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| Author | Charlotte Harrison | Target group | All employees, consultants and volunteers |
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Introduction

This is a statutory policy that all Anthem schools must make available on their website.

Schools should ensure that the policy is compliant with the school's Local Authority/Local Safeguarding Partnership child protection procedures. Additional Local Authority procedures, or policies, should either be embedded within the policy or added as appendices to the Anthem suite of Child Protection and Safeguarding Policies.

This policy will be reviewed annually.

The Child Protection and Safeguarding Policy must contain:

- The name of the policy – Child Protection and Safeguarding.
- Recognition of statutory responsibility.
- An outline of the safeguarding principles to which the school adheres.
- The name and responsibilities of the Designated Safeguarding Lead (DSL) & Deputy.
- Outline where written arrangements for covering the DSL and Looked After Child designated teacher (DLAC) when they are unavailable or off site.
- The name and responsibilities of the DLAC.
- The name of the Director of Education.
- The procedures for reporting and responding to a child protection/safeguarding concern.
- Reference to the Safer Recruitment Policy and other related policies such as: Anti-bullying, PSHE, Tackling Extremism and Anti-Radicalisation (PREVENT), E-Safety Policy and the Staff Code of Conduct.
- A confidentiality statement.
- An outline of practice with regard to staff (and visitors to school) working with pupils.
- Arrangements for monitoring and evaluation of the policy.
- Signatures, date (of sign-off) and date of next review.

Some text in the following policy is adaptable at the discretion of the school to fit the local context.

This will be monitored at audit to ensure that all local details, local contextual issues and procedures are in place, according to KCSIE September 2023.

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Child Protection and Safeguarding Policy

Anthem Schools Trust and St Mark's Academy fully recognises its statutory responsibilities for Child Protection and Safeguarding. It is committed to promoting the welfare of children and young people and expect all staff and volunteers to share this commitment and be appropriately trained.

School Designated Safeguarding Lead (DSL)

The school has appointed a Designated Safeguarding Lead (DSL) from the senior leadership team in accordance with KCSIE September 2023 guidance.

The DSL (under the Headteacher) is responsible for matters relating to child protection and

Aimee Gallagher – agallagher@stmarks.anthemtrust.uk

In their absence, these matters will be dealt with by the Deputy DSL:

Nicola Van Zyl – nvanzyl@stmarks.anthemtrust.uk

The DSL is key to ensuring that proper child protection and safeguarding procedures and policies are in place and adhered to. They will also act as a dedicated resource available for other staff, volunteers and Anthem Community Council (ACC) Members to draw upon. Parents are welcome to approach the DSL if they have any concerns about the welfare of any child in the school, whether these concerns relate to their child or any other. The DSL will liaise with the Local Authority and work with other agencies in line with statutory guidance *Working Together to Safeguard Children, 2018* (updated 2020) and *Keeping Children Safe in Education, September 2023*.

There will always be cover for this role and arrangements for this are as follows:

- If DSL is off site, all information will be passed to DDSL
- If DSL and DDSL are off site, all information will be passed to any member of the senior team
- This information has been shared with all staff on Staff Training days.

LA Child Protection and Safeguarding

LA children's social care: Merton Local Authority

LA designated officer(s): John Shelley

LA Channel Panel: Patricia Carlisle / Jeanette Martin

Looked-After Children

The Designated Teacher for Looked-After Children (DLAC) is:

Lynda Haughton – lhaughton@stmarks.anthemtrust.uk

The DLAC has received appropriate training and will make an annual report to the ACC and the Trustees in accordance with the latest statutory guidance.

The ACC will consider the information in the report under the scheme of delegation. The Trustees will take any appropriate action.

The DLAC will liaise with the Virtual Head for Looked-After Children to ensure that the funding assigned to the child/young person is put to best use. The role will also encompass the needs of post-LAC students. The arrangements for covering this role should the DLAC be absent or unavailable are as follows:

- If DLAC is absent, all information will be covered by DSL

Anthem contacts

Executive team member with responsibility for safeguarding: Claire Pannell, Director of Governance
- General Counsel

Director of Education: Elma Lawson

Safeguarding Manager: Owen Walters

Others with responsibility

Mental Health: Lynda Haughton – lahughton@stmarks.anthemtrust.uk

LGBTQ+: ELizabeth Bowen – ebowen@stmarks.anthemtrust.uk

SEND: Allicia Wignall – awignall@stmarks.anthemtrust.uk

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Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) September 2023, [Working Together to Safeguard Children 2018](#) (updated 2020), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding partnership.

This policy is also based on the following legislation:

- Parts 3 and 4 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.

- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR).
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our ACC and Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children.

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#). It takes into account local procedures and any guidance from the Department for Education relating to Coronavirus and Covid 19 (where still relevant) and the latest version of the Ofsted Inspection Framework. Additional guidance should continue to be read in conjunction with this policy.

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

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Scope and publication

Safeguarding and child protection is everyone's responsibility and as such this policy applies to all staff (including agency staff), Trustees, (ACC) members, national team staff and volunteers working in each school and applies wherever staff or volunteers are working with pupils even where this is away from the school, for example at an activity centre or on an educational visit. This policy is published on the school's website and can also be made available in large print or another accessible format if required.

The Trustees will facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

The Trustees and ACC Members take seriously their responsibility under Section 175 of the Education Act 2002 and are aware of their obligations in relation to the legislation and statutory guidance above to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our schools to identify, assess and support those children who are suffering harm.

The DfE defines safeguarding and promoting the welfare of children as:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect **specific** children who are suffering, or are likely to suffer, significant harm.

Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

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Principles

The school has a statutory duty to promote and safeguard the welfare of children and have due regard to guidance issued by the Department for Education¹. This school recognises its legal and moral duty to promote the wellbeing of children, protect them from maltreatment, and respond to child abuse, as well as its responsibility to follow the local inter-agency procedures of **Merton**.

Safeguarding Multi-agency Partnership (MAP). The Multi-agency partnership consists of three member groups – the Police, the integrated care boards and the Local Authority Social Care. These have been established from September 2019. We recognise the importance of a whole school approach to safeguarding and child protection; all systems, processes and policies should operate with the best interests of the child at their heart and in accordance with local procedures.

We believe that every child, regardless of age, has at all times and in all situations a right to feel safe and protected from any situation or practice which results in a child being physically or psychologically damaged. We believe that children must receive the right help at the right time to address risks and prevent issues escalating.

We believe that children have the right to have their views heard and considered by all professionals when making decisions to keep the child safe from harm. We will actively enable and encourage children to participate in an open dialogue with all school stakeholders about safeguarding matters and include them in decisions about safeguarding practices, developing an inclusive and open ethos to keeping them safe.

We agree that we have a primary responsibility for the care, welfare and safety of the pupils in our charge, and we will carry out this duty through our teaching and learning, extra-curricular activities, pastoral care and extended school activities. We will teach about safeguarding, including keeping safe online, as part of providing a broad and balanced curriculum covering relevant issues through personal, social health and economic education/RSHE and teach children to recognise when they are at risk and how to get help when they need it.

We additionally understand that as a school we play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture

¹ Keeping Children Safe in Education, September 2023 & Working Together to Safeguard Children, 2018 (updated 2020)

of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our School Behaviour Policy, pastoral system and as above, our inclusive and regularly delivered RSHE curriculum.

We always maintain an attitude of 'it could happen here'. When we have concerns about the welfare of a child, staff will always act in the best interest of the child and will raise these with the school's DSL. In exceptional circumstances, such as in an emergency or a when a genuine concern has not been appropriately acted upon, staff members will speak directly to children's social care.

The school seeks to adopt an open and accepting attitude towards children as part of their responsibility for pastoral care. The school hopes that parents and children will feel free to talk about any concerns and will see school as a safe place if there are any difficulties at home.

We recognise that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal, to aggressive or withdrawn.

Every complaint or suspicion of abuse from within or outside the school will be taken seriously and in all proper circumstances will be referred to an external agency such as children's social care services, the Local Authority Designated Officer (LADO), police or the NSPCC, without investigation by the school. (The appropriate person(s) only (Headteacher and/or DSL or deputy DSL) will have completed the relevant information gathering and due consideration process appropriate to their level of skill and expertise, prior to seeking further advice or making a referral.)

