:

- it is an offence to possess, distribute, show and make indecent images of children;
- the Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.
- The law criminalising indecent images of children was created long before mass adoption of the internet, mobiles and digital photography. Despite this, young people who share sexual imagery of themselves, or peers, are breaking the law.

156. Incidents of sexting will be dealt in line with the Trust's Safeguarding (Child Protection) procedures.

157. In responding to an incident or disclosure regarding youth produced sexual imagery, the School will aim to establish:

- whether there is an immediate risk to a young person or young people;
- if a referral should be made to the police and/or children's social care;
- if it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed;
- what further information is required to decide on the best response;
- whether the imagery has been shared widely and via what services and/or platforms - this may be unknown;
- whether immediate action should be taken to delete or remove images from devices or online services;
- any relevant facts about the young people involved which would influence risk assessment;
- if there is a need to contact another school, college, setting or individual;
- whether to contact parents or carers of the pupils involved - in most cases parents/carers should be involved, unless informing the parent/carer will put the young person at risk of harm.

158. An immediate referral to Police and/or Children's Social Care will be made if, at this initial stage:
    - the incident involves an adult;
    - there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
    - what the School knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
    - the imagery involves sexual acts and any pupil in the imagery is under 13;
    - the School has reason to believe a pupil or pupils are at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

159. If none of the above apply then the School may decide to respond to the incident without involving the Police and/or Children's Social Care (the School can choose to escalate the incident at any time if further information/concerns come to light).

160. The decision to respond to the incident without involving the Police and/or Children's Social Care will be made in cases when the Designated Safeguarding Lead and Principal are confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the School's pastoral support and disciplinary framework and if appropriate local network of support. For example, if a young person has shared imagery consensually, such as when in a romantic relationship, and there is no intended malice, it is usually appropriate for the School to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, will generally be referred to police and/or children's social care.

161. If at the initial review stage, a decision is made not to refer to Police and/or Children's Social Care, the Designated Safeguarding Lead will conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks. When assessing the risks the following will be considered:
    - Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
    - Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
    - Are there any adults involved in the sharing of imagery?
    - What is the impact on the pupils involved?
    - Do the pupils involved have additional vulnerabilities?
    - Does the young person understand consent?
    - Has the young person taken part in this kind of activity before?

162. Adults will not view youth produced imagery unless there is good and clear reason to. In making that decision, the School will need to be satisfied that viewing:
    - is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved);
    - is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report;
    - is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network.

163. If it is necessary to view the imagery, the School will:
    - never copy, print or share the imagery; this is illegal;
    - ensure viewing is undertaken by the Designated Safeguarding Lead or another member of the safeguarding team with delegated authority from the Principal;
    - ensure viewing takes place with another member of staff present in the room, ideally the Principal or a member of the senior leadership team. This staff member does not need to view the images;
    - wherever possible, ensure viewing takes place on school premises, ideally in the Principal or a member of the Senior Leadership Team's office;
    - ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery;
    - record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions.

164. If a decision is made to inform the Police and any devices need to be seized and passed to the Police, then the device(s) will be confiscated, turned off and placed under lock and key until retrieved by the Police.

165. If a decision is made that other agencies do not need to be involved, consideration will be given to deleting the imagery in line with the Trusts Powers of Search Policy and the DfE guidance 'Searching, Screening and Confiscation' which advises that schools have the power to search pupils devices, search data on devices and delete youth produced sexual imagery. The School will not search devices and delete imagery unless there is good and clear reason to do so. The pupil should be asked to delete the imagery and confirm deletion.

166. In line with the school's general safeguarding procedures, all decisions and actions, including dates and times and reasoning will be logged.

Peer on peer abuse: sexual violence and sexual harassment between children in schools and colleges

167. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

168. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, pupils and school staff are supported and protected as appropriate.

169. Staff should be aware of the importance of:
    - making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
    - not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours has the potential to normalise them.

170. It is important to understand that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language.
171. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed.
172. As with all safeguarding concerns, it is important that in such instances staff take appropriate action in accordance with the Safeguarding (Child Protection) Policy. Staff should not assume that someone else is responding to any incident or concern. If in any doubt, staff should speak to the Designated Safeguarding Lead (or a deputy). In such cases, the basic safeguarding principles remain the same, but it is important for the school to understand why the victim has chosen not to make a report themselves. This discussion should be handled sensitively and with the support of Children's Social Care if required.
173. There may be reports where the alleged sexual violence or sexual harassment involves pupils from the same school but is alleged to have taken place away from the school premises, or online. There may also be reports where the children concerned attend two or more different schools. The safeguarding principles, and individual school's duties to safeguard and promote the welfare of pupils, remain the same. In such circumstances, appropriate information sharing and effective multi-agency working will be especially important (Sexual violence and sexual harassment between children in schools and colleges, DfE, 2019).

Faith abuse

174. Faith abuse is the belief in concepts of witchcraft and spirit possession, demons or the devil acting through children.
175. In working to identify such child abuse it is important to remember every child is different. Some children may display a combination of indicators of abuse whilst others will attempt to conceal them. There are a range of common features across identified cases. These indicators of abuse, which may also be common features in other kinds of abuse, include:

- a child's body showing signs or marks, such as bruises or burns, from physical abuse;
- a child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other children;
- a child's personal care deteriorating, for example through a loss of weight, being hungry, turning up to school without food or lunch money, or being unkempt with dirty clothes and even faeces smeared on to them;
- it may be directly evident that the child's parent or carer does not show concern for or have a close bond with the child;
- a child's attendance at school becoming irregular or the child being taken out of school altogether without another school place having been organised, or a deterioration in a child's performance at school;
- a child reporting that they are or have been accused of being 'evil' and/or that they are having the 'devil beaten out of them'.

176. All staff should be alert to the indicators above and should be able to identify children at risk of this type of abuse and intervene to prevent it.

Fabricated illness

177. Fabricated or induced illness (FII) is a form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).

178. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This ranges from extreme neglect (failing to seek medical care) to induced illness. Behaviours in FII include a parent or carer who:

- persuades healthcare professionals that their child is ill when they are perfectly healthy;
- exaggerates or lies about their child's symptoms;
- manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples to suggest the child has diabetes;
- deliberately induces symptoms of illness – for example, by poisoning her/his child with unnecessary medication or other substances.

Child criminal exploitation: serious violence/county lines

179. Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of serious violence and county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

180. Key to identifying potential involvement in serious violence/county lines are missing episodes in education, a change in friendships or relationships with older individuals or groups, significant decline in performance, signs of self-harm or significant change in wellbeing, signs of assault or unexplained injuries, drug or alcohol misuse, missing for periods of time or regularly home late. Unexplained gifts or new possessions are also indicators of children being involved with individuals associated with criminal networks or gangs.

181. When the victim may have been trafficked for the purpose of transporting drugs, like other forms of abuse and exploitation, county lines exploitation can affect:

- any child or young person (male or female) under the age of 18 years, even if the activity appears consensual. The perpetrators may well be part of a group; single/mixed sexed;
- any vulnerable adult over the age of 18 years.

182. Child Exploitation is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources (Keeping Children Safe in Education, DfE 2020).

So-called 'honour-based' abuse

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

184. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.
185. If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care (Keeping Children Safe in Education, DfE, 2020).

Homelessness

186. Being homeless or being at risk of homeless presents a real risk to a child's welfare. Indicators that a family may be a risk of becoming homeless include household debt, rent arrears and domestic abuse .along with the child being withdrawn and maybe showing signs of physical neglect.

Upskirting

187. Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.
188. A "specified purpose" is namely:
    - Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
    - To humiliate, distress or alarm the victim.
189. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.
190. Upskirting will not be tolerated by the Trust or any of its Establishments.
191. Any incidents of upskirting will be reported to the Designated Safeguarding Lead who will then decide on the next steps to take, which may include police involvement.

Online risks

192. The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school to protect and educate the whole school or community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

What is online abuse?

193. Online abuse is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including:
    - social media;
    - text messages and messaging apps;
    - emails;
    - online chats;
    - online gaming;

- live-streaming sites.

194. Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse might only happen online.

Signs of online abuse

195. A child or young person experiencing abuse online might:

- spend a lot more or a lot less time than usual online, texting, gaming or using social media;
- seem distant, upset or angry after using the internet or texting;
- be secretive about who they're talking to and what they're doing online or on their mobile phone;
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

196. Some of the signs of online abuse are similar to other abuse types:

- cyberbullying;
- grooming;
- sexual abuse;
- child sexual exploitation.

Further information of specific safeguarding issues

197. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. The NSPCC offers information for schools on its website www.nspcc.org.uk. Broad government guidance on the issues listed below can also be accessed via the www.gov.uk website:

- child missing from home or care
- child sexual exploitation (CSE)
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults strategy
- private fostering
- preventing radicalisation
- PREVENT for schools
- sexting (CEOP)
- sexting in Schools and Colleges
- teenage relationship abuse
- trafficking

- use of social media for online radicalisation

Recognising children who may be particularly vulnerable

198. Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

Children who are looked after

199. The most common reason for children becoming looked after is as a result of abuse and/or neglect. The school will ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

200. In particular, the school will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. The school also collates information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's Social Worker and the name of the Virtual School Head in the authority that looks after the child.

201. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group

202. The school will appoint a designated teacher who will work with local authorities to promote the educational achievement of registered pupils who are looked after (the Designated Safeguarding Lead). Under sections 4 to 6 of the Children and Social Work Act 2017, designated teachers also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher must have appropriate training and the relevant qualifications and experience (Keeping Children Safe In Education, DfE 2020).

Children with special educational needs and disabilities

203. Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

204. To address these additional challenges, schools should consider extra pastoral support for children with SEN and disabilities.

205. When applying disciplinary measures such as restraint or isolation in response to incidents involving children with SEN and disabilities, schools should consider the risks carefully, given the additional vulnerability of the group. However, to safeguard a pupil and others, it may be necessary to use restraint.

206. By planning positive and proactive behaviour support, schools can reduce the occurrence of risky behaviour and the need to use restraint (Keeping Children Safe in Education, DfE, 2020).

Other considerations

207. In addition to the above, to ensure that all our pupils receive appropriate protection, the school will give special consideration to children who are:

- living in a domestically abusive situation;
- affected by parental substance misuse;
- asylum seekers;
- regularly absent from school;
- attending alternative provision or subject to a managed move;
- living away from home (frequent movers);
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation; for example, living in hotel/hostel accommodation;
- living a transient lifestyle;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- speakers of another first language;
- subject to a Child Protection Plan;
- subject to a Child in Need Plan
- vulnerable to messages of violence and extreme ideologies;
- young carers of parents with a mental health condition;
- part of a family living with financial hardship.

Children missing from education

208. A child going missing from education is a potential indicator of abuse or neglect.

209. The School will ensure its procedures for dealing with children who go missing from education, particularly on repeat occasions, are rigorously implemented to help identify the risk of abuse and neglect and to help prevent the risks of their going missing in the future. The **Pupils Who Go Missing During the School Day SOP** must be used.

210. The School will inform the Local Authority of any pupils who are failing to attend school regularly or going to be deleted from the admission register under all fifteen grounds for deletion. This will be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. The School will record details of the pupil's residence, the name of the person with whom they will reside, the date from which they will reside there, and the destination school (where this can reasonably be obtained). The School will inform the Local Authority of the pupil's destination school and home address.

211. The School will inform the Local Authority of any pupil who fails to attend school, at such intervals as are agreed between the School and the Local Authority (or in default of such agreement, at intervals determined by the Secretary of State).
212. The School will work collaboratively with the Local Authority to make reasonable enquiries about a pupil's whereabouts where there is a continuous absence after a grant of leave.
213. The School will inform the Local Authority when registering new pupils within five days, including the pupil's address and previous school (where this can reasonably be obtained).
214. The School will cooperate with the Local Authority on the provision of the above information for pupils leaving or joining the school at standard transition points.

Dealing with safeguarding concerns and incidents[2]

Responding to a disclosure

215. If a child reports that they are being abused and neglected, staff should listen to them, take their allegation seriously, and reassure them that action will be taken to keep them safe.
216. It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.
217. If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the pupil know that they must pass the information on – staff are not allowed to keep secrets. The point at which they tell the pupil this is a matter of professional judgement. If they jump in immediately, the pupil may think that they do not want to listen. If left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.
218. During their conversations with the pupils, staff will:
    - allow them to speak freely; listening carefully and uncritically;
    - endeavour to utilise a neutral translator if necessary;
    - remain calm and collected – the pupil may stop talking if they feel they are upsetting their listener;
    - give reassuring nods or words of comfort and reassure the pupil that they are right to tell – 'I'm sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
    - not be afraid of silences – staff must remember how hard this must be for the pupil;
    - consider their own body language and the messages it may send a child regarding the nature of the disclosure;
    - under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think;
    - tell the pupil that in order to help them, the member of staff must pass the information on;
    - not automatically offer any physical touch as comfort - it may be anything but comfort to a child who has been abused;

[2] Where schools are using an online safeguarding management system, they are required to ensure that all records required in this section are produced using the recording proformas and templates of the system.

- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be interpreted by the child to mean that they have done something wrong;
- tell the pupil what will happen next - the pupil may agree to go to see the Designated Safeguarding Lead otherwise it is the duty of the member of staff to inform the Designated Safeguarding Lead of what has been discussed (if the pupil does agree to go and see the Designated Safeguarding Lead, the staff member should inform the Designated Safeguarding Lead that the child will be coming to see them at some point).

219. Following the conversation the staff will report the disclosure as outlined in the Reporting safeguarding concerns section taking precaution to report to the Designated Safeguarding Lead even if the child has promised to do it by themselves and following up with a written record. Staff should seek support if they feel distressed.

Responding to a concern that a child is at risk

220. There will be occasions when, in the absence of a disclosure, staff may suspect that a pupil may be at risk, but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre or concerning, pupils might write stories or poetry that reveal confusion, distress or extreme beliefs, or physical but inconclusive signs may have been noticed. In these circumstances, staff will give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

221. Staff should report their concerns as outlined in Reporting safeguarding concerns section.

Reporting safeguarding concerns

222. Recording procedures will be fully explained to all staff to ensure concerns are reported quickly and records are as concise and unambiguous as possible.

223. All concerns, suspicions and disclosures should be recorded using the school's online safeguarding management system. For supply staff, volunteers or visitors to school, the School's Safeguarding Concern Form (see Appendix 6) should be used to report concerns. Blank copies of the Safeguarding Concern Form should be kept in the main office and staffroom for access when necessary.

224. Staff should immediately report:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play;
- any explanation given which appears inconsistent or suspicious;
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. significant changes in behaviour, worrying drawings or play);
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- any concerns that a child is presenting signs or symptoms of abuse or neglect;
- any significant changes in a child's presentation, including nonattendance;
- any hint or disclosure of abuse or neglect received from the child, or from any other person, including disclosures of abuse or neglect perpetrated by adults outside of the family or by other children or young people;

- any concerns regarding person(s) who may pose a risk to children (e.g. staff in school or a person living in a household with children present) including inappropriate behaviour e.g. inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images;
- any discovery that FGM appears to have taken place on a girl under 18 years;
- any expressions of extremist ideologies that suggest vulnerability to radicalisation.

225. Where no disclosure has been made, but a member of staff has concerns regarding the welfare or well-being of a pupil, staff should raise a concern on the online safeguarding management system. Supply staff, volunteers and visitors to the school should make a written account of such concerns using Part 1 of the Safeguarding Concern Form and Part 3 if applicable (Appendix 6).
226. Where a disclosure has been made, a written factual account record, using the child's own words, should be recorded on the safeguarding management system. Supply staff, volunteers and visitors to the school who do not have access to the safeguarding management system should do this by completing Part 1 and Part 2 of the Safeguarding Concern Form (and Part 3 if applicable).
227. When logging a concern, professional opinion may be expressed, but should be supported by stating the facts with observations upon which the opinion is based (e.g. Adam appeared angry as he was kicking the table and swearing). All notes should differentiate clearly between fact, opinion, interpretation, observation, and/or allegation.
228. All written concerns should be logged on the online system as soon as possible and in any case within 24hrs. In the case of supply staff, volunteers and visitors to the school, written forms should be passed to the Designated Safeguarding Lead as soon as is possible, and in any case within 24hrs. In some cases it may be necessary to pass on concerns verbally and follow them up in writing soon after. In the absence of this person, the Deputy Designated Safeguarding Lead should be approached.
229. Any written records should be dated and signed with the name of the signatory clearly printed. Any handwritten notes made immediately after the event can act as evidence of them being written at the time in any future court case. Therefore these should not be destroyed if the details are recorded more formally, but instead kept securely attached to the Safeguarding Concern Form. All written notes should either be kept in the pupil safeguarding file and referenced on the online database or uploaded on to the system.
230. Staff will follow the reporting procedures outlined in this standard operating procedure. However, anybody can make a direct referral. They may share information directly with Children's Social Care, Police or the NSPCC if:
    - the situation is an emergency and the Designated Safeguarding Lead, their deputy, the Principal and the Chair of Governors are all unavailable;
    - they are convinced that a direct report is the only way to ensure the pupil's safety.
231. Key points for staff to remember for taking action are:
    - report the concern to the Designated Safeguarding Lead as soon as is possible, within 24hrs at the latest;
    - in an emergency, take the action necessary to help and protect the child, for example, call 999;
    - not to start their own investigation;
    - share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;

- complete the Safeguarding Concern Form;
- seek support if distressed.

Responding to safeguarding concerns

232. A concern raised may not progress any further than a discussion with the Designated Safeguarding Lead. A record of the discussion and any initial action taken will be documented on the safeguarding management system.

233. When dealing with a case, the Designated Safeguarding Lead will consider:

- Am I dealing with 'risk' or 'need'? (by definition, a child at risk is also a child in need. However, what is the priority/level and immediacy of risk/need?)
- Can the level of need identified be met:
- in or by the school or by accessing universal services without referral to Children's Social Care or other targeted services?
- by working with the child, parents and colleagues?
- What resources are available to me/the School and what are their limitations?
- Is the level of need such that a referral needs to be made to Children's Social Care which requests that an assessment of need be undertaken?
- Is the level and/or likelihood of risk such that a child protection referral needs to be made (i.e. a child is suffering or is likely to suffer significant harm?)
- What information is available to me: child, parents, family and environment?
- What information is inaccessible and potentially, how significant might this be?
- Who do I/don't I need to speak to now and what do they need to know?
- Where can I access appropriate advice and/or support?
- If I am not going to refer, then what action am I going to take?

234. The Designated Safeguarding Lead will make a referral to Children's Social Care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

235. In making this decision, the Designated Safeguarding Lead will consider the Safeguarding Partners' threshold document and framework for action that includes:

- the process for the early help assessment and the type and level of early help services to be provided;
- the criteria, including the level of need, for when a case should be referred to Local Authority Children's Social Care for assessment and for statutory services.

236. Where a Designated Safeguarding Lead or Deputy Designated Safeguarding Lead considers that a referral to Children's Social Care may be required, they must consider:

- Is this a Child In Need? - Under section 17 (s.17 (10)) of the Children Act 1989, a child is 'in need' if:
  - the child is unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority;
  - the child's health or development is likely to be impaired, or further impaired, without the provision of such services;
  - the child is disabled

- Is this a Child Protection Matter? - Under section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are informed that a child who lives or is found in their area:
  - is the subject of an Emergency Protection Order;
  - is in Police Protection;
  - or where they have reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

237. Therefore it is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under s.47 must therefore provide information which clearly outlines that a child is suffering or is likely to suffer significant harm. The Designated Safeguarding Lead will make judgements around 'significant harm', levels of 'need and risk' and when to refer.
238. Once a referral has been made, Children's Social Care should respond within one working day indicating what further action they have decided to take. This may include further assessment of the child either through an early help assessment, through a Child In Need Assessment (section 17 Children Act 1989) or a Child Protection Enquiry (section 47 Children Act 1989). The School will participate in Strategy Discussions and Child Protection Conferences as required.
239. Referrals regarding extremism will be made to Children's Social Care. In line with government advice, a Channel Co-ordinator/Police Practitioner will be fully embedded in the safeguarding arrangements of Children's Social Care if required. Where assessment does not indicate a genuine vulnerability to being drawn into terrorism, a case will be signposted to other more appropriate support services following consultation with the LADO.

Allegations against members of staff

240. If anyone makes an allegation that any member of staff (including supply staff, volunteer or governor) may have:
  - behaved in a way that has harmed a child, or may have harmed a child;
  - possibly committed a criminal offence against or related to a child; or
  - behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children (including the promotion of extreme ideologies).

241. The allegation will be dealt with in accordance with national guidance and agreements, as implemented by the Safeguarding Partners.
242. The flowchart in Appendix 8 outlines the steps for schools when dealing with an allegation against a member of staff.
243. The Principal, rather than the Designated Safeguarding Lead, will handle such allegations as Case Manager, unless the allegation is against the Principal, in which case the Chief Executive of the Trust or an appropriate person nominated by the Chief Executive of the Trust will act as Case Manager and handle the School's response.
244. In all instances, the Case Manager will have no role in the investigation at the onset of the allegation and the Principal and/or Chief Executive of the Trust must discuss the allegation with the Local Authority Designated Officer. The full procedures for dealing with allegations against staff can be found in the Safeguarding Partners Policy on allegations against staff.