The LA children's social care services, LADO and NSPCC contact details will be displayed throughout the school for ease of reference for the school community and children.

The name of the school's DSL and their Deputy will be clearly advertised throughout the school, with a statement explaining the school's role in referral and monitoring.

The name of the Director of Education will be clearly displayed in the school office for school staff.

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Equality statement

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

We give special consideration to children who:

- Have special educational needs or disabilities or certain health conditions.
- Those who are educationally disadvantaged.
- Are young carers.
- Are looked-after or previously looked after.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse.
- Are at risk of honour-based abuse including FGM and/or forced marriage, sexual exploitation, or radicalisation.
- Appear vulnerable to criminal exploitation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are missing or absent from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

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Roles and responsibilities

School staff (including national team, volunteers, students, Trustees and ACC members)

All staff will safeguard children's wellbeing and promote their welfare: protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and by taking appropriate action to enable all children to have the best outcomes.

All staff MUST read Part 1 or Annex A (long or condensed version (for staff who do not work directly with children) and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education September 2023](#), and review this guidance at least annually. It is a recommendation from the Trust that all staff also read Part 5.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

Trustees, Director of Education, Safeguarding Manager, members of the School Leadership Teams, DSLs and their deputies, and members of the National Team should read the document in its entirety.

All staff will be aware of:

- Our systems which support safeguarding, including the child protection policy (including procedures for dealing with child-on-child abuse), staff Code of Conduct, the role and identity of the DSL and deputy/deputies, the E-safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, the school Behaviour Policy, and the safeguarding response to children who go missing from education.
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), Domestic Abuse, indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).

- Mental Health problems and how in some cases they are an indicator of the child being at risk of harm.
- The terms victim and perpetrator ensuring they recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way thus using a term that the child is comfortable with; equally for alleged perpetrator(s)/perpetrators thinking carefully about what terminology is used (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. (As a school we will decide what's appropriate and which terms to use on a case-by-case basis).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children and thus will provide a safe space for these pupils to speak out and share their concerns.
- What to look for to identify children who need help or protection.

All new staff and volunteers will receive basic safeguarding training as part of their induction and be expected to read and understand the Child Protection and Safeguarding Policy.

The section on training and the appendix of this policy outline in more detail how staff are supported to do this.

Main responsibilities of the DSL

Managing referrals *(from school staff or others from outside the school)*

- Refer all cases of suspected child abuse to children's social care services.
- Refer all safeguarding concerns involving adults (staff & volunteers) to the LADOs.
- Refer an individual to the Disclosure and Barring Service (when a staff member has harmed or poses a risk of harm, to a vulnerable adult or child, or has been dismissed for harming a vulnerable adult or child or would have been dismissed had they not left employment). **This is a legal duty and the school will work with the Safeguarding Manager and Director of Education in completing and making the referral.**
- Refer to the Teaching Regulation Agency (TRA) (formerly NCTLs Teacher Services or Employer Access Online Service) when checking the Teacher's Prohibition List for all teachers employed by the school and for making referrals for teacher misconduct². Teaching Regulation Agency (TRA) checks will be completed on all staff involved in teaching.
- Inform the Police (cases where a crime may have been committed) with due regard to NPCC 'When to call the police' guidance.
- Liaise with the Headteacher to inform him/her of issues especially ongoing 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.

² <https://www.gov.uk/government/collections/teacher-misconduct>

Training

Receive appropriate training every two years (or more regularly) and ensure that updates are accessed on an annual basis through the Local Authority or MAP.

Training should provide DSLs with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care.

They should:

- Understand the importance of working closely and information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- Understand and participate in the assessment process for providing early help and intervention through the MAP.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- Understand and participate in child protection conferences and reviews, including providing reports.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding policy and procedures, especially new, agency/supply and part-time staff.
- Be alert to and support the specific requirements of children in need, those with educational needs, looked after children, children with SEND, children with a social worker, children with certain health conditions and young carers.
- Attend relevant and refresher training courses, including online safety.
- Organise child protection induction, and update training annually for all school staff.
- Encourage a culture among all staff of listening to children and taking account of their wishes and feelings, and any measures the school may put in place to protect them.
- Ensure that at least one interview panel member of each interview has undertaken Safer Recruitment training.

Raising awareness

- Ensure the school's policies are known and used appropriately.
- Ensure the school's Child Protection and Safeguarding policy is reviewed annually and the child protection procedures are in line with the LA, MAP, working with the ACC and Trust to achieve this.
- Ensure the Child Protection and Safeguarding Policy and procedures are available publicly, parents are aware of them and that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the local MAP to make sure staff are aware of training opportunities and the best local policies on Child Protection and Safeguarding.
- Keep written records of concerns about a child even if there is no need to make an immediate referral.
- Maintain detailed, accurate, secure written records of concerns and referrals and ensure actions are recorded and acted upon.
- Ensure that all child protection records are kept confidentially and separately from pupil records, in line with the Retaining Records Policy, and are passed on to the child's next school in a confidential and secure manner, ensuring a confirmation receipt is obtained on delivery.
- Ensure that the existence of the child protection file is marked on the pupil records.

- Ensure that any pupil with a child protection plan who is absent from the educational setting without explanation is referred to children's social care³ immediately.
- Ensure the school follows up any unexplained absences immediately and refer this to the appropriate agency (educational welfare service, social care or the police) if the child cannot be located. Ensure that the school follows local Child Missing in Education procedures.
- Encourage a culture of listening to children and taking account of their wishes and feelings, in any measures the school may put in place to protect them.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
- Ensure that the school, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- Have a good understanding of harmful sexual behaviour.
- Ensure they know and have discussed the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to inform the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search. Further information can be found in the Statutory guidance - PACE Code C 2019.
- Understand and support the school 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.
- 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.
- Understand the filtering and monitoring processes on academy devices and academy networks to keep pupils safe online.
- Provide, with the Headteacher, a termly report for the ACC.
- Provide the Trust with termly safeguarding reports.

The DSL and their deputy must undertake child protection training and training in inter-agency working every two years (or more regularly) and will attend annual refreshers provided by the LA/MAP to remain updated on policy, procedures and developing concerns nationally and regionally.

Their full responsibilities are outlined in the job descriptions of both the DSL and the Deputy DSL.

The Headteacher

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

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3.pdf

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction; and
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training, including online safety training, and updating the content of the training regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate. (See Appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the Early Years setting
- Ensuring the school has at least two emergency contact details for each pupil/student.

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Reporting and recording

It is the responsibility of all adults in school to ensure that any safeguarding concerns they may have, are reported to the DSL in school.

All staff are asked to complete a paper safeguarding form which is then passed to the DSL or DDSL the same day. In urgent cases, a staff member may ask for cover to deliver a safeguarding form.

Any urgent concerns, where a child might be at risk of significant or immediate harm must be reported immediately to the DSL (or in their absence the DDSL) and then reported in writing onto CPOMS as soon as possible within the same day or as directed by the DSL on that occasion.

All reports will include complete details of the child, any others involved and of the incident. All names will be written in full, and all people mentioned will be given their designation (i.e., "Fred, father of John"). As much as possible the language used by the child/student in any statement or allegation of abuse, will be reported and not substituted by the adult reporting.

The report will be considered a formal document and so all details must be clear so that, if referenced at a later stage, the person reading it has a clear understanding of who is involved and what occurred.

Reports may be submitted as part of legal proceedings.

Where a child/student has such a file, this will be indicated on their general pupil file.

Next steps for the concern will be followed up by the DSL and DDSL. (See referral procedures.)

Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

All students who wish to report a concern can speak to any member of staff in the academy.

Students will be asked non leading questions and reminded that information cannot be kept confidential.

Students are told who the DSL, DDSL and the roles of the pastoral team as part of their induction.

Students are reminded of our safeguarding procedures through September induction, termly safeguarding live streams and information shared in coaching time, lifeology and assemblies.

All students are reminded that our values of love, hope and trust permeate through all we do and we will support all students, no matter how small or how large their worries may be.

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Confidentiality and information sharing

Timely information sharing is essential to effective safeguarding.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe (KCSIE Sept 2023 paragraph 120) except in circumstances where damage may be done to a person or group of people; 'this includes allowing practitioners to share information without consent...' (KCSIE Sept 2023 paragraph 119). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and where appropriate the school will seek advice from Anthem Trust.

The school will ensure that all child protection records are kept confidential and only allow disclosure to those who need the information in order to safeguard and promote the welfare of children. The school will cooperate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations.

Regardless of any duty of confidentiality, if any member of staff has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the DSL (who in turn will refer immediately to the local authority children's social care) in accordance with this policy. All staff may raise concerns directly with children's social care services.

The school will ensure that a clear protocol regarding communication using walkie-talkies is established and shared with relevant staff so no compromise or detriment to any safeguarding information.

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Recognising abuse and taking action

Staff (including temporary staff), volunteers and ACC Members must follow the procedures set out below in the event of a safeguarding issue.

We choose to refer via the DSL in the majority of cases because they may have wider knowledge about the family/circumstances that is unknown to the rest of staff. This also ensures that the person responsible for Safeguarding and Child Protection has a comprehensive picture of what is happening in school.

Nevertheless, where a staff member has a concern and the DSL or DDSL cannot be located or where the staff member feels the response from the DSL/DDSL is inadequate, the staff member **MUST** refer the case into Social Care using the processes and procedures below.

If a child is in immediate danger

Early identification of abuse and neglect is vital. Staff will always speak to the DSL to escalate their concerns. **In exceptional circumstances, such as in an emergency or if they believe that a genuine concern that they have has not been appropriately addressed, they will speak directly to children's social care.**

Should the DSL or their deputy not be contactable **immediately**, make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. ***Anyone can make a referral.***

Tell the DSL as soon as possible if you make a referral directly.

If a child is in immediate danger, staff should seek assistance from a member of the senior team who will support them to contact LA MASH referral team or call 999 for a police emergency.

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If a child makes a statement or allegation of abuse to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions. Staff should not take a decision as to whether or not the abuse has taken place.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner. Reassure them that you are taking their statement or allegation of abuse seriously, will help keep them safe and that they are not creating a problem for reporting abuse, sexual violence or sexual harassment.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record and any evidence must be kept securely and handed to the DSL as soon as possible.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to

anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

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

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

All staff should report concerns on a paper safeguarding form. The information should be specific, detailed and in the words of the child. You should not ask leading question and remind the child that this information cannot be kept confidential.

Do not investigate suspicions regarding child protection issues.

Action by the Designated Safeguarding Lead – concerns about children

The action to be taken by the DSL will take into account:

- The local inter-agency procedures of the Merton Safeguarding Partnership.
- The nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to children's social care or the Police. In case of serious harm, the Police will be informed from the outset.
- The wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes.
- The wishes of the complainant's parents provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents would put a child at risk; s/he will take further advice from the relevant professionals before making a decision to disclose; and
- Duties of confidentiality, so far as applicable (and as referenced above)

Referral

If there is room for doubt as to whether a referral should be made, the DSL will consult with children's social care services on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, the DSL will make a referral without delay. If the initial referral is made by telephone, the DSL will confirm the referral in writing to children's social care services within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact children's social care services again. Should the school require further support in escalating the case then they will contact the Safeguarding Manager.

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If you discover that FGM has taken place, or a pupil is at risk of FGM

The Department for Education's *Keeping Children Safe in Education September 2023* explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs'.

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

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

Any teacher who discovers that an act of FGM appears to have been carried out on a **pupil under 18 must** immediately report this to the Police, personally. This could be that they:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

This is a mandatory, **statutory duty**, and teachers may face disciplinary sanctions for failing to meet it. (KCSIE September 2023 and Serious Crime Act 2015). Thereafter, they may discuss their concerns with the DSL.

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a pupil is *at risk* of FGM or discovers that a pupil aged 18 or over appears to have been a victim of FGM, should speak to the DSL and follow our local safeguarding procedures.

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

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

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

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

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Early help

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Any staff member who has a concern about a child's welfare should follow the referral processes.

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

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

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

Referral

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

If you make a referral directly, you must tell the DSL as soon as possible.

The local authority will make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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

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If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and ACC members can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk.

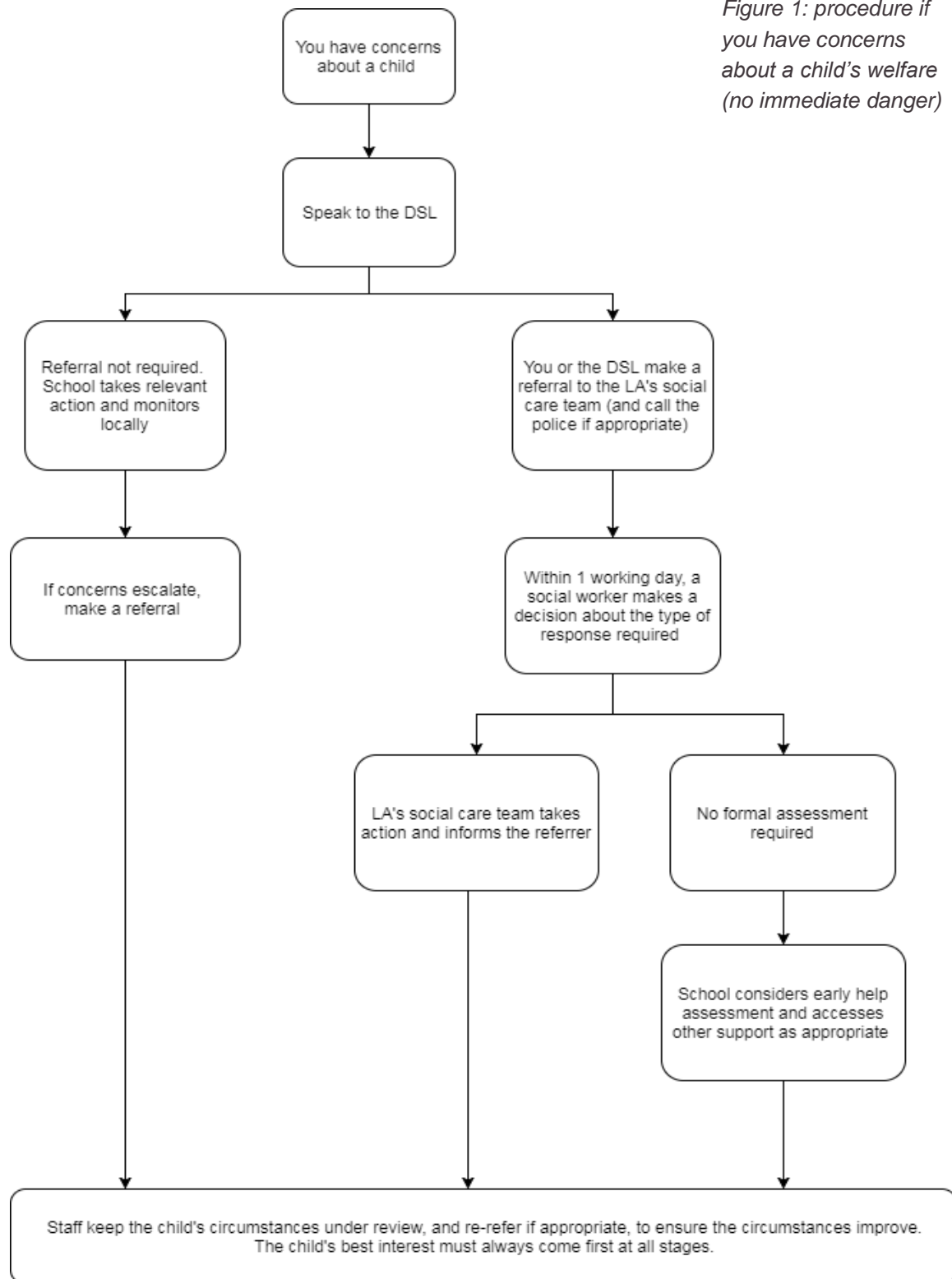
Note that this is not for use in emergency situations.