245. The Trust HR team will be informed as soon as the School becomes aware of any allegation against a staff member and the investigation process should not commence until advice has been taken.
246. Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know. However, there will be some cases that require a strategy discussion with Children's Social Care and/or the Police and it will be within the strategy discussion that decisions are made as to what information can be disclosed to parents or carers.
247. In the event of an allegation being made, the School will make every effort to maintain confidentiality and guard against unwanted publicity. Parents and carers will be made aware that under s141F of the Education Act 2011, there is a prohibition on reporting or publishing allegations about teachers, this includes via social media e.g. Facebook, Twitter etc and if breached this could lead to prosecution. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be advised to seek legal advice.
248. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.
249. Where a risk assessment is required, the Trust HR team will support the school with the completion of Appendix 7.
250. The School will make a referral to the Disclosure and Barring Service (DBS) if any member of staff is disciplined, dismissed, is currently under investigation or leaves prior to the end of an investigation for causing emotional, psychological, physical or sexual harm, neglect or risk of harm to children.

Record keeping

251. A Child Protection File will be started for an individual child as soon as the School is aware of any child protection concerns about them. This may arise in a number of ways:
    - if a member of staff raises a concern about the welfare or well-being of a pupil (this should be recorded on the safeguarding management system or, in the case of supply staff, volunteers and visitors to the school, in writing using Appendix 6 Part 1 (and 3 if applicable));
    - if a child makes a disclosure (this should be recorded on the safeguarding management system or, in the case of supply staff, volunteers and visitors to the school, in writing using Appendix 6 Part 1 and 2 (and 3 if applicable));
    - if information is passed to the School by a previous school attended by the pupil;
    - if the school is alerted by another agency (e.g. Police, health or social care) of child protection concerns about that child.
252. The Child Protection File will have a front sheet (see Appendix 9) on the file which records the child's full name, date of birth, address and information about family members.
253. Separate files will be kept for individual siblings, cross referencing to other children in the family. Relevant, and as necessary, redacted information will be copied and placed on each individual sibling's file.
254. If more than one file exists in relation to an individual child, this will be indicated on each file. Each file will be numbered and dated (e.g. January 2015, Vol. 1 of 3).

255. If information is removed from the file for any reason, a record should be made indicating the reason for such removal, where the information has gone, when it was removed and who removed it (see Appendix 10). The Designated Safeguarding Lead will be notified of the removal of any information from a file.

256. The Child Protection File will contain:

- A Child Protection File front sheet (see Appendix 9)
- a detailed chronology, updated on a regular basis, at the front of the file (see Appendix 11);
- any concerns raised by staff;
- all safeguarding/concern reports, notes and correspondence referring to the child;
- copies of any referrals;
- any child protection information received from previous schools or other agencies;
- notes/minutes of any Child Protection Conferences etc;
- record of any instances where information has been removed from the file.

257. The School will record in SIMS whether the child is subject to a Child Protection Plan or if they are a Child in Care.

258. The Child Protection File will also cross-reference other relevant records held in school (e.g. relating to the Common Assessment Framework (CAF)/Early Help Assessment (EHA), early support, Special Educational Need).

259. All records of child protection concerns, disclosures or allegations will be treated as sensitive information and kept together. Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. All staff who may need to consult a child's school file will be made aware of what the symbol means, and who to consult if they see this symbol. The information will be shared with those who need to have it.

260. All Child Protection Files will be kept together in a secure place. The filing system will be accessed via the Designated Safeguarding Lead. Any electronic information will be password protected and only made available to relevant individuals.

261. Child protection information will be stored and handled in line with Data Protection Act 1998 principles such that information is:

- processed for limited purposes;
- adequate, relevant and not excessive;
- accurate;
- kept no longer than necessary;
- processed in accordance with the data subject's rights;
- secure.

262. Every effort will be made to prevent unauthorised access, and sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage.

263. In relation to Safeguarding, GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Information can be shared without consent if not doing so would place a child at risk. For further information regarding this please see the Trust's Data Protection Policy.

Record transfers

264. It is imperative that relevant child protection information is forwarded to the new/receiving establishment by the establishment that the subject child is departing and that this happens as quickly as possible.
265. Such information sharing should occur between Designated Safeguarding Leads and/or Principal as soon as possible and, in any event, within 5 days of the child's departure.
266. When a file is to be transferred, a 'Record of Child Protection File Transfer' should be completed and attached to the Child Protection File (see Appendix 12).
267. It is inappropriate to simply forward all relevant documentation as this leaves the former school with no record. Rather:
    - where feasible, Designated Safeguarding Leads from former and receiving schools should arrange to meet and share relevant information, with copies of relevant and appropriate documentation being provided; or
    - alternatively, telephone discussions should take place followed-up with appropriate summaries / chronologies and copies of key records.
268. The new school/college should be provided with the **ORIGINAL** documentation.
269. Where a parent elects for Home Education, the child is from a traveller, migrant or Romany family, and/or where the receiving school's identity is not known, the Designated Safeguarding Lead at the former school should contact Children's Social Care for advice.

Access to child protection files

270. The safety and welfare of a child must always be considered when making decisions whether to share confidential information.
271. A child who has a Child Protection File has the right to access their personal record. This is known as the right of subject access under the Data Protection Act 2018. Parents (i.e. those with parental responsibility in law) may exercise the right of subject access on behalf of their child if they are unable to act on their own behalf or give their permission. As a general guide, a child of 13 or older is expected to be mature enough to make this kind of request independently or provide permission.
272. Access to the information on file should be on a need-to-know basis among the staff. This can only be decided on a case-by-case basis. The confidentiality of the child and family should be respected as far as possible, but the welfare of the child is paramount. It would be unlikely that every member of staff needs to know the details of a case. Generally speaking, the closer the day-to-day contact with the child, the more likely the need to know an outline of the case. Essentially, if someone receives information in his/her professional capacity and the person giving that information believes it will be treated securely, and that belief is reasonable, then the recipient of the information will be under a duty to treat it securely.

External Bodies

273. When staff have information they feel needs to be shared within the school or with an external agency such as the Police, they should seek advice from the Designated Safeguarding Lead. The Designated Safeguarding Lead may consult the LADO.

274. In the majority of cases, schools will be able to share personal information using the lawful basis of public task (personal data) and substantial public interest (special category data). There may be circumstances were the child and family's consent to sharing should be sought. If consent has been withheld, this must be recorded, including the reason given for withholding consent. Exceptions to the requirement to gain consent are that if seeking such consent could:
    - increase the risk of harm to the child or someone else;
    - undermine the prevention, detection or prosecution of a serious crime (a crime that causes or is likely to cause significant harm to a child, young person or adult);
    - interfere with any potential investigation.

275. The names of any other children, other than the pupil who is the subject of the record, should be removed when disclosing records, unless consent is obtained from the individual(s) concerned (or their parent/carer on their behalf). Care should be taken to ensure all identifying information is removed from the copy of the record to be shared.

276. Child protection information should not ordinarily be shared with agencies other than statutory agencies such as the Police (e.g. information should not be released to solicitors etc). Where such a request is made, advice should be sought from the Star Central Regulatory Team.

277. If there is a Police request for the Child Protection information, please ensure that the requesting officers provide a Data Request Form. This form will show the information the police are requesting, who the request relates to, why the police are requesting the information, and the exemption they are relying on to process the information. The school should securely retain a copy of this form.

278. Conversations between designated personnel at different schools (e.g. sharing concerns or asking for information about sibling groups) are perfectly acceptable under the lawful bases of public task and substantial public interest. As mentioned in point 54 there may be occasions when consent is the most appropriate lawful basis, where possible consent should be sought from parents before such a conversation takes place. Any relevant child protection information coming to light should be carefully logged.

Retention of child protection files

279. According to current guidance from the Records Management Society's Schools Retention Schedule, records must be kept (securely) until the subject's 25th birthday, after which they should be shredded (Child Protection records relating to Children's Social Care involvement will be retained for much longer than this by the Local Authority in any event).

280. The Data Protection Act requires that schools, or other bodies that keep information, maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:
    - file reference (or other unique identifier);
    - file title (or brief description);
    - number of files (and date range);
    - the name of the authorising officer;
    - date action taken.

281. This must be kept in the Establishment Record of Destruction form.

Appendix 1: Designated Safeguarding Lead responsibilities

The broad areas of responsibility for the Designated Safeguarding Lead are:

Manage referrals

The Designated Safeguarding Lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the Police as required;
- where appropriate, take the lead in relation to Early Help support.

Work with others

- Liaise with the Principal to inform him or her of issues, especially ongoing enquiries under section 47/17of the Children Act 1989 and policeinvestigations;
- As required, liaise with the "case manager" (as per Part Four of KCSIE 2019) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- Liaise with staff (especially pastoral support staff, school nurses, IT Technicians and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- Act as a source of support, advice and expertise for staff.

Undertake training

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal Designated Safeguarding Lead or Person training, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the Trust's Safeguarding (Child Protection) Policy and procedures, especially new and part time staff;

- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure records of concerns and referrals;
- understand and support the establishment with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with special education needs (SEN) and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Trust may put in place to protect them.

Raise Awareness

- The Designated Safeguarding Lead should ensure the Trust's Safeguarding (Child Protection) Policy are known, understood and used appropriately;
- Ensure the Trust's Safeguarding (Child Protection) Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this;
- Ensure the Safeguarding (Child Protection) Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Trust in this; and
- Link with the local Safeguarding Partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- The DSL is responsible for promoting educational outcomes of children with a social worker. The DSL will ensure staff know who these children are, understand their academic progress and attainment data and maintain a culture of high aspirations for this cohort.

Child protection file

- Where children leave the establishment ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required;
- In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

- During term time the Designated Safeguarding Lead (or a deputy) should always be available (during school hours) for staff in the establishment to discuss any safeguarding concerns. Whilst the Designated Safeguarding Lead (or deputy) would be expected to be available in person, it is a matter for individual establishment, working with the Designated Safeguarding Lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such mediums is acceptable.
- It is a matter for individual establishments and the Designated Safeguarding Lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Appendix 2: Designated Looked After Children (LAC) Teacher responsibilities

The broad areas of responsibility for the Designated LAC Teacher are:

General

The Designated LAC Teacher is expected to:

- take lead responsibility for LAC at the school, ensuring that their personal, emotional and academic needs are prioritised by providing strategic leadership across the school;
- act as the central point of contact for LAC in the school, ensuring the school has appropriate arrangements in place to support pupils and minimise any disruption to learning;
- work with virtual school heads (VSHs) to promote the education of LAC, ensuring a whole-school culture where the personalised learning needs of every looked-after child matters;
- take lead responsibility for ensuring school staff understand the ways in which LAC's learning may be affected and how the school supports the educational achievement of these pupils;
- take lead responsibility for the development and implementation of LAC's personal education plans (PEPs) in partnership with others;
- ensure that any safeguarding concerns regarding LAC are quickly and effectively responded to;
- liaise with the SENCo to identify and support the SEND needs of LAC, and understand how to access further assessment and support where necessary;
- respond appropriately to disclosures or concerns relating to the wellbeing of a LAC pupil;
- keep detailed, accurate and secure records of arrangements, and any concerns, for LAC;
- monitor LAC pupils at risk of harm or those that have been subjected to harm, providing support and ensuring their welfare;
- contribute to the development and review of whole-school policies and procedures in relation to LAC.