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

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

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Flowchart for procedures if you have concerns about a child's welfare (no immediate danger)



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Allegations of abuse made against other pupils (child-on-child abuse) Harmful Sexual Behaviours/Sexual Violence and Sexual Harassment

All staff should be aware that children are capable of abusing other children, should be able to identify this, be aware of the importance of their role in preventing it and know how to respond where they feel a child may be at risk. They must know to act on any concerns immediately and speak to the DSL without delay.

We recognise that even if there are no reported cases of child-on-child abuse, it may still be taking place but is just not being reported. We have a zero-tolerance approach to abuse, and it will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up' as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We recognise that the abuse can happen in or out of school, face-to-face or online and can occur simultaneously between the two; that it is more likely that girls will be victims and boys' perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our School Behaviour Policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns.

Further guidance is given in Part 5 Child on Child Sexual Violence and Sexual Harassment below.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse').
- Physical abuse which includes hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be stand alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos and/or live streams (also/previously known as sexting or youth produced sexual imagery). (See Appendix 2)
- Up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause their victim humiliation, distress or alarm. This is a criminal offence thus there is a duty to report to the police.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

Further support can be found in [UK Council for Internet Safety \(UKCIS\) Guidance: Sharing nudes and semi-nudes advice for education settings working with children and young people](#) (December 2020).

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

- You must tell the DSL and record the allegation, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved – the victim(s), the child(ren) against whom the allegation has been made and any other children affected by child-on-child abuse – with a named person they can talk to if needed, aware there may be physical and mental health implications requiring further support as well as signposting for additional support. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). School will provide support at the same time as taking any disciplinary action.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
 - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
 - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.
 - (See KCSiE 2023 Paragraph 544 for further detail)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

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



Regarding anonymity, all staff will:

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

The government's [information sharing advice for safeguarding practitioners](#) includes seven 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

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

We will create a supportive environment in school and minimise the risk of child-on-child abuse by:

- Being proactive with action to minimise the risk of child-on-child abuse, and creating a supportive environment where victims feel confident in reporting incidents.
- Challenging any form of derogatory or sexualised language or behaviour between peers including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys; listening for conversations; being observant about any behavioural changes.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils know they can talk to staff confidently and confidentially by sharing information in Safeguarding Live Streams and as part of the Lifeology curriculum.
- Being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Supporting children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- Dealing with any child-on-child abuse in a timely manner.

Informing parents/carers

Parents/carers will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the LADO, the Police and/or the Headteacher before discussing details with parents/carers.

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

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

External agencies

Whether or not the school decides to refer a particular complaint to children's social care services or the police, the parents and pupil will be informed of their right to make their own complaint or referral to the children's social care services or the child protection unit of the Police and will be provided with contact names, addresses and telephone numbers, as appropriate.

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Specific safeguarding concerns

All staff should have an awareness of the safeguarding issues that can put children at risk of harm. Behaviour linked to issues such as drug taking, alcohol abuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) put children in danger. We will take into account the specific needs of children/young people in difficult circumstances and will ensure that their additional needs are taken into account and dealt with according to the local authority arrangements and KCSIE September 2023.

Such circumstances include:

- Child abduction and community safety incidents.
- Children and the court system.
- Children with family members in prison.
- Child criminal exploitation/child sexual exploitation.
- County lines.
- Cybercrime.
- Domestic abuse.
- Homelessness.
- Modern slavery and the National Referral Mechanism.
- So-called 'honour-based' abuse (HBA) preventing radicalisation.
- Child-on-child abuse.
- Sexual violence and sexual harassment between children in schools.

See Appendix 2 below for more details.

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Children with special educational needs, disabilities or certain health conditions

Children with special educational needs (SEN) and disabilities or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers. These challenges 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 or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying (including online), grooming and radicalisation without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges.

To this end, we will ensure there is extra pastoral and communication support for children with SEN, disabilities and certain health conditions. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

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Children with a social worker

It is recognised that when a child has a social worker, it is an indicator that they are more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making decisions in the best interests of their safety, welfare and educational outcomes.

Details of student attendance, punctuality and progress will be shared with the social worker as requested.

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Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, Lynda Haughton, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

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The use of 'reasonable force' in schools and colleges

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people.

The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, we will, in considering the risks, carefully recognise the additional vulnerability of these groups (under the Equality Act 2010) in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

Further detail is found in the School Behaviour Policy.

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Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors in the wider community outside the school and/or can occur between children outside the school.

All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. They should consider the context within which such incidents and/or behaviours occur. Assessments of children should consider whether wider environmental factors/risks/issues are present in a child's life and whether they are a threat to their safety and/or welfare. Details of the school's key contextual issues are shared with the Trust via the Strategic Safeguarding Group.

The contextual issues which affect our school include, but are not limited to, mental health, children missing or absent from education, child criminal exploitation, child on child abuse, neglect, domestic violence and children with a family member in prison.

(Children's social care assessments should consider such factors, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.)

Further information can be found in Appendix 2 below; KCSIE September 2023 Part 1, Annex B, Working Together to Safeguard Children (2018, updated 2020) and

www.contextualsafeguarding.org.uk

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Safeguarding concerns about a staff member, supply teacher, volunteer or contractor

At St Mark's Academy we recognise the possibility that adults working in the school may harm children, including ACC members, volunteers, supply teachers, agency staff or contractors. If you have concerns about any adult in the school, speak to the Headteacher without delay, in their absence the DSL.

Where there are concerns about the Headteacher, this should be referred to the Director of Education who MUST inform the Chief Executive Officer of the Trust immediately.

You can also discuss any concerns about any staff member, volunteer or contractor with the DSL.

The Headteacher/Director of Education/DSL will then follow the procedures set out in the Trust Allegations Against Staff or Low-Level Concerns Policy, as appropriate.

If a staff member feels unable to raise their concerns/issues with their Headteacher then report it directly to the LADO; if they feel that their genuine concerns are not being addressed, they must refer to the Whistleblowing Policy and/or contact the trust or the NSPCC Whistleblowing advice line directly.

If you receive an allegation relating to an incident where an individual or organisation was using the academy premises for running an activity for children, follow our Trust safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation. (KCSiE 2023 paragraph 377)

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Managing safeguarding concerns and allegations about staff

The school has policies and procedures (see above list) for dealing with allegations against staff (including supply staff, volunteers and contractors) that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. These procedures follow the DfE guidance Keeping Children Safe in Education September 2023, and should be used where an allegation is made about a person working in a school/college that provides education for children under 18 years of age, including members of staff, supply staff, volunteers or contractors, that they 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 may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside the school.

(These are also known as the harm test)

All allegations will be reported to the Headteacher immediately, or to the Chair of the ACC and the Director of Education in the initial stages where the Headteacher is the subject of the allegation.

In the cases of all allegations against staff or volunteers the Headteacher will then inform the relevant Director of Education who will escalate this to the CEO, the COO and the Head of HR at the Trust as a serious reportable issue.

Allegations must not be shared with other staff, parents or pupils.

On receiving an allegation, the Headteacher has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the LADO (see below).

When a person reports an allegation of abuse against a member of staff or volunteer at the school, which appears to meet the above criteria, the Headteacher will immediately contact the LADO before further action is taken. Where there is any doubt as to whether the criteria have been met the LADO must be informed.

Before contacting the LADO, schools should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

Where an allegation is made about a supply teacher, whilst the school is not the employer, they should ensure that all allegations are dealt with properly. In no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. (KCSiE September 2023 Paragraphs 373-376).

The accused person will be informed of the allegation as soon as possible after the designated officer has been consulted. Appropriate support and a representative will be provided to keep the accused person informed of the progress of the case as appropriate.

Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure:

- The safety and welfare of the pupils or pupil concerned; and
- The need for a full and fair investigation.

Detailed guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm, or of allegations of harm toward a pupil. This guidance is contained in the Staff Code of Conduct, and the Staff Handbook/Induction Handbook if the school has one.

Ceasing to use staff

If the school ceases to use the services of an accused member of staff (or an ACC member or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used. A referral to the Disclosure and Barring Service (DBS) will be made. If the staff member is a teacher, a referral may/will be made to both the Disclosure and Barring Service and the Secretary of State via the Teaching Regulations Agency (TRA) by the school with the support of the Director of Education/Safeguarding Manager if required. Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the ACC and the Trust without delay.

Resignation

If a member of staff (or ACC member or volunteer) tenders his/her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the school.

Resignation will not prevent an investigation or the conclusion of an investigation and may prompt detailed referrals being made to the DBS and/or the TRA.

Criminal proceedings

The school will consult with the LADO following the conclusion of a criminal investigation as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed.

Record keeping and retention of documentation

Details of **substantiated** (sufficient evidence to prove the allegation) and unsubstantiated (insufficient evidence to prove or disprove the allegation) allegations will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of ten years from the date of the allegation, if this is longer.

Substantiated allegations will be referred to in references.

Unsubstantiated allegations will not normally be referred to in references requests, but if the Headteacher is explicitly requested, s/he will seek the advice of the LADO before responding to the request.

Allegations that are found to have been **malicious** (sufficient evidence to prove the allegation and there has been a deliberate act to deceive), **false** (sufficient evidence to disprove the allegation) or **unfounded** (where there is no evidence or proper basis which supports the allegation being made) will be removed from the employee's records.

Malicious and unsubstantiated allegations made by students/pupils

Where an allegation by a student/pupil is shown to have been deliberately invented or malicious, the Headteacher will consider whether to take disciplinary action in accordance with the School Behaviour Policy. The LADO will refer the matter to children's social care to determine whether the child is in need of services, or to consider if the child might have been abused by someone else. Schools may choose to note this malicious allegation on the student's/pupil's record for information only, where a pattern of malicious referrals might be made. (See KCSIE September 2023, Part 4 for further guidance).

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Low Level Concerns about staff behaviour

Concerns may be graded low level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff Code of Conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating pupils.

If the concern has been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:

- Directly to the person who raised the concern unless it has been raised anonymously.
- To the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

The school will work to ensure a culture of openness, trust and transparency so staff feel encouraged and feel confident about what appropriate behaviour is, about confidentially sharing low level concerns, addressing unprofessional behaviour and/or are able to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be reported to the DSL (who will inform the Headteacher) or the Headteacher (or Director of Education if about the Headteacher) and recorded in writing, (KCSIE 2023 paragraph 72/73) including:

- Name* of individual sharing their concerns.
- Details of the concern.
- Context in which the concern arose.
- Action taken.

*(*if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)*

The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL (and it should be explained to staff how they will work together in the process/procedure for confidentially sharing low-level concerns).

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. School should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment (see above).

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If there is any doubt about the low-level concern and whether it meets the threshold or not the school should contact the LADO.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

If the records' review identifies that there are wider cultural issues within the school that enabled the behaviour to occur, we will review/revise our policies or processes or deliver extra training to minimise the risk of it happening again.

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Whistleblowing

Anthem recognises that the reporting a concern can be a difficult decision to take, not least because of the fear of reprisal. Anthem aims to encourage openness and will support employees who raise genuine concerns in good faith under the Whistleblowing Policy, even if the concern turns out to be unfounded.

Any staff who threaten or retaliate against whistle-blowers in any way will be subject to disciplinary procedures.

We will respect the employee's confidentiality as far as we possibly can but there may be times when we cannot guarantee this, for example if there has been a criminal offence, a child protection or safeguarding issue.

Employees are encouraged to report their concerns by emailing the dedicated whistleblowing mailbox: whistleblowing@anthemtrust.uk

Employees may also contact the Chief Operating Officer or the Chair of the Audit & Risk Committee. Their contact details are available from <https://www.anthemtrust.uk/get-in-touch>

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – lines are available from 8am to 8pm, Monday to Friday and email: help@nspcc.org.uk.

More information about whistleblowing can be found in the Whistleblowing Policy and at <https://www.gov.uk/whistleblowing>

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Safer recruitment

To ensure that children are protected whilst at this school, we will ensure that our staff and volunteers are carefully selected, screened, supervised and trained.

We accept that it is our responsibility to follow government guidance regarding safer recruitment.

We will ensure that the checks will be made in conjunction with the relevant agencies including the Teaching Regulation Agency (TRA), the Disclosure and Barring Service (DBS) and the Home Office.

The checks include:

- Identity, including name and current address.
- Right to work in the UK.
- Qualifications.
- Police checks through the DBS (free for volunteers KCSiE 2023 footnote 102)
- Children's barred list.
- Overseas checks.
- References (in accordance with the Safer Recruitment Policy).
- Medical Fitness.
- Prohibition from teaching.
- Prohibition from Management (where applicable to the role).
- Relevant criminal records checks/ professional standing letter from professional regulating authority in the country in which the applicant has worked, for overseas applicants.
- Childcare (Disqualification) Regulations 2009 (for staff member but not "disqualification by association).
- Online search on shortlisted candidates (shortlisted candidates to be informed that these will be carried out as part of the due diligence process)

These checks will be made in accordance with the Safer Recruitment Policy. They will be made in accordance with the role applied for.

For overseas checks post EU exit 1st January 2021, see KCSiE 2023 Part 3 and <https://www.gov.uk/guidance/recruit-teachers-from-overseas>.

All checks made will be recorded on the school's Single Central Record (also known as the Register) in line with the guidance. Any other checks (medical, references) are not necessarily required to be recorded but may be at the discretion of the organisation. All the checks however

must be maintained in the staff personnel files and appropriately recorded as being so (e.g., on a staff personnel file checklist).

Full details of our safer recruitment procedures are set out in the school's Safer Recruitment Policy.

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E-Safety/online safety at home

We recognise that technology is a significant component of many safeguarding and wellbeing issues and can provide the platform for harmful and inappropriate online material. We endeavour to do everything possible to address this including:

- Having robust processes, including filtering and monitoring systems, in place to ensure the online safety of pupils, staff, volunteers and ACC members.
- Protecting and educating the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Setting clear guidelines for the use of mobile phones for the whole school community.
- Establishing clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The areas of risk are categorised into four areas:

- Content: being exposed to illegal, inappropriate or harmful material.
- Contact: being subjected to harmful online interaction with other users, and
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

With a view to this, we will:

Ensure that appropriate filters and monitoring systems are in place at school in order to reduce the risk when using the school's network, and regularly review these.

Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards.

Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role.

Make sure that all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners.

Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.

We are aware of many children having unlimited and unrestricted access to the Internet via various mobile phone networks. To minimise inappropriate use, as a school we use a rigorous filtering and monitoring system that alerts the Safeguarding Team to any concerns with key term search logs or images. All staff are also trained to monitor what is happening on screens.

(Further advice for appropriateness of filters, including for Prevent duty, can be found in KCSIE September 2023, paragraphs 135-148 and UKSIC: appropriate filtering and monitoring).

We will also ensure that:

Pupils/students are taught about safeguarding, including online safety in school and when online at home ensuring they are aware of how to report anything deemed inappropriate.

Parents are educated about online safety through the school website, school communications and parents evenings ensuring they are aware of how to report anything deemed inappropriate. We will reinforce the importance of online safety making parents aware of what we ask children to do online e.g. sites they need to visit or who they will be interacting with online.

Staff are trained annually on safe internet use and online safeguarding issues (e.g., cyberbullying, online radicalisation).

<https://www.gov.uk/guidance/safeguarding-and-remote-education>

Full details are set out in the Trust E-Safety Policy and in the government guidance document

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

KCSiE September 2023: Paragraph 138 and Annex B, Additional advice and support (P158-160) for Online Safety contains full guidance, support, information and resources to support school, DSL and leadership teams in this area.

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Mobile phones and cameras

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

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

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

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Record-keeping

We will hold records in line with our Retaining Records Policy.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

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

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

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

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

- Five days for an in-year transfer.

or

- Within the first five days of the start of a new term.

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

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

Information is shared through a secure platform, such as egress, when information is to be shared with other agencies.

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Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding partnership, national guidance/initiatives and will have regard to the Teachers' Standards. The mandatory training for staff is the child protection policy, the behaviour policy, the staff behaviour policy (code of conduct), the children missing education guidance and the role and identity of the DSL and the deputy DSLs. Staff are expected to have read these documents.

The DSL will plan the training cycle so that it covers all aspects of child protection and safeguarding according to the school's contextual needs and in line with the whole-Trust safeguarding approach and training content overview.

All staff will have training on online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.