Fostering a culture of inclusivity

Promoting a culture in which looked-after and previously looked-after children:

- can discuss their progress and be involved in setting their own targets, have their views taken seriously, and are supported to take responsibility for their own learning;
- are prioritised in any selection of pupils who would benefit from one-to-one tuition, and that they have access to academic focused study support;
- are encouraged to participate in school activities and in decision making within the school and the care system;
- believe they can succeed and aspire to further and higher education or highly skilled jobs;
- can discuss difficult issues (such as SEN, bullying, attendance) in a frank manner with a sympathetic and empathetic adult.

Personal Education Plans

- Work closely with other teachers to assess pupils' educational needs and ensure PEPs are created without delay;
- Ensure that PEPs are effective in supporting everyone to help the looked-after child to make good educational progress;
- Discuss with the pupil the best way for them to make progress and involve any relevant teachers in the discussion to arrange effective provision across the whole curriculum;

- Take responsibility for reviewing PEPs before the statutory review, ensuring they are up-to-date and contain any new information, including whether agreed provision is being delivered;
- Ensure PEPs are clear about what has or has not been taken forward, noting what resources may be required to further support the pupil and how these resources may be secured;
- In respect of pupils with SEND, ensure that their PEPs work parallel to their education, health and care (EHC) plan.

Liaison

- Work with services internally and externally to provide the required support for all Looked After Children. For example, intervention worker within school, Looked After Children's Educational Services (LACES), virtual school heads (VSHs) and Police etc;
- Contribute towards raising parents' awareness of the pupil premium plus and other support for LAC and encourage their involvement in deciding how the funding is used to support their child.
- Working directly with looked-after and previously looked-after children and their carers, parents or guardians to:
    - promote good home-school links;
    - support progress by paying particular attention to effective communication with carers, parents or guardians;
    - ensure carers, parents or guardians understand the potential value of one-to-one tuition and are equipped to engage with it at home;
    - ensure carers, parents or guardians are aware of how the school teaches key skills such as reading and numeracy; and
    - encourage high aspirations and working with the child to plan for their future success and fulfilment.

Being a source of advice for teachers

- Take lead responsibility for ensuring all staff members have strong awareness, training and skills relating to the specific needs of LAC and how to support them, e.g. with regards to attendance, homework and behaviour;
- Ensure all staff members have high expectations of LAC's learning and set targets to promote educational progress;
- Promote attachment and trauma awareness between staff members, ensuring they are aware of the emotional, psychological and social effects of loss and separation from birth families and how this impacts pupils' behaviour;
- Ensure all staff members understand the importance of viewing LAC as individual pupils rather than a group of pupils, and that they are treated equally;
- Ensure staff members are aware of the training opportunities that are available to them;
- Maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals;
- Represent the school at meetings of designated leads and circulate the outcomes to staff members;
- Ensure staff members receive frequent updates regarding particularly vulnerable LAC;
- Work with other institutions to ensure that the pupil's transition to the next stage in their education is as smooth as possible, confirming that any other appropriate institutes have all the necessary documents;

- Where necessary, securely transfer pupil's personal files, as well as those containing child protection issues, to other educational establishments, ensuring that confirmation of receipt is obtained.

Appendix 3: Safe working practices

Propriety and behaviour

All staff are expected to:

- set high expectations and challenging targets for all pupils;
- promote fundamental British values, including democracy, the rule of law, freedom of religion, individual liberty, freedom of speech, freedom of thought, freedom of association and mutual respect and tolerance of different faiths and beliefs, fairness, social responsibility, liberty and equality for all;
- ensure that they set expectations of the highest standards of behaviour and conduct within school, regardless of whether in class or beyond, and challenge activities by any pupil that may be considered to be of an inappropriate nature.

All staff are expected to refrain from:

- making inappropriate (innuendo) remarks to, or about, a pupil;
- discussing personal relationships with or in the presence of pupils;
- discussing a pupil's personal relationships in inappropriate settings or contexts;
- making unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such.

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

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

Dress and appearance

All staff are expected to wear clothing which:

- promotes a positive and professional image;
- is appropriate to their role;
- is not likely to be viewed as offensive, revealing or provocative;
- does not distract, cause embarrassment or give rise to misunderstanding;
- is absent of any political or otherwise contentious slogans;
- is not considered to be discriminatory.

Rewards and gifts

All staff are expected to abide by the Trusts Gifts and Hospitality Policy which clearly sets out when and how rewards and gifts may or may not be used/accepted.

Infatuations

All staff are expected to report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff. This must be reported to a senior leader.

Photography, videos and other creative arts

All staff are expected to:

- refrain from taking images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care; or making audio recordings of a child's disclosure;
- refrain from making any visual recordings of pupils (still or moving), without the prior consent of a senior leader;
- seek parental consent for a photograph/video to be taken or published;
- ensure pupil's consent is obtained for the use of images/recordings after the age of 13 years old. This is in line with the Data Protection guidance;
- ensure that the storage and distribution of such images/recordings is approved by senior leaders and care is taken to avoid illicit use of the images;
- ensure that all images/recordings are available for scrutiny in order to screen for acceptability;
- be able to justify images/recordings of children in their possession;
- avoid making images/recordings in one-to-one situations;
- refrain from taking images/recordings of pupils using personal mobile phones.

Social contact

All staff are expected to:

- always approve any planned social contact with pupils or parents with a senior leader;
- advise a senior leader of any (unplanned), social contact they have with a pupil which might cause concern;
- report and record any situation which they feel might compromise the School or their own professional standing;
- refrain from sending personal communication to pupils e.g. letters and cards unless agreed with a senior leader.

Communication using technology

All staff are expected to refrain from:

- passing personal contact details to pupils including email, home or mobile phone numbers;
- any communication with pupils which may be construed as grooming;
- making any visual recordings of pupils (still or moving), without the prior consent of a senior leader;
- using any personal equipment when communicating with pupils.

For the purposes of exchanging coursework or homework only, it is permitted for staff to exchange their school email address with pupils. However, any correspondence whilst using school email must be very cautious and perfunctory to avoid any misconstruing.

Physical contact

All staff are expected to:

- refrain from touching pupils in a way which may be considered as indecent or for the gratification of the adult or the pupil;

- avoid any gratuitous or unnecessary physical contact with pupils (this includes horseplay, tickling or stroking the head etc);
- be prepared to explain actions and accept that all physical contact is open to scrutiny;
- always encourage pupils, where possible, to complete self-care tasks independently;
- avoid using physical contact as a reward (this includes hugs and pats on back etc);
- ensure that physical contact is never secretive or represents a misuse of authority.

Behaviour management and physical restraint

All staff are expected to:

- try to defuse situations before they escalate;
- ensure all rewards and sanctions are within the Schools agreed 'Behaviour Policy';
- ensure parents are informed of all sanctions;
- avoid the use of sarcasm or demeaning and insensitive comments towards pupils.

Please see the Behaviour Policy for full details on behaviour management strategies upheld by the School.

Some situations may give rise to the need for physical intervention. However, school staff must ensure that they have considered the pupil's safeguarding and welfare when restraint is used especially on a pupil with SEND. The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances. If an alternative method of control and restraint is possible then these methods should be used first. If physical contact is the only suitable method then the use of 'reasonable force' is permitted.

Force is usually used either to 'control' or 'restrain'. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight or where a pupil needs to be restrained to prevent violence or injury. The key point to always remember is that 'reasonable in the circumstances' means using no more force than is needed for that situation.

The following list is not exhaustive but provides some examples of situations where reasonable force can be used:

- to remove disruptive children from the classroom where they have refused to follow an instruction to do so;
- to prevent a pupil behaving in a way that disrupts a school event or a school trip or visit;
- to prevent a pupil leaving the classroom where allowing the pupil to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- to prevent a pupil from attacking a member of staff or another pupil, or to stop a fight;
- to restrain a pupil at risk of harming themselves through physical outbursts.

Under no circumstances should staff use force as a punishment. Please see the 'Use of Reasonable Force Policy' for full guidance.

One-to-one situations

All staff should:

- avoid meeting with pupils in remote, secluded areas of the school;
- ensure that there is visual access and/or an open door in one-to-one situations;

- inform other staff of the meeting beforehand, assessing the need to have them present or close by;
- avoid any one-to-one situations with pupils that may result in an interpretation of secrecy;
- always report any situation where a child becomes distressed or angry to a senior leader.

Intimate care

Some pupils may require intimate care – this may include support with toileting or removing soiled clothing. In supporting such children, staff should:

- take account of the 'Supporting Pupils with Medical Conditions' Policy;
- adhere to a care plan agreed with parents for pupils requiring intimate care;
- encourage pupils to act as independently as possible;
- ensure that another member of staff is in close vicinity if intimate care is required;
- record any instances of intimate care, justifying the need for any variations from the care plan;
- share the need for intimate care with parents, if irregular or unexpected.

Toileting, Showering and Changing

General Principles:

- shower facilities for boys and girls should be separate, clean and well-maintained so that pupils' health and safety, privacy and dignity are not put at risk;
- suitable toilet and washing facilities should be provided for the sole use of pupils;
- separate toilet facilities for boys and girls aged 8 years or over should be provided except where the toilet facility is provided in a room that can be secured from the inside and that is intended for use by one pupil at a time;
- suitable changing accommodation and showers should be provided for pupils aged 11 years or over at the start of the school year who receive physical education;
- where separate facilities are provided for pupils who are disabled, they may also be used by other pupils, staff, supply staff, volunteers and visitors, whether or not they are disabled;
- as far as possible, members of staff should supervise or assist pupils of the same sex;
- wherever possible designated single sex changing room or areas should be used. If this is not possible and boys and girls change together, in a classroom for example, consideration should be given to utilising furniture or screens to provide discrete areas.

All staff are expected to:

- avoid any physical contact when children are in a state of undress;
- avoid any visually intrusive behaviour and, where there are changing rooms, announce their intention of entering;
- avoid remaining in the room unless a pupil's needs require it (judgement will be based on the age and development needs of the pupils);
- take into account the needs of pupils from different religions, beliefs and cultural backgrounds.

Where pupils need assistance staff are expected to:

- take account of the 'Intimate Care' Policy held within the 'Supporting Pupils with Medical Conditions' Policy;
- encourage pupils to be as independent as possible, giving verbal help before offering assistance;
- provide assistance openly, not out of sight of others.

All staff must not:

- change in the same place as children;
- shower with children.

When off-site showering and changing arrangements are in place:

- the above guidance will apply;
- pupils will not share changing/toilet facilities with members of the public;
- where changing facilities are shared with pupils from another school, adults from both schools will make appropriate arrangements and properly risk assess together.

Visual access to classrooms

All staff are expected to ensure that there is always visual access and/or an open door to their classrooms.

Where staff feel the need to cover the visual access to their door temporarily, they must be able to justify doing so on child protection grounds and must ensure that there is a second member of staff in the classroom at the time.