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

Staff will also receive regular safeguarding and child protection updates (e.g. through emails, e-bulletins, briefings and staff meetings) as required, but at least annually.

Volunteers, agency/supply staff and contractors working in school will receive appropriate training.

All staff of the Trust, including Trustees, members of the national team, Safeguarding Manager and Director of Education will undertake training relevant to their roles and responsibilities.

The DSL and DDSL

The DSL and DDSL will undertake child protection and safeguarding training at least every two years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

Trustees and ACC Members

All Trustees and ACC members will receive training about safeguarding and child protection (including online) at induction, which is updated regularly, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge. It is also so that they can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

Staff who have contact with pupils and families

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

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Prevention

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

The school will therefore:

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with children, e.g., through safety questionnaires, participation in anti-bullying initiatives, participation in the UNICEF Rights Respecting Schools Award or other effective ways of teaching children about their rights (United Nations Convention on the Rights of the Child).
- Encourage self-esteem and self-assertiveness, through the curriculum as well as relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Supporting families through Early Help initiatives.
- Provide explicit teaching on safeguarding, Equalities and British Values, which is mapped throughout the curriculum.
- Provide specific teaching on Relationships Education, Relationships and Sex Education and Health Education as outlined by the government requirements making this compulsory in September 2020.

<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

(See Public Health England: Rise Above for resources and KCSiE September 2023 Paragraphs 129-134)

As well as ensuring that we address child protection concerns, we will also ensure that children who attend the school are kept safe from harm whilst they are in our charge.

To this end, this policy must be seen in light of the following school's policies and procedures:

- Anti-bullying Policy: the school will also ensure that bullying is identified and dealt with promptly. Sexualised behaviour, or bullying that is homophobic, trans gendered or gender prejudiced in nature, or where there appear to be links to domestic abuse in the family home will be addressed via local child protection procedures. Concerns about forced marriage and honour-based abuse will be addressed via local child protection procedures.
- Safer Recruitment Policy.
- Staff Code of Conduct.
- Racist & Discriminatory Incidents.
- Confidentiality and Data Protection.
- Behaviour Policy (including rewards, sanctions and the use of exclusion) and the school rules.
- Health and Safety Policy.
- Physical intervention/Restraints.
- Allegations made against members of staff.
- Low-Level Concerns Policy.
- Tackling Extremism and Anti-Radicalisation (PREVENT) Policy.
- Missing Pupils Policy.
- Looked-After Children Policy.
- Attendance and Punctuality Policy.
- Registration of Pupils Policy.
- E-Safety Policy.
- Curriculum Policy.

That any harm caused by other pupils can be minimised, we will pay particular attention to:

- Personal, Social and Health Education, Relationships Education and Relationships and Sex Education: child protection issues will be addressed through the curriculum as appropriate. Further details can be found in Relationships and Sex Education Policy.

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Alternative Provision

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. (KCSiE 2023, paragraph 326-327)

Schools should obtain written confirmation from the alternative provider that appropriate safer recruitment 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 and agency staff.

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Adults who supervise children on work experience

Schools organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm.

Consideration must be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations would include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- Unsupervised themselves; and
- Providing the teaching/training/instruction frequently (more than three days in a 30-day period, or overnight).

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. If so, the school will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person and receive confirmation in writing.

Schools are not able to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience.

If the activity undertaken by the child on work experience takes place in a 'specified place', such as a school or college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity. In these cases, and where the child is 16 years of age or over, the work experience provider should consider whether a DBS enhanced check should be requested for the child/young person in question. (DBS checks cannot be requested for children/young people under the age of 16).

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Children staying with host families (homestay)

Schools quite often make arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related i.e., as part of a foreign exchange visit or sports tour, often described as 'homestay' arrangements (see Annex D of KCSIE September 2023 for further details).

School should:

- Consider the suitability of the adults in the host families.
- Obtain a DBS enhanced certificate with barred list information for any adults in the host home. (Where these are volunteer hosts, the check can be obtained free of charge by the school).

NB: Where there are 16-18-year-olds also living in the house, schools can obtain an enhanced DBS check for these but cannot request a Barred list check.

Where schools arrange overseas homestays for their own students, they should liaise with their partner schools abroad to establish a shared understanding of the arrangements in place before and during the visit. They should be satisfied that the arrangements are appropriate and sufficient to safeguard their pupils. The school retains the safeguarding responsibility for their students.

Where 'homestays' extend to 28 days or more for a child aged under 16 (under 18 if the child has disabilities) this may amount to 'private fostering' (Children's Act 1989) and must be treated accordingly.

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Private fostering - LA notification when identified

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements.

The school must be clear who has parental responsibility.

The DSL will speak to the family of the child involved to check that they are aware of their legal duty to inform the LA at least six weeks prior to the arrangement starting (it is a criminal offence not to do so).

The school itself has a mandatory duty to inform the local authority of the private fostering arrangements, and thus allow the local authority to check that the arrangement is suitable and safe for the child.

Privately fostered children are a potentially vulnerable group who should be monitored by the LA especially if they have come from another country or could be affected by abuse, neglect, trafficking, CSE or modern-day slavery.

(A comprehensive guidance on the circumstances in which private fostering may arise can be found at DfE statutory guidance *Children Act 1989 Private fostering*).

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NSPCC

- The school will clearly advertise the NSPCC contact and Child Line details with a statement about their statutory powers to take action to safeguard children.
- The school will clearly advertise the NSPCC dedicated helpline for reporting concerns/suspensions regarding FGM and Gangs.
- The school will clearly advertise the NSPCC Whistleblowing advice line which provides free advice for professionals who wish to raise concerns about how child or young adult protection issues are being handled in their own or other organisations.

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School premises

The school will take all practicable steps to ensure that school premises are as secure as circumstances permit, conducting regular risk assessments and maintaining a log of risk assessments, and other health and safety checks. All reportable incidents will be reported to the Trust promptly and health and safety processes followed.

Visitors and parents are not allowed into school buildings without a visitor's badge and will be accompanied by a member of staff whilst inside the building(s). Visitors wishing to enter a school building must sign in on arrival and sign out again on departure. Un-badged and unaccompanied

visitors inside buildings will be challenged by a member of staff and escorted to the office to complete the signing-in procedures. Those visiting the school site to collect or drop off children or to watch matches or concerts are restricted to appropriate areas and will be directed as to which locations are available to them.

Schools will check the identity of all new agency staff on arrival (by requesting photo id) and ensure the person presenting themselves for work is the same person that the agency has provided vetting checks for.

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Before and after school activities*

Where permission has been given for the use of school premises to bodies (such as sports clubs) to provide out-of-school-hours activities, Anthem Schools Trust expects that it will ensure that these bodies have appropriate Child Protection and Safeguarding policies and procedures (including appropriate police checks) and that there are arrangements in place to link with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with these bodies.

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Contracted services*

Where the school contracts its services to outside providers, Anthem Schools Trust expects that it will ensure that these providers have appropriate Child Protection and Safeguarding policies and procedures, and that there are arrangements in place to link with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the provider. (See also the Trust Safer Recruitment Policy).

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Lettings*

As part of the school's letting procedures, all reasonable checks will be made to ensure hirers will not be using the school premises to promote any extremist views. The school will follow guidance set out in Tackling Extremism and Anti-Radicalisation (Prevent) and Letting policies.

*The academy will follow safeguarding procedures and inform the LADO if there is an allegation of an incident happening while an individual or organisation is using the academy premises to run activities for children

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Monitoring and evaluation of safeguarding procedures

Any serious child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Director of Education and the Trust. In addition, the DSL will monitor the operation of this policy and its procedures and will make a termly report to the ACC and termly reports to the Trust.

The Trust will undertake an annual review of this policy and how their duties under it have been discharged. They will ensure that any deficiencies or weaknesses with regard to child protection arrangements at any time are remedied or reported without delay.

Prior to any review of the policy, feedback will be sought from the Director of Education, Safeguarding Manager, ACC Safeguarding Champion, student school council, pupils, staff and parents on the effectiveness of the policy.

The Anthem Safeguarding Forum, formed of the Safeguarding Manager, the Secondary DSLs and the CEO meet three times a year to review the progress of child protection and safeguarding against the action plan.

The Trust will undertake an annual safeguarding review to monitor policy into practice. The findings will be shared with the Trustees, the Director of Education, the Anthem Safeguarding Forum and the schools. The Trust will ensure, through the Safeguarding Manager, that all actions arising from the review are addressed appropriately and in a timely manner.

Staff should receive training on how to identify vulnerable learners and understand that there may be additional safeguarding vulnerabilities for pupils with SEN and disabilities (SEND), and certain health conditions and how those barriers can be overcome. *Safeguarding disabled children, practice guidance 2009.*

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Additional safeguarding information

There are three appendices attached to this policy which supplement the information in this policy, they are:

- Appendix 1: Types of abuse and neglect.
- Appendix 2: Specific contextual safeguarding issues.
- Appendix 3: Documents used to report, record and refer.

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Links with other policies

This policy links to the following policies and procedures:

- Anti-bullying (which includes Racist issues)
- Attendance
- Behaviour (which includes Positive handling)
- Concerns and Complaints
- Curriculum including PSHE and RSE
- Exclusions
- First Aid
- Health and Safety
- Induction
- Low-Level Concerns Policy
- Allegations against staff
- Managing Medicines Policy
- E-Safety
- Privacy notices
- Risk Management
- Safer Recruitment
- Relationships and sex education and health education

- Staff Code of Conduct
- Whistleblowing

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Additional contact information

NSPCC helplines

Main contact: 0808 800 5000 (help@nspcc.org.uk)

ChildLine: 0800 1111

FGM direct line: 0800 028 3550

Gangs direct line: 0808 800 5000

Whistleblowing advice line: 0800 028 0285

Forced Marriage Unit

020 70080151 (fm@fco.gov.uk)

Tackling Extremism and Radicalisation (Prevent)

counter.extremism@education.gsi.gov.uk

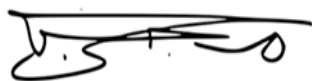
020 7340 7264

This Policy was evaluated and approved by the Trustees of Anthem Schools Trust in September 2023. This policy will be reviewed annually.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education September 2023.

Date reviewed: August 2023

Signed by:

A handwritten signature in black ink, appearing to be 'M. Ojja'.

Mohsen Ojja, Chief Executive, Anthem Schools Trust

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Appendix 1: Types of abuse and neglect (see KCSiE 2023 (Part 1))

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

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying.), causing children frequently to feel frightened or in danger.
- Exploitation or corruption of children including CSE/CCE.
- Psychological abuse including radicalisation.
- Honour-based abuse used to control behaviour within families to protect perceived cultural or religious beliefs or honour, including forced marriage and FGM.

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

The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).
- Female genital mutilation (FGM) Appendix 2.
- Child Sexual Exploitation (CSE) Appendix 2.
- Forced marriages.

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

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

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

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

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

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Appendix 2: Specific contextual safeguarding issues

Mental Health

All staff should also be aware that mental health problems could, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. School staff are not expected or trained to diagnose mental health conditions or issues but are well placed to observe children day-to-day and may notice behaviours that may be of concern suggesting they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this Child Protection Policy and speaking to the DSL or a deputy.

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

Children who are absent from education

A child being absent from education, particularly repeatedly is a potential indicator of abuse or neglect and may also raise concerns about other safeguarding issues; such children are at risk of being victims of harm, sexual and criminal exploitation or radicalisation and to help prevent the risks of going missing in future.

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

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

In response to the guidance in Keeping Children Safe in Education (2023) the school has:

- Staff who understand what to do when children do not attend regularly.
- Appropriate policies, procedures and responses for pupils with unauthorised absence and/or who are absent from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - Leave school to be home educated.
 - Move away from the school's location.
 - Remain medically unfit beyond compulsory school age.
 - Are in custody for four months or more (and will not return to school afterwards); or

- Are permanently excluded.

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

The school will follow up with parents/carers where pupils are not at school and thus need to ensure they have provided two up to date contact numbers. The school will inform the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

See attendance policy, DfE: Children missing education: statutory guidance for local authorities, Sept 2016 and [Working together to improve school attendance \(Sept 2022\)](#)

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 (male or female) 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 sexual identity, cognitive ability, learning difficulties, communication 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 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.

Staff should be aware of the indicators of and range of risk factors for CSE, CCE, Gang involvement and County Lines, as they may signal that children are at risk from or are involved with serious violent crime.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual/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. It does not always involve physical contact; it can occur through the use of technology. (Child Sexual Exploitation February 2017)

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

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

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

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

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions e.g., Money, clothes, mobile phones etc.
- Associating with other young people involved in exploitation.
- Relationships with controlling or significantly older individuals or groups, (having older boyfriends or girlfriends).
- Isolation from peers/social networks.
- Excessive receipt of texts/phone calls (unknown adults or peers).
- Concerning use of internet or other social media.
- Suffering from sexually transmitted infections or becoming pregnant.
- Displaying inappropriate sexualised behaviour.
- Evidence or suspicions of physical or sexual assault.
- Suffering from changes in emotional wellbeing, including self-harm.
- Increasing secretiveness around behaviours.
- Misusing drugs and/or alcohol.
- Going missing for periods of time, or regularly coming home late.
- Regularly missing school or education, or not taking part in education.

Potential vulnerabilities

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Sexual identity.

More information can be found in: [Child sexual exploitation: Definition and a guide for practitioners \(DfE 2017\)](#)

Child criminal exploitation

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

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Indicators of criminal exploitation can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Missing for periods of time or regularly come home late; and
- Regularly missing school or education or who do not take part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. (See KCSIE Sept 2023 Annex B)

Domestic abuse

The Domestic Abuse Act April 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- Physical or sexual abuse.
- Violent or threatening behaviour.
- Controlling or coercive behaviour.
- Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- Psychological, emotional or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

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

For secondary schools: Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
- Being unexpectedly absent from school.
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

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

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

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

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

Checking the identity and suitability of visitors

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

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

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

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

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

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

Non-collection of children

If a child is not collected at the end of the session/day, we will:

If a child is not collected at the end of the session/day, we will:

Contact the parent If contact with the parent cannot be made, we will contact the emergency contacts provided by the parents and listed on SIMS

We will keep the child onsite supported by the pastoral team for up to an 45minutes

If contact cannot be made with a parent or emergency contact after this this, the child will be taken home by two members of the pastoral team.

If a parent or responsible adult is not at home, we will consider making contact with social care and/or the police.

Information will be recorded on CPOMS

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

A missing pupil during the normal school day may be defined as:

“a pupil who has registered at either the morning or afternoon registration slot, but fails to go to class or a known activity and whose whereabouts cannot be accounted for.”

A number of routine checks are made before declaring a pupil “missing.” These include:

- Asking pupils-with suggestions being followed up
- Referring to creative arts rotas and school library
- Checking with the Office/emails for medical appointments etc.
- Checking emails from colleagues who are undertaking school trips/fixtures during school time • Check with the Office that a pupil has not signed out for an appointment
- If the pupil cannot be accounted for then a member of SLT will decide upon the next course of action.

Action in the event of a pupil being declared “missing” If routine checks do not result in locating the whereabouts of the pupil, a member of the SLT and /or DSL will organise a co-ordinated and thorough search of school buildings and grounds, ensuring that any area searched and found clear is reported to an established incident control room to avoid unnecessary duplication of search areas. If a search does not reveal the pupil’s whereabouts, parents or guardians will be contacted and alerted to the situation. If they do not have any further information about the pupil’s whereabouts, the following actions will be taken:

- Inform the principal
- If the child is not found within 30 minutes inform parents
- Inform school safety officer and inform them of the situation and take advice on the next course of action
- Ensure that the incident is written up under the pupil records and logged on their chronology
- Relevant staff including the DSL will review the incident and take any further action according to the perceived needs of the pupil. If this amounts to a child protection concern the appropriate child protection protocols will be observed and followed.

Actions to be followed by staff once the pupil is found If the pupil has been found and is injured but the injuries are not serious, First Aid should be given. If the injuries are thought to be serious the emergency services should be called. If a pupil who was thought “missing” but has been found unharmed, but is clearly “upset or “troubled” then the following procedures will be followed:

- Inform parents and staff immediately
- Talk to, take care of and, if necessary, comfort the pupil to establish why they went “missing”
- Hand over the pupil to the appropriate person for further action
- If a pupil has been found “missing” because they have failed to observe the School’s rules on registration procedures then disciplinary action may be considered.