Administration of medication

In dispensing medication to pupils, staff should:

- Take account of the school's 'Supporting Pupils with Medical Conditions' Policy;
- Ensure that they are authorised to dispense medication;
- Ensure that parental consent has been secured and recorded;
- Ensure that all medicines are stored in a locked cupboard, or if refrigerated, in an area not accessible to pupils;
- Record the storage, dispensing and disposal of medication;
- Not force a pupil to take medicine if they refuse to do so - in such a case, parents should be informed immediately and emergency services called if needed.

Staff must also ensure that all personal medication is stored securely in a locked area at all times.

Transporting pupils in staff cars

Pupils should only be transported in staff cars as a matter of last resort – where alternative modes of transport are unavailable and only when the pupil is not distressed in any way. Normally, this will mean when taking pupils home – trips should not be planned with the intention of using staff vehicles for transport. In transporting pupils using a staff vehicle:

- the consent of a senior leader should be secured on each occasion;
- there should be at least one adult additional to the driver acting as an escort;
- the member of staff should have 'Business' car insurance on their vehicle;
- the member of staff should ensure that the car is roadworthy;
- the pupil should sit at the back of the car – and be instructed to wear a seat belt.

Appendix 4: Safeguarding and Prevent Checklist

Please ensure all checks are complete.

Please be aware this is not an exhaustive list of all safeguarding measures.

No.	Key Actions	School Lead	RAG
Safeguarding Policy, Training, Procedures and Record Keeping			
1.	Ensure the Trust Safeguarding Policy is fully compliant and includes the Prevent Duty, Channel Process and FGM Duty.		
2.	Ensure the Trust Safeguarding Policy is available on staff shared drive alongside the supplementary government guides.		
3.	Ensure Trust Safeguarding Policy is uploaded to school website.		
4.	Ensure Star's Safeguarding Policy reflects the region, for example includes Prevent lead/local children's centre.		
5.	Ensure Parent Handbook outlines the school's approach to safeguarding.		
6.	Ensure there is evidence that Safeguarding Policy and KCSIE Part 1 has been disseminated to ALL staff at annual whole school training (e.g. registers, handouts).		
7.	Ensure Annual Safeguarding Declaration has been signed by all staff and all understand the responsibilities for safeguarding.		
8.	Retain evidence of any safeguarding updates shared with staff outside of the annual training (e.g. registers, handouts).		
9.	Ensure staff are aware of signs of abuse (including peer on peer and sexting), Prevent duty, and duty to report discovery of FGM.		
10.	Ensure staff aware of the early help process and their role within it.		
11.	Ensure staff are aware of the Fundamental British Values and their role in ensuring pupils understand these		
12.	Ensure Annual Prevent Training records complete for all staff and Governors.		
13.	Ensure staff and Governors are inducted into the school's own Prevent strategy (e.g. curriculum programme, policies and procedures).		
14.	Ensure Trust Prevent Risk Assessment/Action Plan complete.		
15.	Ensure there is a Designated Safeguarding Lead (and at least one Deputy) in place. The DSL should also be the Prevent Lead and Designated Teacher for Looked After Children.		
16.	Ensure Designated Safeguarding Lead refresher training up to date. Must be familiar with: - Safeguarding Partners arrangements & procedures (get guidance). - Identification of the signs and symptoms of abuse (including peer on peer, sexting, cyber-bullying, domestic violence, gender-based violence, violence against women and girls, child sexual exploitation, faith-based abuse, trafficking)		

No.	Key Actions	School Lead	RAG
	- Identifying and Tackling extremism (pupils at risk of radicalisation) - Their role as designated teacher for looked after children - Forced Marriages guidance - Safer Recruitment Procedures - Relevant legislation and guidance - Referral Processes - CAF - FGM duty - Lead Governor for Safeguarding/child protection - Roles and responsibilities of DSL, Principal, Governors, staff, pupils and parents. File original Certificate in personnel file and copy in the central Personal Development, Behaviour and Welfare Ofsted folder.		
17.	Ensure Deputy Designated Safeguarding Lead(s) refresher training up to date and file original Certificate in personnel file and copy in the central Personal Development, Behaviour and Welfare Ofsted folder.		
18.	Ensure Designated Safeguarding Lead JD/PS (Appendix 1 Safeguarding policy) filed in DSL's and DDSL's Personnel file.		
19.	Ensure close communication between DSL and Attendance leads.		
20.	Ensure the Local Authority is informed when a pupil is deleted from the school register on any of the 15 grounds for deletion. Ensure that the local authority is aware of any missing information when a child is deleted from the school roll, such as the name of the destination school, or the address to which the child is moving. (This is to help identify children missing from education).		
21.	Ensure the DSL role has a separate job description.		
22.	Ensure the Designated LAC Teacher has a separate job description.		
23.	Ensure SLT are familiar with the LA safeguarding report. Consider the weaknesses/trends in the context of the Star school setting and make any necessary adjustments.		
24.	Ensure all staff know who the DSL/DDSL/Prevent Officer are and how to contact/ report concerns via the Trust Safeguarding Concern Form.		
25.	Ensure all pupils know who the DSL/DDSL/Prevent Officer are – display posters of the DSL/DDSL in key areas throughout the school.		
26.	Ensure pupils have a number of avenues through which to express their opinions and raise concerns.		
27.	Ensure the school works in line with locally agreed procedures when dealing with safeguarding issues.		
28.	Ensure CoG and designated Governor for Safeguarding is aware of GB responsibilities with respect to safeguarding and the Prevent Duty.		
29.	Ensure there is evidence of regular meetings between the designated Governor for Safeguarding and Designated Safeguarding Lead.		
30.	Ensure the Principal's report to Governors includes an update on safeguarding.		
31.	Ensure the Safeguarding Partners 157/175 Audit is completed annually.		

No.	Key Actions	School Lead	RAG
32.	Ensure safeguarding is a standing item on the LGB agenda and SLT agenda.		
33.	Ensure ECM Group records are clear, presentable and complete.		
34.	Ensure CP records are in a central file of all CP pupils (case conference notes, records of internal support, front sheet, chronology, Safeguarding Concern Form etc.) and managed in line with the Trust Safeguarding (Child Protection) Policy.		
35.	Ensure there is a CP plan for pupils on the CP register.		
36.	Ensure procedures in place to deal with allegations of abuse against staff (including malicious allegations).		
37.	Ensure the Trust's HR team are informed as soon as the school are aware of any allegation against a staff member.		
38.	Ensure Safer Working Practices outline in Safeguarding Policy adhered to.		
39.	Ensure Disqualification by Association checks undertaken for 'relevant staff' in 'relevant settings' on an annual basis.		
40.	Ensure the school have more than one contact name and telephone number for each child.		
Safer Recruitment and Selection			
41.	Ensure Trust Safer Recruitment Policy in place and adhered to.		
42.	Ensure full recruitment records available for all staff with evidence of application form, shortlisting against criteria, interview notes, references, medical, qualifications, ID documentation, Job Description and Person Specification, etc.).		
43.	Ensure selection processes take child protection into account with evidence of child protection question asked at interview.		
44.	Ensure all pre-employment and safer recruitment checks evidenced through single central record - records for all existing staff (including supply) & governors up to date and no gaps. Must provide evidence that supply staff and ITT trainees have been fully checked by their agency/provider.		
45.	Ensure all Trust Due Diligence checks required for Governors are complete.		
46.	Ensure all DBS clearance renewals have been completed for all staff and governors.		
47.	Ensure Principal plus two members of SLT have completed refresher safer recruitment training and file original Certificate in personnel file and copy in the central Personal Development, Behaviour and Welfare Ofsted folder.		
48.	Ensure two governors have completed refresher safer recruitment training and certificates are filed in the central Personal Development, Behaviour and Welfare Ofsted folder.		
49.	Ensure the school complete the relevant risk assessment for volunteers.		
Safe Environment			
50.	Ensure there are dedicated displays linked to key messages around fundamental British values, safeguarding and personal safety.		

No.	Key Actions	School Lead	RAG
51.	Ensure there are display posters signposting pupils in need to support (e.g. Child Line, NSPCC).		
52.	Ensure appropriate measures/controls for the storage of medication in place.		
53.	Ensure that there is a risk assessment for all movement across the estate and that all staff are following it.		
54.	Ensure that there is a complete, clear and presentable risk assessment of the FULL estate for the last three terms, and that their action points have been implemented.		
55.	Ensure there is a complete and up-to-date fire risk assessment for entire estate.		
56.	Ensure an appropriate supervision rota is in place.		
57.	Ensure all fingerprint access panels for all areas of the school are working & gates are closing (if applicable).		
58.	Check that all staff have and wear ID badges.		
59.	Ensure all visitors are required to sign in and out of school and given visitor badges and that staff and pupils are aware that they should challenge any individuals who are not known and not wearing Visitor Badge.		
60.	Ensure Visitors have access to the school's 'Safeguarding Guide for Visitors' (see Trust template)		
61.	Check that all 'HSE' and other risk awareness posters are clearly presented across the estate.		
62.	Ensure appropriate web-filtering and monitoring in place (which is age-appropriate and includes monitoring of community languages)		
63.	Ensure all statutory checks are complete and evidenced.		
64.	Ensure appropriate First Aid training undertaken by relevant staff and file original Certificate in personnel file and copy in the central Personal Development, Behaviour and Welfare Ofsted folder.		
65.	Ensure First Aid boxes in place and appropriately signposted in school.		
66.	Ensure that a suitably detailed log of accidents is maintained and is up to date.		
67.	Ensure appropriate Fire Safety/Marshal training undertaken by relevant staff and file original Certificate in personnel file and copy in the central Ofsted folder.		
68.	Ensure emergency evacuations take place on a termly basis and evidenced.		
69.	Ensure procedures for lockdown are in place (see Trust BCERP) and records of drills retained.		
70.	Ensure Health and Safety Policy in place.		
71.	Ensure written confirmation from alternative providers confirming the relevant checks have taken place.		

No.	Key Actions	School Lead	RAG
Other related policies and procedures			
72.	Ensure the Strategic Plan includes Prevent priorities		
73.	Ensure Trust Anti-Bullying Policy in place and shared with staff.		
74.	Ensure Anti-Bullying approach outlined in Parent Handbook.		
75.	Ensure Anti-Bullying Policy available on school website.		
76.	Have a 'Bullying' record that is up-to-date and verified – Ofsted will want to speak to a pupil recorded in it.		
77.	Have a record of racist incidents that is up to date and indicates actions taken in response to such incidents.		
78.	Ensure Volunteers Procedure implemented.		
79.	Ensure all external speakers are vetted, approved and recorded (including declarations) in line with the Trust External Speakers and Charities Policy and Trust Vetting and Due Diligence Policy.		
80.	Ensure all charitable activity is approved and recorded in line with the Trust External Speakers and Charities Policy and Trust Vetting and Due Diligence Policy.		
81.	Ensure staff familiar with Trust Staff Code of Conduct Policy.		
82.	Ensure pupils familiar with Trust Pupil Code of Conduct.		
83.	Ensure Trust Complaints Policy uploaded to website and complaints dealt with according to processed outlined within.		
84.	Ensure staff and Governors are familiar with Social Media Policy.		
85.	Ensure Home School Agreements (outlining commitment to FBV) completed for all pupils.		
86.	Ensure website outlines inclusive offer.		
87.	Ensure Trust Attendance and Punctuality Policy in place and procedures in place to respond to appropriately to children who go missing in education.		
88.	Ensure school trips are run in line with Trust Off Site Visits / Requirements for Off Sites Visits and Adventurous Activities Policy and all trips approved via EVOLVE system.		
89.	Ensure Trust Whistleblowing Policy in place and uploaded to the school website.		
90.	Ensure Trust Supporting Pupils with Medical Conditions Policy in place and records relating to the medical needs register, administration of medication, support plans etc. up to date.		
91.	Ensure Trust Behaviour Policy, School Rewards and Sanctions, Trust Powers of Search Policy and Trust Use of Reasonable Force Policy in place and adhered to.		
92.	Ensure Trust Equal Opportunities Policy in place and adhered to.		

No.	Key Actions	School Lead	RAG
93.	Ensure Trust Equalities Policy in place and adhered to.		
94.	Ensure Trust Pupil ICT Acceptable Use Policy in place and adhered to.		
95.	Ensure Trust Electronic Information and Communications Policy in place and adhered to.		
96.	Ensure Trust Induction Policy in place and adhered to.		
97.	Ensure School PSHE Policy in place and adhered to.		
98.	Ensure Trust BCERP in place and shared with staff.		
99.	Ensure Trust Sex and Relationships Education Policy in place and adhered to.		
100.	Ensure Trust SEN – Information, Policy and Guidance Policy in place and adhered to.		
101.	Ensure Trust Whole School Food Policy is in place and adhered to.		
102.	Ensure Trust Collective Worship Policy is in place and adhered to.		
103.	Ensure Trust Faith and Character Education Policy in place (Faith schools only).		
104.	Ensure Faith and Character Education training has been provided to all staff. (Faith schools only).		
105.	Ensure annual Faith and Character Education Policy declarations are complete for all staff (Faith schools only).		
106.	Ensure the school Faith and Character Education SEF is up to date (Faith schools only).		
107.	Ensure Trust data protection policy is in place and adhered to		
Curriculum			
108.	Ensure curriculum evidences teaching of e-safety.		
109.	Ensure curriculum promotes fundamental British Values.		
110.	Ensure pupils are taught how to identify and respond appropriately to risk.		
111.	Ensure pupils understand what constitutes unsafe situations and how to keep themselves and others safe, including unhealthy relationships.		
Early Years			
112.	Ensure that EYFS leader and staff working in the early years have read and understood 'The statutory framework for the early years: setting the standards for learning, development and care of children from birth to five.' This document sets out the minimum standards for care of children in the early years.		
113.	Ensure that the specific staffing ratios for children aged 2,3 or 4 are adhered to and that Reception classes do not exceed infant class size regulations: For children aged 2: - There must be at least one member of staff for every 4 children. - At least one member of staff must hold a full, relevant level 3 qualification.		

No.	Key Actions	School Lead	RAG
	- At least half of all other staff must hold a full, relevant level 2 qualification. For children aged 3+: - Where a person with QTS, EY Professional Status, EYTS or another suitable level 6 qualification is working directly with children: - There must be at least one member of staff for every 13 children. - At least one other member of staff must hold a full and relevant level 3 qualification. Where there is no person with QTS, EY Professional Status, EYTS or another suitable level 6 qualification working directly with children: - There must be at least one member of staff for every 8 children. - At least one member of staff must hold a full and relevant level 3 qualification. - At least half of all other staff must hold a full and relevant level 2 qualification. - (Staff must be aged 17 or over to be counted within ratios. The school must be satisfied that an apprentice or student on long-term placement aged 17 + is competent before including them in a ratio). For Reception class, the minimum legal requirement is one fully qualified teacher for every 30 children.		
114.	Ensure that a suitable induction process is in place that includes safeguarding of young children. This must include procedures for reporting concerns, administering medicine and the acceptable use of mobile phones/ technology.		
115.	Ensure that at least one person who has received up to date certified training in paediatric first aid (PFA) is available at all times when early years children are present.		
116.	Ensure that the procedure for caring for sick or infectious children is discussed with parents.		
117.	Ensure that: - written permission is received before any medication is administered - where medicine is provided on prescription, this can only be administered if prescribed for the named child by a doctor, dentist, nurse or pharmacist - records must be kept of any medicine that is administered - staff must receive appropriate training before administering medicines - any staff medication is secured safely.		
118.	Ensure that the dietary needs of children are known and acted upon. Ensure that hygienic facilities are in place for the preparation of healthy snacks and that fresh drinking water is always accessible.		
119.	Ensure that toilets and, where necessary, nappy changing facilities, are adequate and hygienic.		
120.	Ensure that a key person is identified for each child in the early years and that they are clear about their responsibilities with respect to this child.		
121.	Ensure that a supervision process is in place for all staff working with early years children that enables the confidential discussion of sensitive issues.		

No.	Key Actions	School Lead	RAG
122.	Ensure that arrangements can be made for staff to speak confidentially with parents and carers.		
123.	Ensure that clear processes are in place to ensure children are only released to individuals notified to the school, and that no children ever leave the premises unsupervised.		

Annual Review Records

Term	Review Date	Completed by
Autumn		
Spring		
Summer		

Appendix 5: Staff safeguarding declaration

Annual Safeguarding Declaration

1. I have received and read the School's Safeguarding (Child Protection) Policy, including the appendices.

2. I have received and read Part 1 of the DfE guidance 'Keeping Children Safe in Education', (DfE 2020).

3. I have received and read the Trust Staff Code of Conduct.

4. I have completed the School's safeguarding training, including PREVENT training.

5. I understand that supplementary safeguarding guidance is available at www.gov.uk

6. I agree to adhere to the protocols set out in the School's Safeguarding (Child Protection) Policy, the Staff Code of Conduct and the DfE guidance 'Keeping Children Safe in Education', (DfE 2020).

***Note**: Star Academies takes its responsibility to safeguard children very seriously. If any concerns regarding conduct contrary to the Safeguarding (Child Protection) Policy come to our attention, appropriate action will be taken.*

Print name: ……

Sign: ……

Date: ……

Appendix 6: Safeguarding concern form

Safeguarding Concern Form

CONFIDENTIAL

PART 1: INTERNAL NOTIFICATION OF CHILD PROTECTION/WELFARE CONCERN TO THE DSL

Name(s) of pupil:	
D.O.B.	
Class / Year	
What is the nature of your concern?	
- What are you most concerned about? i.e. physical, sexual, emotional abuse or neglect, self-harm, bullying, sexual exploitation, sexualised behaviour, honour-based abuse / forced marriage, e-safety issues, radicalisation, other … - Have you had any previous concerns about this pupil? If so, what, when, action? - ***If you have received a 'disclosure' from or about a child please complete Part 2 overleaf***	
Are there any injuries of concern?	Yes / No
Describe injury and complete 'Part 3: Body Map' to show where the injury is and its approximate size	
Any action already taken	
Signed	
Name	
Job title	
Time/Date	
If you have received a 'disclosure' from or about a child please complete Part 2 overleaf	

PART 2: RECORD OF 'DISCLOSURE' FROM / ABOUT A CHILD

**It is not advisable to try and complete this record at the time. The important thing is to listen actively and carefully and reassure the child.*

Name of person to whom the 'disclosure' has been made	
Position / relationship with child	
How did the 'disclosure' come about i.e. when and where?	
Who was present when the disclosure was made?	
Summary of information disclosed	

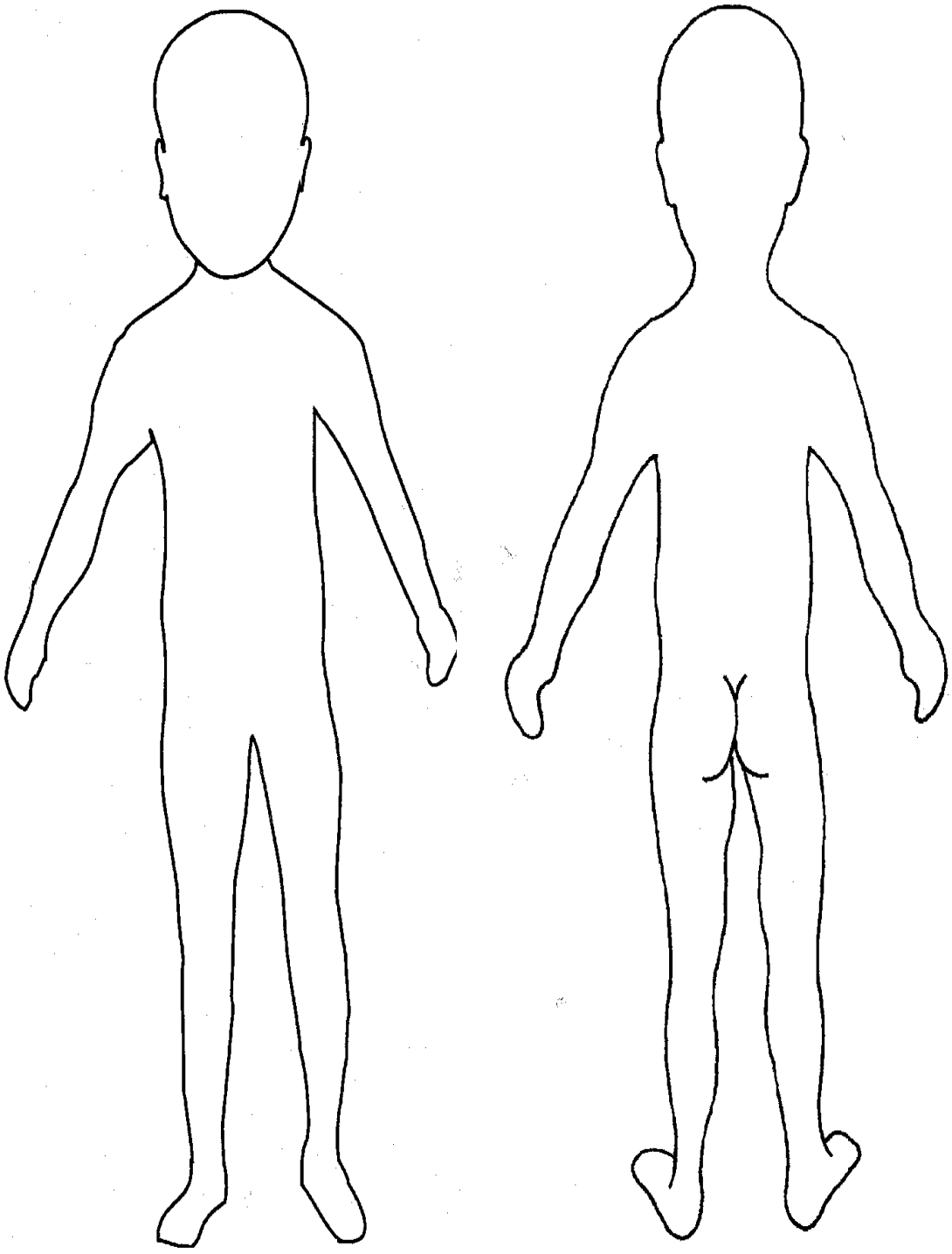
WHO is said to be involved	
WHAT is said to have happened / be happening?	
WHERE is this said to have happened / be happening?	
WHEN is this said to have happened / be happening i.e. duration, most recent occasion etc?	
WHO else may have witnessed what happened?	
HOW and where is the pupil now?	
Continuation sheet added	YES / NO

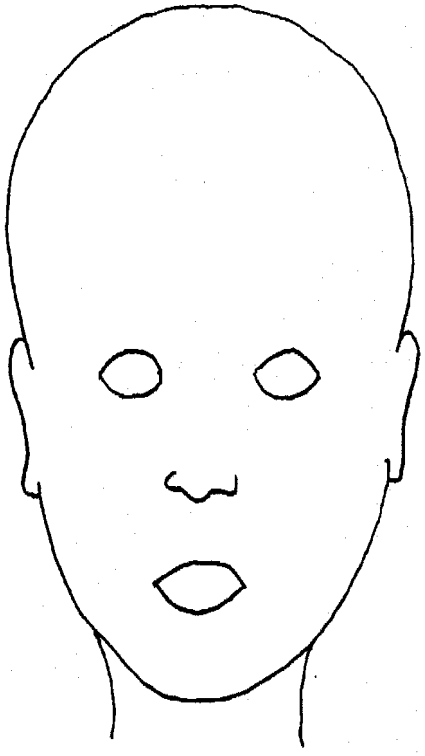
Note:

- *Differentiate clearly between fact, opinion, interpretation and stick to the facts as you understand them wherever possible.*
- *If you have used quotes please ensure that they are accurate.*
- *Make a note of any open questions asked or minimal prompts used.*
- *Any notes made 'at the time' should be attached to this pro-forma; these may be required as evidence if the matter goes to court.*

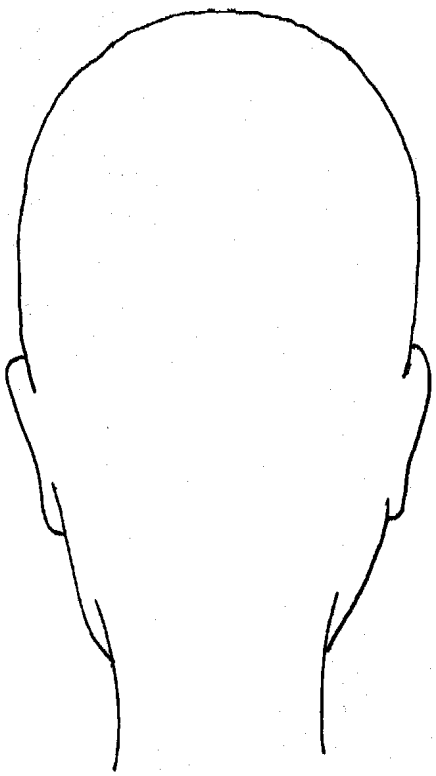
Signed	
Name	
Job title	
Time/Date	

PART 3: BODY MAP





FRONT



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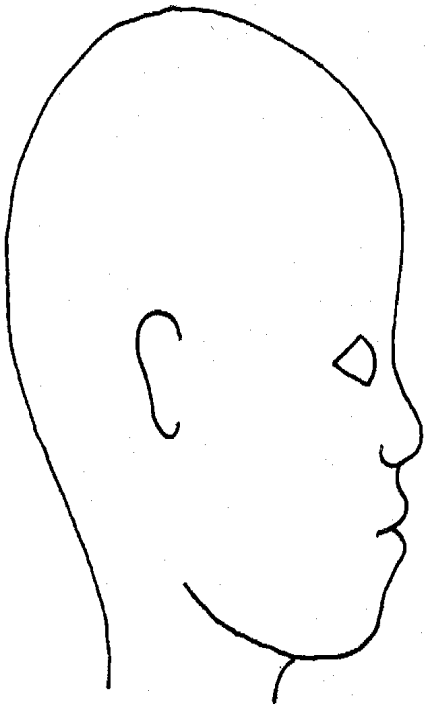

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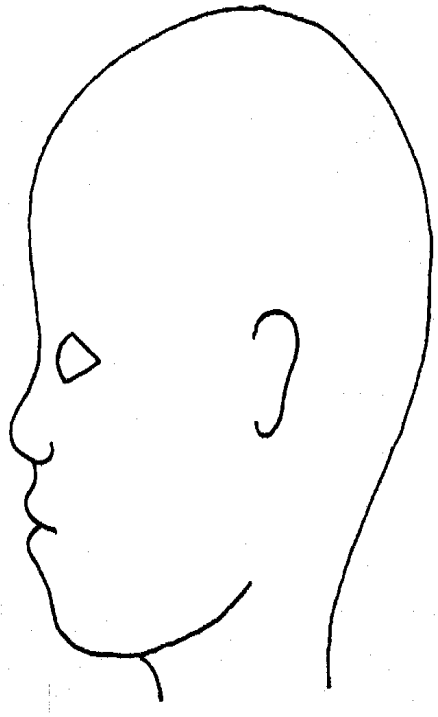

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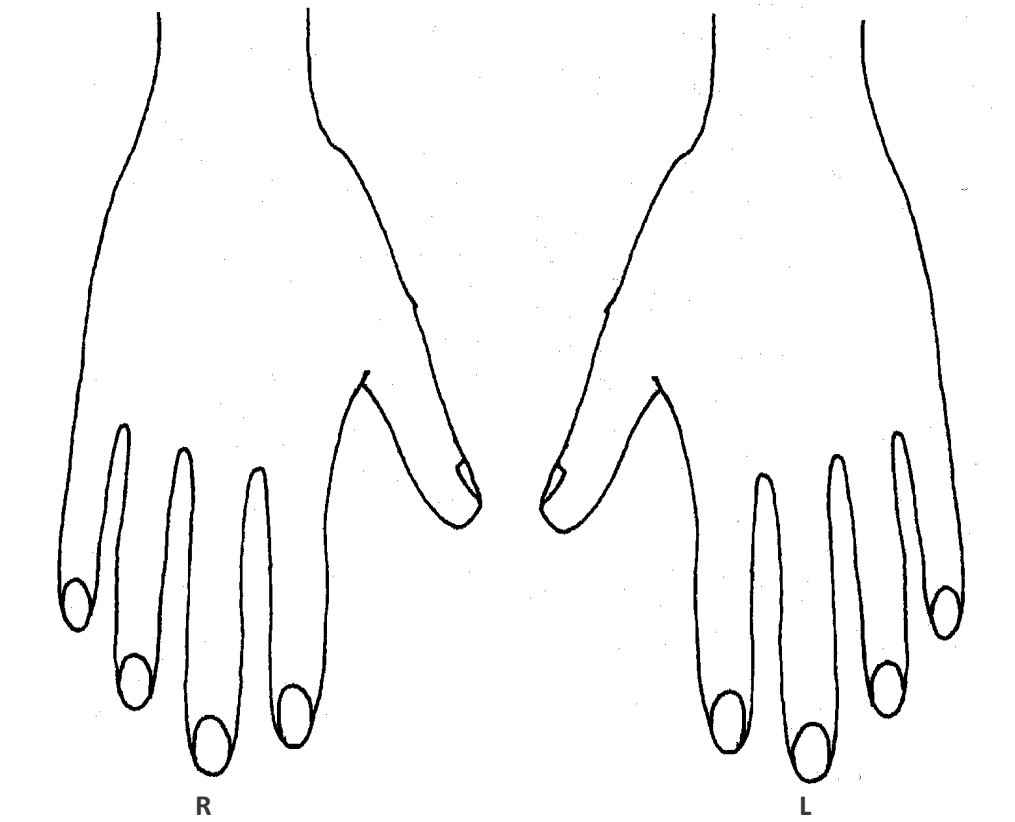

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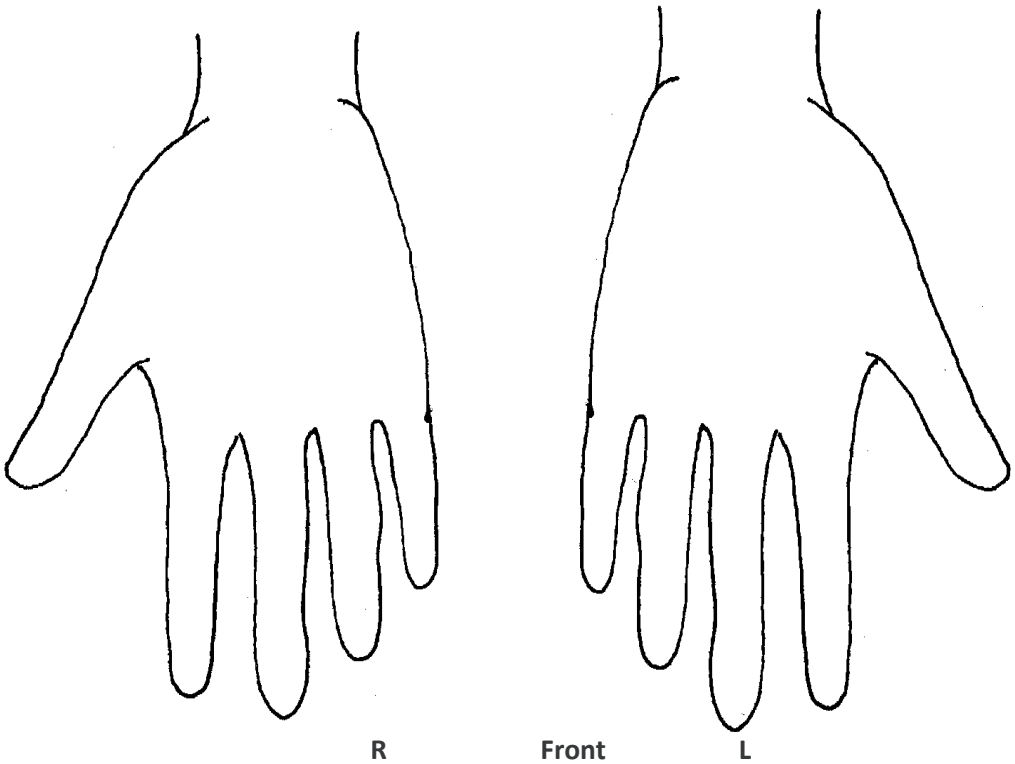

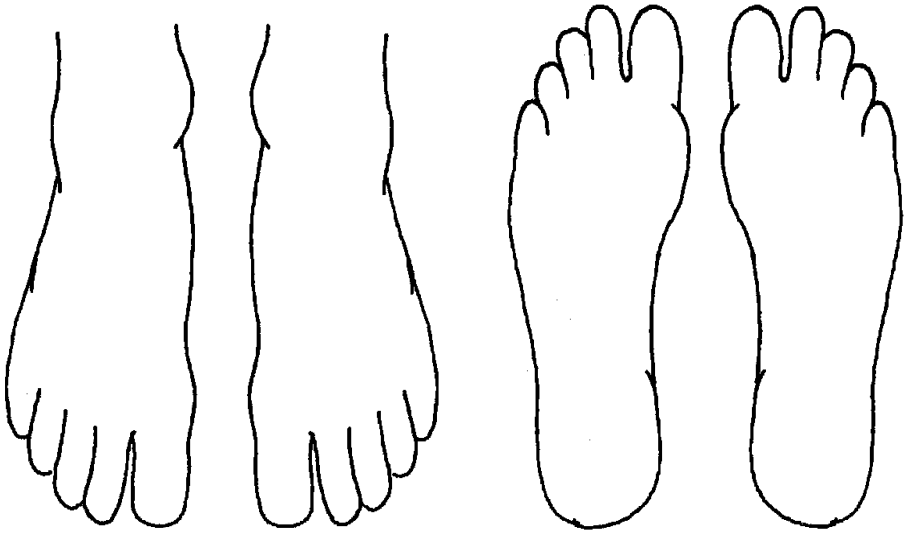

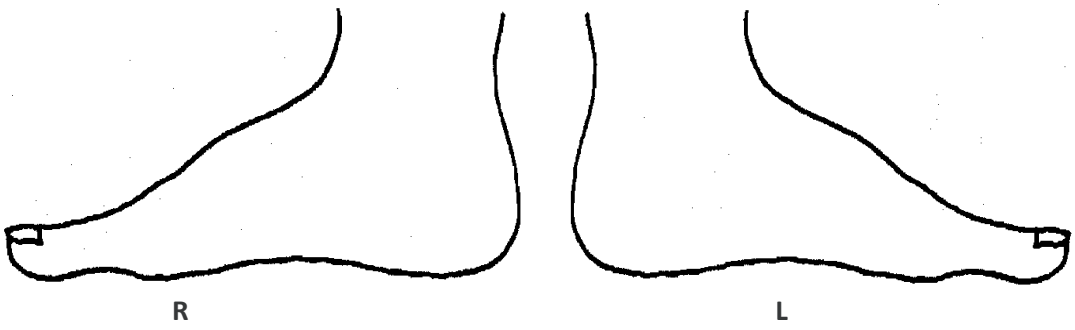

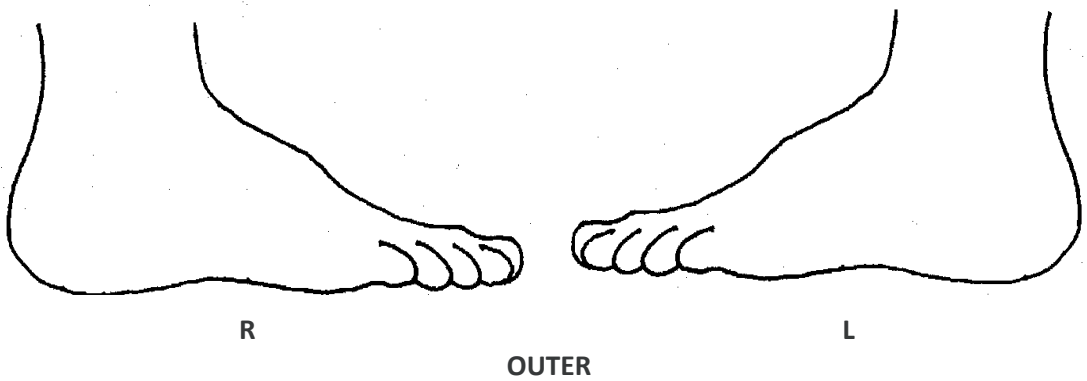

PART 4: ACTION TAKEN BY DSL

Time and date information received by DSL and from whom	Time	
	Date	
	From	
Action taken (internal & external advice sought, referral to SENCO, Attendance Officer, Children's Social Care, continued monitoring etc) Include time, dates, names, who information shared with and when etc		
Parents informed and reasons?	Yes / No	
Pupil Child Protection File created?	Yes / No	
Front Sheet populated?	Yes / No	
Chronology Record started/updated	Yes / No	

Signed by DSL	
Name	
Time/Date	

Appendix 7: Safeguarding Risk Assessment – Allegations Against Staff

The purpose of the safeguarding risk assessment is to identify:

- If there is any risk to children, young people or adults with whom the employee has contact with, in a position of trust
- How any risk identified should be best managed
- Whether the employee is safe to continue in their role
- Any future implications should the employee continue in their role

1. BACKGROUND

Name:	
Designation:	
Establishment:	
Date DBS Checked:	
Outcome of DBS Check:	

1. Are any children present in the household of the employee: (Yes/No)

   If yes, please provide gender and age details:

Gender	Age

2. Date of incident: _____
3. Context in which the alleged incident took place:

   See attached Statement from XX

2. RISK ASSESSMENT FACTORS

On the basis of the evidence available, professional judgement and experience, the level of risk should be assessed as follows for the appropriate risk assessment factors below:

Low risk (L):

No safeguarding action is required and/or safeguarding issues have been addressed.

Moderate risk (M):

Safeguarding Protection Plan is required to manage the risk and/or remains in place.

High risk (H):

Protection Plan requires implementation. Legal action is being taken. The behaviour is persistent and/or deliberate

Severe risk (S):

Life may be in danger, risk of major injury or serious physical or mental ill harm. The incidents are increasing in frequency and/or severity.

Risk Assessment Factor:	**Risk L/M/H/S**
What is the specific allegation/offences? *Assess the risk based on the gravity of the allegations or offence*	
Is the matter being dealt with by another professional agency e.g. Police or Local Authority Safeguarding Officer?	This question does not need to be rated.
If the matter is currently being dealt with by another agency, what is the current position of the investigation or intervention?	This question does not need to be rated.
How severe is the harm (threatened or inflicted) and are there any children and/or other vulnerable adults involved? *Assess severity of harm threatened or inflicted*	
Is there evidence to suggest that the harm is likely to continue or escalate? *Assess the risk based on the likelihood of the harm continuing or escalating*	
Is there evidence to suggest that the harm was premeditated? *Assess the likelihood of the harm involving premeditation*	
Is there evidence to suggest that the harm was accompanied by sustained threats or coercion? *Assess the likelihood of the harm involving threats or coercion*	
Is there a pattern of history for this type of behaviour? *Assess the level of risk based on previous behaviour, frequency and severity*	

What is the future risk of harm posed to the victim?	
What is the risk of harm posed to other children or adults? *What is the likelihood of harm to the child or adults*	
Have there been any previous concerns or complaints? *Assess the level of risk based on previous history, frequency and seriousness of issues*	
What has been the impact on the employee's health and wellbeing? *What is the level of risk based on the employee's current health*	
Is the employee receiving any medical support? If not, is this intended? *Assess the level of risk incurred from medication or existing treatment plan*	

3. RISK ASSESSMENT SUMMARY

Overall assessment of risks identified, including the risk to others:

Views and recommendations of professional agency e.g. Police/Local Authority or Safeguarding Officer:
Views and recommendations of Risk Assessor:
Views of Individual:
Overall Risk/ (Low/Moderate/High/Severe):

4. AGREED ACTIONS

Consideration should be given to appropriate actions that will support the reduction of risk, for example, training and development, supervision, peer support alternative duties and access to occupational health services.

Action	Desired outcome	Timescale	Responsible Officer

Risk Assessor: _____ Signature: _____

Employee Name: _____ Signature: _____

Date of Risk Assessment: _____

Date of Review: _____

Appendix 8: Safeguarding incident involving a member of staff & pupil in school

1
- INFORM PRINCIPAL, LINE MANAGER OR DESIGNATED SAFEGUARDING LEAD OF THE CONCERN/ALLEGATION

2
- ENSURE CHILDREN ARE SAFEGUARDED
- REMOVE PUPIL AND MEMBER OF STAFF FROM SITUATION
- SCHOOL LEAD TO INFORM PARENTS/CARERS OF PUPIL
- DO NOT QUESTION THE VICTIM OR WITNESS AT THIS STAGE

3
- INITIAL CONSIDERATION STAGE
- INFORM TRUST HR/SAFEGUARDING LEAD AS SOON AS POSSIBLE FOR FURTHER ADVICE

4
- TRUST HR & APPROPRIATE SENIOR MANAGER AGREE NEXT STEPS
- IF REQUIRED, SCHOOL LEAD/TRUST HR LEAD CONTACT THE LADO AS SOON AS POSSIBLE
- SCHOOL LEAD/TRUST HR LEAD/LADO AGREE NEXT STEPS

5
- POSSIBLE COURSES OF ACTION:
  - NO ACTION
  - INVESTIGATION/DISCIPLINARY ACTION
  - PROFESSIONAL STRATEGY MEETING

Appendix 9: Child protection file – front sheet

Child Protection File

Front Sheet

Pupil name	
Date of birth	
Any other name by which child is known	

Home address	**Current address (if different)**
Contact tel no.	**Contact tel no.**

Family members i.e. parents / carers / siblings

Name	Relationship	Address	School Details (in the case of siblings)

Date file started	
Are records held in school relating to other connected children?	

Contact details of other professionals

Name	Agency	Address

Appendix 10: Child protection file – removal of information record

Child Protection File

Removal of Information Record

Pupil Information	
Pupil name	
Date of birth	
Removal of Information	
Date documents or complete file removed	
Name and role of person removing documents or complete file	
Signature of person removing documents or complete file	
List documents removed **(or complete file)**	
Reason for removal	
Replacement of Information	
Date documents or complete file replaced:	
Were all documents replaced?	Yes / No
If all documents are NOT replaced please record which documents have not yet been replaced, along with the location of such documents and reason for such documents not having been replaced.	
Name and role of person replacing documents or complete file	
Signature of person replacing documents or complete file	

Appendix 11: Child protection file – chronology of significant events

Child Protection File

Chronology of Significant Events

Pupil name	
Date of birth	

Date of event	Date info received/ recorded	Significant event	Source of information	Actions taken and outcomes (include advice sought, dates, names, who information shared with and when etc)	Parents informed Y/N and reasons	Recorded by (full name and job title)

Appendix 12: Child protection file - record of child protection file transfer

Record of Child Protection File Transfer

PART 1: TO BE COMPLETED BY SENDING/TRANSFERRING SCHOOL

Name of child	
D.O.B.	
Name of school sending CP File	
Address of sending school	
Date file sent	
Name of Principal / Designated Safeguarding Lead	
Method of delivery	
Signature	

PART 2: TO BE COMPLETED BY RECEIVING SCHOOL

Name of school/college receiving file	
Address	
Date received	
Name of Principal/ Designated Safeguarding Lead receiving file	
Had the file been tampered with in transit?	
Signature	