Sharing of nude and semi-nude images and/or videos and/or live stream (‘sexting’)

Your responsibilities when responding to an incident

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

You must not:

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

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

Initial review meeting

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

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

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

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

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through our community support officer or if they are absent, through calling 111. In an emergency, 999 will be called.

Recording incidents

All incidents of sharing of nude and semi-nude images and/or videos, and the decisions made in responding to them, will be recorded in line with the school's record-keeping arrangements.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nude and semi-nude images and/or videos:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nude and semi-nude images and/or videos is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. This offence comes under the Voyeurism (Offences) Act 2019. Anyone of any gender, can be a victim.

Appendix 3: Documents used to report, record and refer

- All staff and visitors to record safeguarding concerns on the Safeguarding Concern Form
- Forms should be delivered directly to the DSL or deputy DSL's

| | | | |
|---|--|-----------------|--|
| Student Name | | Date | |
| Staff member reporting concern | | Time of concern | |
| <p>Concern (Please describe as fully as possible using the student's language where possible)</p> | | | |
| <p>Signature:</p> | | | |

| Referral TAKEN by: | | |
|--------------------|------------|--------------|
| Name: | Job Title: | Agency/Team: |
| Date of Referral: | Time: | Telephone: |

| 1. Details of Practitioner MAKING this REFERRAL | | |
|---|------------|-------------------|
| Name of Referrer: | Job title: | |
| Agency: | Address: | Post Code: |
| Tel/Mobile: | Email: | Date of Referral: |

| 2. CHILD/YOUNG PERSON DETAILS (add any additional names on separate sheet) | | | | | | |
|--|------------|-----|---------|-----|-----------------------|--------------------------|
| Last Name | First Name | Age | DOB/EDD | M/F | Ethnicity (see code)* | 1 st Language |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| Address(es): | | | | | Post Code(s): | |
| Tel/ Mobile: | | | Email: | | | |

* Ethnicity Codes on supporting Guidance sheet

| 3. CHILD/YOUNG PERSON'S PRINCIPAL CARERS | | | | | | |
|--|------------------|-----------------------|--------------------------|-----|---------------|-----------------------|
| Carer Last Name | Carer First Name | Relationship to child | Parental Responsibility? | M/F | DOB/Age | Ethnicity (see code)* |
| | | | | | | |
| | | | | | | |
| Give carer address(es) here if different from the child's: | | | | | Post Code(s): | |
| Tel/Mobile: | | | Email: | | | |

| 4. OTHER HOUSEHOLD MEMBERS or SIGNIFICANT PEOPLE IN THE CHILD/YOUNG PERSON'S LIFE (where known) | | | | | | |
|---|------------|-----|---------|-----|-----------------------|-----------------------|
| Last Name | First Name | Age | DOB/EDD | M/F | Ethnicity (see code)* | Relationship to child |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| Are there any communication/interpreting needs for the child and/or family? | | | | | | |
| Does the child and/or family have a disability or special needs? | | | | | | |

| 5. Other professionals involved (to include GP and school details) | | | | | |
|--|-------------|-----------|-------------|---------|------------------|
| First Name | Family Name | Job Title | Team/Agency | Address | Telephone/Mobile |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

| | | | | | | |
|--|---------------|--------------------------|-----------------------|--------------------------|-------------------|--------------------------|
| 6. Has there been previous statutory, specialist or targeted involvement? | | | | | | |
| Children's Social Care | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known | <input type="checkbox"/> |
| Child and Adolescent Mental Health Service CAMHS | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known | <input type="checkbox"/> |
| Special Educational Needs or Disability | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known | <input type="checkbox"/> |
| Education Welfare Service | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known | <input type="checkbox"/> |
| Specialist Health | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known | <input type="checkbox"/> |
| Adult Services – (Health /Substance Abuse /Disability /Social Services / Housing) | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known | <input type="checkbox"/> |
| Youth Justice Service | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known | <input type="checkbox"/> |
| Police/Probation/ | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known | <input type="checkbox"/> |
| Other | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Not Known | <input type="checkbox"/> |
| 7. Has a common shared assessment (CAF or CASA) been completed? | | | | | | |
| No <input type="checkbox"/> Yes <input type="checkbox"/> If yes, please attach | | | | | | |
| CAF (Common Assessment Framework); CASA (Common and Shared Assessment) | | | | | | |
| 8. Reason for Referral | | | | | | |
| Identify whether any of the following Trigger Trio apply as Key contributory factors | Mental Health | <input type="checkbox"/> | Drug or Alcohol Abuse | <input type="checkbox"/> | Domestic Violence | <input type="checkbox"/> |
| Outline the safeguarding or Child Protection concerns you have for this/these children? | | | | | | |
| Do you have other concerns for this/these children? And/or for their carers parenting capacities? | | | | | | |
| What are your concerns based on? What are the risks? (What information have you gathered about the child/family). | | | | | | |
| What support has already been offered by your agency and/or other agencies and what were the outcomes in terms of helping the family? | | | | | | |
| Why are you referring for further support for the child/ren at this point? And from whom are you seeking this? | | | | | | |
| How will this intervention support the children and decrease your concerns about safeguarding risks or for the wellbeing for the child/ren? | | | | | | |
| 9. Consent/Awareness: Please note that parents /carers have to be made aware that this referral will be sent to the MASH, unless making them aware will put the child/children at immediate risk of further harm. The MASH is composed of staff from different teams and partner agencies (Health, Police, Education, others) whose collective information will help inform most appropriate response to referral: see www.merton.gov.uk/mash for further information on MASH. (Please contact MASH to discuss if you would like further guidance on this matter prior to sending this form) | | | | | | |
| Have PARENTS/CARERS given consent for this referral? | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Signature | |
| Has the child or young person given consent for this referral? | No | <input type="checkbox"/> | Yes | <input type="checkbox"/> | Signature | |
| If parent/carer have not given consent to, or have not been made aware of, this referral, please provide reason why. | | | | | | Date: |
| Copy this form securely* to Multi-Agency Safeguarding Hub (MASH) in Merton - Tel/Fax/Email options as follows: Merton MASH, Children Services, 12th Floor Merton Civic Centre, London Rd, Morden SM4 5DX Fax: 020 8545 4204, with Tel alert to: 020 8545 4226/7 Secure Email from partner agencies with a) Merton accounts, to mash@merton.gov.uk; b) other CJSM accounts, to mash@merton.gov.uk.cjsm.net Out of Hours: Tel Contact: 020 8770 5000 Email: childrens.edi@toulton.gov.uk.cjsm.net Fax: 020 8770 5900 | | | | | | |

* More on Secure Exchange from www.merton.gov.uk/mash-secure-exchange

Appendix 4: Useful statutory documents and guidance materials

- Children Missing Education 2016 - statutory guidance
- Data Protection Toolkit for Schools, openbeta, August 2018
- Government Guidance Disqualification under the Childcare Act 2006, Revised September 2018
- Guidance for Safer Working Practice for professionals working in education settings February 2022
- Improving the educational outcomes of Children in Need of help and protection – Children in Need review
- Information sharing: advice for practitioners providing safeguarding services, July 2018
- Mental health and behaviour in schools, Nov 2018
- Education inspection framework for September 2023
- Ofsted Positive environments where children can flourish, 2018 (updated October 2021)
- Ofsted School Inspection Handbook September 2023
- School Monitoring Handbook September 2022 (updated August 2023)
- Teacher status checks; information for employers (2014, updated June 2021)
- Revised Prevent duty guidance: for England and Wales (updated September 2023)
- Preventing and Tackling Bullying, July 2017
- Regulated activity with children in England
- Searching screening and confiscation, July 2022
- [UK Council for Internet Safety \(UKCIS\)](#) Sharing nudes and semi-nudes: advice for education settings working with children and young people, December 2020
- Teaching online safety in school, June 2019 (updated January 2023)
- What to do if you're worried a child is being abused, March 2015
- Home Office's Preventing youth violence and gang involvement
- Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance