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# JOYCE FRANKLAND ACADEMY, NEWPORT

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## SAFEGUARDING AND CHILD PROTECTION POLICY

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|---|--------------|
| THIS POLICY WAS APPROVED:                               | AUTUMN 2023  |
| THIS POLICY WILL BE REVIEWED:                           | AUTUMN 2024  |
| MEMBER OF STAFF WITH RESPONSIBILITY FOR LEADING REVIEW: | IAN STONEHAM |

All changes for 2023 written in Red.

| Section               | Significant Changes  |
|-----------------------|--|
| Throughout            | All references to 'Keeping Children Safe in Education' (2022) have been removed and replaced with reference to 'Keeping Children Safe in Education' (2023).  |
| 2.2 – 2.2.24          | Terminology changed – The Governing Body and Trust Board will monitor, and where required, will ensure the bullet points are in place.   |
| 2.2.5                 | Added in new information about the DSL taking lead responsibility for understanding the filtering and monitoring systems and processes.  |
| 2.2.15<br>2.2.16      | Updated to reflect the information given at induction and update training in relation to the safeguarding response to children who are absent from education.  |
|                       | Updated to reflect that online safety training for staff should include understanding the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.  |
|                       | Amended to reflect the change of wording to prolonged periods and / or on repeat occasions for children absent or missing from education.  |
| 2.2.18                | Added reference to the Low Level Concern policy.   |
| 2.2.22                | Added to the bullet points in relation to responsibilities for the Governing Board for considerations in relation to filtering and monitoring.   |
| 2.5.5 & 6             | Additional guidance around consent and the sharing of confidential information.  |
| 3.4.7                 | Additional phrase – Certain health conditions and a reminder of the Equality act and reasonable adjustments.   |
| 3.10                  | Paragraph title amended and bullet points added to reflect the changes in relation to safeguarding responses to children absent from education rather than missing from education.   |
| 3.19                  | Paragraph added in reference to forced marriage.   |
| 3.23                  | Paragraph added in reference to modern slavery.  |
| 4.3.8 & 4.3.9 & 4.5.1 | Addition of contractors.   |
| 6.21                  | Added in reference to the DfE guidance <a href="#">Keeping children safe in out-of-academy settings</a><br>Bullet point added regarding governor responsibilities to monitor actions following safeguarding audits and peer reviews. |
| 6.22                  | Bullet point added in relation to the procedures to follow if an allegation relating to an incident that happened when an individual or organisation was using academy premises for non-academy's activities.                        |
| Appendix C            | Amended dates for guidance documents where required.   |
| Appendix D            | Procedures for making an allegation updated.   |

## Introduction

Joyce Frankland Academy fully recognises the responsibility it has under Section 157 (Academies) of the Education Act 2002 (as amended), and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) to have arrangements in place to safeguard and promote the welfare of children.

This responsibility is more fully explained in the statutory guidance for schools and colleges 'Keeping Children Safe in Education' (**September 2023**). **All staff** must be made aware of their duties and responsibilities under part one of this document.

Staff should read the above document together with Annex B of Keeping Children Safe in Education (**September 2023**) and 'What to do if you are worried a child is being abused: Advice for practitioners' (March 2015) if they are working directly with children. For those staff who do not work directly with children or where English is a second language, Annex A can be issued instead but this is a matter for the academy's to decide.

Joyce Frankland Academy recognises the responsibility it has under the Equality Act 2010 to provide protection from direct/ indirect discrimination or harassment for people with a 'protected characteristic' that relate to:

- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion belief or non-belief
- Sex
- Sexual orientation
- Age

Through their day-to-day contact with pupils and direct work with families, **all staff in the academy have a responsibility to:**

- Identify concerns early to prevent them from escalating;
- Provide a safe environment in which children can learn;
- Identify children who may benefit from early help;
- Know what to do if a child tells them he/she is being abused or neglected;
- Follow the referral process if they have a concern;  
(See Keeping Children Safe in Education, **2023**)

Through their day-to-day contact with pupils and direct work with families, staff at the Academy have a crucial role to play in noticing indicators of possible abuse or neglect and referring them to Social Care via the Customer Service Centre (0345 603 7627). Designated Person for Child Protection to refer.

This policy sets out how the academy's Local Governing Body (LGB) and the Anglian Learning **trust board** discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at the academy. Our policy applies to all staff, paid and unpaid, including, supply staff, community education staff and governors. Teaching Assistants, office staff, and District Early Help Team

employees as well as teachers can be the first point of disclosure for a child. Concerned parents may also contact the academy and the academy's governors.

This policy is fully consistent with the Safeguarding Children Partnership Board procedures.

## **PRACTICE**

**There are four main elements to our policy:**

**PREVENTION** through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole academy protective ethos;

**PROCEDURES** for identifying and **referring** or suspected cases, of abuse **or exploitation**. The definitions of the four categories are included in Appendix B;

**SUPPORTING CHILDREN** particularly **those** who may have been abused or witnessed violence towards them;

## **PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN**

### **1. Prevention**

1.1. We recognise that high self-esteem, confidence, supportive friends, and good lines of communication with trusted adults help to protect children.

1.2. The academy will therefore:

Establish and maintain an ethos and environment where children feel safe in both the real and digital world and are encouraged to talk about their concerns and problems.

Ensure children know that there are **trusted** adults in the academy whom they can approach if they are worried or in difficulty; that their concerns will be taken seriously and acted upon.

Include in the curriculum activities and opportunities which equip children with the skills they need to stay safe from abuse in both the real and virtual world and information about who to turn to for help.

Tailor our curriculum to be age and stage appropriate so that it meets the specific needs and vulnerabilities of individual children, including those who have experienced abuse, and children with special educational needs or disabilities.

Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice, and equality.

Ensure that all academy's staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our 'Responding to Prejudice-Related Incidents Policy.'

Highlight through the curriculum potential online risks and what to do and where to get support to report material or manage online issues such as sexting or bullying.

Include in the curriculum material which will help children develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills.

Make full use of various agencies and independent speakers to support in providing a high quality PSHE curriculum, to review topics of safeguarding, healthy and safer lifestyles through the Academy's PSHE curriculum reflecting upon the Essex PSHE programme as examples of best practice.

Make full use of Early Help Teams through internal referral processes in order to support vulnerable children not subject to a Child Protection Plan.

1.2.1. Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:

- How to: determine whether other children, adults or sources of information are trustworthy: judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and, how to seek help or advice, including reporting concerns about others, if needed.
- The characteristics of positive and healthy friendships.
- That some types of behaviour within relationships are criminal, including violent behaviour and coercive control.
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.
- About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removed potentially compromising material placed online.
- What to do and where to get support to report material or manage issues online.
- The impact of viewing harmful content.
- That specifically explicit material e.g., pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including prison.
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM and how they can affect current and future relationships.

- How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online).

(Relationships Education, Relationships and Sex Education (RSE) & Health Education, DfE, 2021)

## 2. Procedures

- 2.1. We will follow the procedures set out in the Southend, Essex and Thurrock (SET) safeguarding and child protection procedures. A copy of these procedures can be found on their website:

<https://www.escb.co.uk/media/2739/set-procedures-may2022.pdf>

2.1.1. **The Designated Senior Member of Staff for Safeguarding and Child Protection is Lee Gamble (Ian Stoneham from September 2023 until further notice)**

2.1.2. The Deputy Designated Senior Members of Staff for Safeguarding and Child Protection are Dan Langley and Emma Brockwell

2.1.3. The following members of staff have also received the Designated Safeguarding training: Duncan Roberts, James Fitzgerald and Tamsin Page

- 2.2. The nominated Academy Governor for Safeguarding and Child Protection is Clare Denyer

The LGB and **Anglian Learning trust board** will **monitor and ensure**:

2.2.1. **The appointment of** a senior member of staff, from the leadership team to the role of Designated safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

2.2.2. That the role of DSL and DDSL is explicit in the role holders job description. **(As outlined in Keeping Children Safe in Education, 2023 Annex C. A copy of which is held in the Anglian Learning safeguarding framework).**

2.2.3. The training for both DSL and DDSL is updated every two years in accordance with government guidance.

2.2.4. That in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g., via bulletins, meetings, or **additional training at least annually.**

2.2.5. **That the DSL will take the lead responsibility for understanding and overseeing the filtering and monitoring systems and processes in place at the academy.**

- 2.2.6. The importance of the role of the Designated Safeguarding Lead and ensure they have the status, time, and training to undertake duties, which include providing advice and support to staff on child welfare and child protection matters. (See 'Keeping Children Safe in Education, 2023, Annex C). The DSL will have time to take part in inter-agency meetings and contributing to the assessment of children in need.
- 2.2.7. All staff receive annual training, including for new staff arriving mid-year as part of induction processes to ensure that they know the procedures for safeguarding.
- 2.2.8. That the DSL or DDSL are always available (during academy hours, during term-time) to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take. In exceptional circumstances it may be that no DSP are available therefore a member of the senior team will be contacted and/or advice will be sought from social care. During any out of hours regulated activity a member of the Academy Leadership Team will be identified as the emergency contact to use in this situation. [See Annex C, page 164 of Keeping Children Safe in Education 2023 for details of requirements.](#)
- 2.2.9. That the DSL and DDSL liaise with the three safeguarding partners (Local Authority, [Integrated Care Board](#), and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children 2018.
- 2.2.10. Teachers in training are briefed as part of their induction regarding procedures and receive a more in-depth training as part of their academy's programme.
- Supply teachers are provided with the academy's '[Quick reference guide](#)' that identifies the process for referral and who the DSP personnel are. This will allow prompt, appropriate action to be taken. In addition, information about safeguarding and the DSP personnel is part of the reception process for all visitors to the academy.
- 2.2.11. Every member of staff, paid or unpaid, and the Local Governing Body (LGB) knows what the contingency arrangements are for when the designated members of staff are not available; in the first instance this is the headteacher/principal. Should no designated personnel be available, another member of the Academy Leadership Team will act on behalf of the designated person.
- 2.2.12. Every member of staff, paid and unpaid, and the LGB, knows who the designated members of staff are and the procedures for passing on concerns **from the point of induction**. All paid staff will be trained in using the electronic system MyConcern and issued with their own personal login details. This system should be used to log any concerns. For all other staff and members of the LGB they will use the blue logging concern forms and will hand to the DSL/DDSL



or one of the DSP immediately. If any member of staff or visitor feels that a child is at immediate and significant risk, then the DSL/DDSL or DSP will be contacted as a matter of urgency.

2.2.13. That the designated member of staff will take advice from a child protection specialist when managing complex cases. The Designated Safeguarding Personnel have access to professional consultations with staff working in the Multi-agency Safeguarding Hub (MASH). The emergency duty team (out of hours) is also available, see Appendix C.

2.2.14. The nominated governor for safeguarding and child protection, Clare Denyer, has undertaken appropriate training.

2.2.15. That every member of staff and every governor knows:

- that all staff have a responsibility to provide a safe environment in which children can learn;
- the name of the designated safeguarding personnel and her/his role;
- how to identify signs of abuse or neglect, **understanding that children can be at risk of harm inside and outside of the academy, inside and outside of home, and online;**
- how to pass on and record concerns about a pupil;
- that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful;
- that they have an individual responsibility to be alert to the signs and indicators of abuse **and exploitation** and for referring safeguarding concerns to the designated safeguarding personnel using the academy's procedures for referral;
- what is meant by, and the importance of, showing professional curiosity;
- where to find the SET procedures (details in section 2.1);
- their role in the early help process;
- the process for making referrals to children's social care;
- the safeguarding response to children who **are absent from education, particularly on repeat occasions and/ or prolonged periods;**
- **the role of filtering and monitoring and the process for reporting issues.**

2.2.16. **Ensure staff receive appropriate safeguarding and child protection training (including online safety) to continue to provide them with relevant skills and knowledge to safeguard children effectively. This should be regularly updated, at least annually so that they know:**

- the academy's legislative responsibility;
- their personal responsibility;
- the academy's policies and procedures;



- the need to be alert and vigilant to the signs and indicators of possible abuse;
- the need to record concerns;
- how to support and how to respond to a child who tells of abuse **and/or exploitation;**
- **the academy's response to children who are absent from education;**
- **the expectations, applicable roles, and responsibilities in relation to filtering and monitoring as part of the overarching safeguarding approach of the academy.**

2.2.17. That all staff and every governor recognises the need to ensure that those with '**protected characteristics**' are treated fairly and that they are protected from all forms of discrimination and harassment.

2.2.18. That all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies. The Anglian Learning whistle-blowing policy refers to passing on concerns about unsafe practice to the Designated Person in 2.1.1 and 6.4.4. This policy describes how any academy's employee can raise any concerns s/he may have about working practices and who should be informed about the concerns. It may be that issues raised via this policy will be addressed via other procedures, e.g., anti-fraud and corruption, grievance, disciplinary, harassment and **child protection procedures**. **All staff should be aware of, and have read, the low-level concerns policy.**

2.2.19. That parents are informed of the responsibility placed on the academy's and staff in relation to child protection by setting out these duties on the academy's website and in the prospectus.

2.2.20. Provide for parents, if requested, a copy of the academy's or Trust Safeguarding and Child Protection Policy, or refer them to the policy that is available on the academy's website at [www.joycefrankland.org](http://www.joycefrankland.org)

2.2.21. The Anglian Learning Trust Board and the Joyce Frankland Academy Local Governing Body (LGB) will ensure that all staff members undergo safeguarding and child protection training at induction. The training should be regularly updated. In addition, all staff members will receive regular safeguarding and child protection updates as required **but at least annually**.

2.2.22. **The Anglian Learning trust board and the Joyce Frankland Academy LGB will ensure that there are appropriate filtering and monitoring systems in place and that they recognise which children are potentially at greater risk of harm and how often they access the IT system.**

2.2.23. Promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including children who have or have had a social worker) are experiencing/have experienced with teachers and academy and leadership staff.

2.2.24. Where pupils are educated off site or in alternative provision, the academy and the provider will have clear procedures about managing safeguarding concerns between the two agencies. The academy will require an up-to-date copy of the provisions Safeguarding Policy and written confirmation that all appropriate safeguarding checks on individuals working at the provision have been undertaken and no anomalies found. The academy will also conduct regular visits to providers as part of a quality assurance process and this will include ensuring processes are being followed as stated in providers policy. The academy will insist on providers giving a daily attendance update and that any absences are reported immediately.

### 2.3. Liaison with Other Agencies

The academy will:

2.3.1. Work to develop effective links with relevant services and agencies to promote the safety and welfare of all pupils.

2.3.2. Co-operate as required, in line with Working Together to Safeguard Children (July 2018), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.

2.3.3. Notify the relevant Social Care team immediately if:

- it should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently);
- there is an unexplained absence of a pupil who is subject to a Child Protection Plan;
- there is any change in circumstance to a pupil who is subject to a Child Protection Plan.

2.3.4. When a pupil who is subject to a child protection plan leaves, information will be transferred to the new academy immediately. The Child Protection Chair and Social Care Work Team will also be informed.

### 2.4. Record Keeping

The academy will:

2.4.1. Ensure all concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. Ensure that all

electronic records are stored on My Concern (the academy's choice of an identified, purpose built, and secure platform).

Ensure that logs on My Concern are clear, detailed, and accurate (Keep clear, detailed, accurate, written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to **Children's** Social Care immediately). Ensure that all paper records received are kept securely; separate from the main pupil file and in a locked location. Paper files should be signed for on removal from and return to storage.

#### 2.4.2. Records should include:

- A clear and comprehensive summary of the concern;
- The child's wishes and feelings;
- Details of how the concern was followed up and resolved;
- A note of any action taken, decisions reached and the outcome;
- A record of any discussion/ communication with parents or other agencies.

2.4.3. Ensure all relevant child protection records are sent to the receiving academy or establishment when a pupil moves academy, within five days, in accordance with 'Keeping Children Safe in Education', **2023, (page 167) and the Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records**. The DSL will consider whether it would be appropriate to share information with the new school or college in advance of the child leaving.

2.4.4. Make parents aware that such records exist except when to do so would place the child at risk of harm.

2.4.5. All actions and decisions will be led by what is considered to be in the best interests of the child following discussions between professionals working with the individual child.

#### 2.5. Confidentiality and Information Sharing

The Data Protection Act 2018 does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child. Information about children and their families is defined as 'special category data,' i.e., information that identifies a living individual. Collection, storage and sharing of personal data is governed by the UK General Data Protection Regulations (UK GDPR)

The academy will:

2.5.1. Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately; ensure they are also aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in 'Information sharing; Advice for practitioners providing safeguarding

services to children, young people, parents and carers,' DfE, July 2018).

2.5.2. Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL or Principal.

2.5.3. Ensure staff are clear with children that they cannot promise to keep secrets.

The Designated Safeguarding Lead / Deputy will:

2.5.4. Disclose information about a pupil to other members of staff on a 'need to know' basis **considering what is necessary, proportionate, and relevant**. Parental consent may be required.

2.5.5. Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a person believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child and **where to not do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime**.

2.5.6 Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' July 2018)

In cases where the 'serious harm test' is met, academies must withhold providing the data in compliance with the obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt, academies should seek independent legal advice.

2.5.7. Seek advice about confidentiality from outside agencies if required. (See 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).

2.5.8. Ensure that all pupils' files are requested on admission to the academy be that from primary school or where a pupil joins the academy from another school throughout the year. Primary records will be collected where possible by either DSL or DDSL.

2.5.9. Ensure that all Post-16 records are forwarded on request via recorded delivery and that acknowledgement of receipt of records is logged via written confirmation.

## 2.6. Communication with Parents

The academy will:

- Ensure that parents/carers have an understanding of the responsibility placed on the academy and staff for ensuring child protection is

adhered to by publishing its Child Protection policy on the academy's website.

- Discuss with Children's Social Care if the academy believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime. *Further guidance on this can be found in the Effective Support for Children and Families in Essex: <https://www.escb.co.uk/media/2701/escb-effectivesupportbooklet2021v7.pdf>].*
- Particular circumstances where parents **may not** be informed include any disclosure of sexual abuse or physical abuse where the child has an injury, where it would place the child at immediate risk of harm, or where it may lead to the loss of evidence or prejudice the prevention or detection of crime. Rationales for these decisions must be recorded.
- All discussions that have taken place with parents regarding the child's welfare to be recorded on My Concern or if the decision has been made not to discuss it with parents, record the reasons why.
- Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.
- Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, record the reasons why. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

## 2.7 Prevention of Child-on-Child Abuse

We recognise that child on child abuse can manifest itself in many ways. This can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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; upskirting part of the Voyeurism (Offences) Act, April 2019) and initiation/ hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

**All** forms of child-on-child abuse are unacceptable and will be taken seriously.

The academy will:

- 2.7.1. Create a whole academy protective ethos in which child on child abuse, including sexual violence and sexual harassment will not be tolerated. Refer to the Sexual Harassment and Sexual Violence addendum 2021. Appendix E
- 2.7.2. Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature

of peer abuse, with girls more likely to be victims and boys' perpetrators.

- 2.7.3. Ensure that staff members follow the procedures in this policy and those in the Sexual Harassment and Sexual Violence addendum 2021 Appendix E when aware of child-on-child abuse, referring any concerns of child-on-child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding reporting procedures. The DSL will respond to concerns related to child-on-child abuse in line with guidance outlined in *Part 5 of 'Keeping Children Safe in Education'*
- 2.7.4. Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence, sexual harassment, sexual taunting or 'banter' and the use of derogatory and misogynistic language as an inevitable part of growing up **or banter**.
- 2.7.5. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. Academies will ensure that these children have a trusted adult in the academy to talk to.
- 2.7.6. Recognise the risk of intra familial harms and provide support to siblings following incidents where necessary.
- 2.7.7. Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- 2.7.8. Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes to allow children to take ownership of their own safety in ensuring that they are given information that empowers them to make informed and positive choices by:
  - Recognising whether other children, adults or sources of information are trustworthy, how to judge when a friendship is making them feel unhappy or uncomfortable and how to seek help or advice from others, if needed;
  - Understanding characteristics of what makes positive and healthy friendships and other relationships;
  - Acknowledging that some types of behaviour within relationships are criminal, including violent behaviour and coercive control;
  - Understanding what constitutes sexual harassment and sexual violence and why these are always unacceptable;
  - About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removed potentially compromising material placed online;
  - What to do and where to get support to report material or manage issues online;

- Acknowledging the impact of viewing harmful content and specifically explicit material e.g., pornography and how this presents a distorted picture of sexual behaviour and relationships;
- Having an understanding of the law concerning the sharing and viewing of indecent images of children (including those created by children) and that it is a criminal offence which carries severe penalties including jail;
- Being able to understand what sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM are and how they can affect current and future relationships;
- Understanding that consent can be actively communicated and how to recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online);

2.7.9. In the case of an allegation, staff are to refer to the Sexual Harassment and Sexual Violence addendum to the safeguarding policy 2021 for details on prevention and procedure. Appendix E.

The Designated Safeguarding Lead will refer to the Southend, Essex and Thurrock sexual violence and abuse strategy if there is a concern that a young person may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse.

## 2.8. Dealing with Sexual Violence and Sexual Harassment between children

- Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into college/post-16. It can also occur wholly online, concurrently online, and offline, or technology may be used to facilitate offline abuse. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same academy. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.
- Sexual violence may include rape, assault by penetration or sexual assault. Sexual harassment refers to 'unwanted conduct of a sexual nature,' such as sexual comments, sexual taunting, or physical behaviour such as deliberately brushing against someone.
- Online sexual harassment may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted



sexual comments and messages, and sexual exploitation, coercion, and threats.

The academy will:

- 2.8.1. Be clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- 2.8.2. Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- 2.8.3. Make decisions on a case-by-case basis.
- 2.8.4. Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 2.8.5. Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- 2.8.6. Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- 2.8.7. Liaise closely with external agencies, including police and social care, when required.
- 2.8.8. Academies are to follow the procedures outlined in:
  - Sexual Harassment and Sexual Violence addendum to the safeguarding policy 2021 Appendix E.
  - 'Keeping Children Safe in Education – Part Five' 2023, Sexual violence and sexual harassment between children in schools and colleges,' (DfE, September 2021).
  - Academies should also refer to Sharing nudes and semi – nudes: advice for education settings working with children and young people' (UKCIS, December 2020) Appendix F.

### 3. Supporting Children

The academy recognises that **any** child may be subjected to abuse and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and as such will support all children.

- 3.1. We recognise that the impact on children who are abused, or witness violence may last into adulthood without appropriate intervention and support.
- 3.2. The academy may be the only stable, secure, and predictable element in the lives of children at risk. Nevertheless, when at school/college their behaviour may be challenging and defiant or they may be withdrawn.

- 3.3. We recognise that some children actually adopt abusive behaviours and that these children must be referred on for appropriate support and intervention.
- 3.4. The academy will support all pupils through:
  - 3.4.1. Cross-curricular opportunities to encourage self-esteem and self-motivation.
  - 3.4.2. The academy's ethos that actively promotes a positive, supportive, and secure environment and gives pupils a sense of being valued.
  - 3.4.3. Applying the academy's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the offence committed by the child but does not damage the pupil's sense of self-worth. The academy will ensure that the pupil knows that some behaviour is unacceptable, but she/he is valued and not to be blamed for any abuse which has occurred.
  - 3.4.4. Liaise with the senior mental health lead in the academy where safeguarding concerns are linked for advice on case management.
  - 3.4.5. Liaison with other agencies which support the pupil such as Social Care, Child and Adolescent Mental Health Services, Essex specialist sexual health services, the Educational Psychology Service or Early Help (**targeted support**) Teams.
  - 3.4.6. A commitment to promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
  - 3.4.7. The academy recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances. Please see page 9 of Keeping Children Safe in Education, 2023 for the complete list. The list includes:

**Children with Disabilities, **Certain Health Conditions**, Additional Needs or Special Educational Needs**

The academy recognises that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties, and disabilities are most vulnerable to abuse. Academy staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

The academy has pupils with emotional and behavioural difficulties and/or challenging behaviours, communication difficulties and mental health needs.

**Under the Equality Act, there is a duty to make reasonable adjustments for disabled children and young people.**

The academy will:

- 3.5. Support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall support plan agreed with parents/carers.
- 3.6. Promote through a differentiated curriculum and adult support how pupils with additional needs can recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how to recognise and manage risk including in a digital context. The content of lessons will be shared with parents/carers so that they can be supported at home.
- 3.7. Will be aware of pupils who may have communication difficulties and are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

Where necessary, the academy will provide additional training to staff in the use of Makaton, PECS, or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the child.

- 3.8. Promote high standards of practice, including ensuring that children with additional needs know how to raise concerns, and have access to a range of adults with whom they can communicate.
- 3.9. Young Carers

The academy recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

The academy will:

- Seek to identify young carers;
- Offer additional support internally; **insert name, the** Young Carers Champion;
- Signpost to external agencies; C33 Young Carers support the pupils in the academy;
- Be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

### 3.10. Children Frequently **Absent from Education**

The academy recognises that children who are **absent from education, or who go missing from education**, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, mental health problems,

risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

Children with persistent or erratic attendance are more vulnerable and therefore the academy will:

- The attendance lead will regularly liaise with the Designated Safeguarding Lead to discuss all persistently absent pupils and those who go missing to identify the risk of abuse and neglect, including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm;
- Closely monitor attendance of individual pupils who are absent from education and analyse patterns of absence to aid early identification of concerning patterns of absence;
- Endeavour to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child who is absent from education is identified as a welfare and/or safeguarding concern;
- When a child is absent from education, the academy follows the procedure as set out in Essex's Children Missing Education guidance. The academy will inform the Local Authority Attendance officer and Social Care if a child who is absent from education is subject to a Child Protection Plan or there have been ongoing concerns.

### 3.11. Substance Misuse and Child Protection

The discovery that a young person is using legal or illegal substances or reported evidence of their substance use is not necessarily sufficient in itself to initiate child protection proceedings but the academy will consider such action in the following situations:

When there is evidence or reasonable cause:

- To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- To believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
- Where the misuse is suspected of being linked to parent/carer substance misuse;
- Where the misuse indicates an urgent health or safeguarding concern;
- Where the child is perceived to be at risk of harm through any substance associated criminality;
- Where a young person has been caught bringing substances into the academy they will be dealt with as per the academy's Behaviour Policy.

### 3.12. Children Living with Substance Misusing Parents / Carers

3.12.1. Misuse of substances in parents/carers is strongly associated with significant harm to children, especially when combined with other features such as domestic violence.

3.12.2. When the academy receives information about substance abuse by a child's parents/carers they will follow appropriate procedures.

3.12.3. This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children;
- Children exposed to unsuitable caregivers or visitors e.g., customers or dealers;
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour;
- The parental misuse is regarded as problematic including unsafe storage of drugs and injecting equipment;
- A chaotic and unpredictable home environment exists which can be attributed to drug or alcohol misuse leading to emotional unavailability, irrational behaviour and reduced parental vigilance;
- Children are not being provided with acceptable or consistent levels of social and health care;
- Disturbed moods as a result of withdrawal or dependency;
- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child.

### 3.13. Children showing signs of Abuse and / or Neglect

The academy recognises that experiencing abuse or neglect may have an adverse impact on those children which may last into adulthood without appropriate intervention and support.

The academy will:

- Provide a stable, secure, and predictable element in the lives of young people at risk. Children who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn;
- Support young people who may develop abusive behaviours and refer them on for appropriate support and intervention;
- Provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy. The definitions of the four categories of abuse are attached (see Appendix B).
- All staff, but especially the DSL/DDSL 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;
- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can occur between children outside of these environments.

### 3.14. Privately Fostered Children

Private fostering is 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 relative in their own home for 28 days or more.

The academy will:

- Follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team.

### 3.15. Children who have returned home to their family from care

The academy recognises that a previously looked after child potentially remains vulnerable and staff will vigilantly monitor the welfare of previously looked after children, keep records, and notify Social Care as soon as there is a recurrence of a concern in accordance with the Southend, Essex and Thurrock (SET) safeguarding and child protection procedures. The academy's Designated Teacher for Previously and Currently Looked after children **Emma Brockwell**

### 3.16. Children who have Family Members in Prison

The academy is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.

It recognises that children with family members in prison are at risk of poor outcomes including:

- Poverty;
- Stigma;
- Isolation;
- Poor mental health;
- Poor attendance.

The academy will work with the family, **specialist organisations and the child**, to support minimise the risk of the child not achieving their full potential. They will treat information shared by them in confidence **and on a need-to-know basis**.

### 3.17. Children living with Domestic Abuse

The academy's Designated Lead on Domestic Abuse is Dan Langley

3.17.1. Domestic Abuse Act 2021 **applies to those aged 16** or over and introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse.

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. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse.' Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are 'personally connected' regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial, and emotional, coercive, or controlling behaviour.

3.17.2. Where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

3.17.3. Schools are ideally placed to offer appropriate support, alongside other agencies, whether families are in crisis, or whether there are early signs of potential abuse. The academy will vigilantly monitor the welfare and attendance of children living in domestic abuse households. Contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plans as required.

3.17.4. Joyce Frankland Academy will work in partnership with Essex Police and Essex County Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home. This partnership is called Operation Encompass.

3.17.5. Essex's Education Safeguarding team will share information of all domestic incidents where police have been called with the Designated Safeguarding Lead (DSL)/Domestic Abuse Lead (DAL)



where one of the academy's pupils has been present (having either witnessed or heard the incident).

3.17.6. On receipt of any information, the DSL/DAL will take appropriate action to ensure the safety of the child and if necessary, share the information with key staff such as Year Leads.

3.17.7. All notifications and information are stored confidentially in line with the academy's safeguarding record keeping as outlined in 2.4.

3.17.8. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All information sharing and resulting actions will be undertaken in accordance with the Southend, Essex and Thurrock Domestic abuse board.

### 3.18. Children at risk of 'Honour-Based' abuse including Female Genital Mutilation (FGM)

3.18.1. So called 'Honour-Based' abuse (HBA) encompasses incidents which are committed to protect or defend the honour of the family and/or the community including breast ironing, female genital mutilation (FGM) and forced marriage.

3.18.2. "FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways." (Multi-agency statutory guidance on female genital mutilation, April 2016).

3.18.3. In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police.

3.18.4. The academy takes these concerns seriously and staff will be made aware of the possible signs and indicators that may alert them to the possibility of FGM. Any indication that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures outlined in this policy.

3.18.5. The Designated Safeguarding Lead will make appropriate and timely referrals to Social Care if FGM is suspected. In these cases, parents will not be informed before seeking advice. The case will still be referred to Social Care even if it is against the pupil's wishes.

### 3.19. Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. The new Marriage and Civil Partnership (Minimum Age) Act 2023 bans marriage for 16 and 17-year-olds, who no

longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18, even if violence, threats, or another form of coercion are not used. The Forced Marriage Unit has [statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or more information.

### 3.20. Children at risk of Child Sexual Exploitation (CSE)

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

CSE 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.

3.20.1. Sexual exploitation can take many forms from a seemingly 'consensual' relationship to serious organised crime involving gangs and groups.

3.20.2. Exploitation is marked out by an imbalance of power in the relationship and involves varying degrees of coercion, intimidation and sexual bullying including cyber-bullying and grooming.

3.20.3. Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people being sexually exploited do not show any external signs of this abuse and may not recognise that they are being abused.

3.20.4. Young people who go missing can be at increased risk of sexual exploitation and so procedures are in place to ensure the appropriate response to children and young people who go missing, particularly on repeat occasions. At the academy this involves working with the family, referring to social care, involving police action and referring to the locality.

3.20.5. The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Exploitation (CSE/Criminal/Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of CSE.

3.20.6. At Joyce Frankland Academy we are working in partnership with Essex Police and Essex County Council to identify and provide appropriate support to pupils who have gone missing through the Operation Encompass scheme. Essex's Education Safeguarding Team will share police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any

information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

### 3.21. Children at risk of Child Criminal Exploitation (CCE)

As with CSE, 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. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

3.21.1. As with CSE children are coerced to participate in illegal activities 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 academy's Prevent Lead is Dan Langley in addition, the governing body will ensure that the DSL has undertaken Prevent awareness training and that all staff receive training about the Prevent duty.

3.21.2. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines see 3.22). forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late, and children who regularly miss academy or education or do not take part in education;
- The academy recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

3.21.3 The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Exploitation (CSE/Criminal Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of CSE.

### 3.22. Children at Risk of Radicalisation

Children are **susceptible** to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of an academy's safeguarding approach.

The governing body will ensure that the DSL has undertaken Prevent awareness training and that all staff receive training about the Prevent Duty.

Staff are required to be alert to changes in children's behaviour which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The academy's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

- All new staff are required to undertake online accredited Prevent training as part of the academy's safeguarding induction;
- See also "The Prevent Duty, Departmental advice for schools and childcare providers," June 2015, Department for Education and "Revised Prevent Duty Guidance: for England and Wales", July 2015, HM Government.

### 3.23. County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line"

3.23.1. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money.

3.23.2. Children can be targeted and recruited into county lines in a number of locations including academies.

3.23.3. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

3.23.4. The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Exploitation (CSE/Criminal/Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be involved in County Lines.

### 3.24. Modern slavery

Encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature. for concerns of this nature.

## 4. Preventing Unsuitable People from Working with Children

- 4.1. The academy will operate safe recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part Three of 'Keeping Children Safe in Education 2023 and the Joyce Frankland Academy Central Record of Recruitment and Vetting Checks policy.
- 4.2. The Headteacher/Principal will undertake 'random' checks of the Single Central Record (SCR) to ensure all requirements have been seen and logged and that any discrepancies can be explained.
- 4.3. The LGB will ensure that at least one of the persons who conducts interviews has completed safer recruitment training. The following members of staff have completed the Safer Recruitment training: Duncan Roberts, Lee Gamble, James Fitzgerald, Tamsin Page, Ian Stoneham and Dan Langley.

**Allegations that may meet the harms threshold (Part Four, Section One)**

- 4.3.1. Any allegation of abuse made against a member of staff or supply staff contractors and volunteers will be reported straight away to the headteacher or principal. Where an allegation is against a member of the Central Trust team, this will be reported to the CEO. In cases where the headteacher or principal is the subject of an allegation, it will be reported to the Trust CEO and the **Chair of the Trust**, in line with the Allegations flowchart Appendix D. The academy will follow the procedures set out in Part four, Section One of 'Keeping Children Safe in Education' (2023).
- 4.3.2. The academy will consult with the Central Trust HR team and the Local Authority Designated Officer (LADO) in the event of an allegation being made against a member of staff, volunteer or agency/supply staff and adhere to the relevant procedures set out in 'Keeping Children Safe in Education,' 2023. In cases where the Headteacher or Principal is the subject of an allegation, it will be reported to the Trust CEO/ Director of People and then to the Chair of Trustees. The academy will follow the procedures set out in Part Four of 'Keeping Children Safe in Education,' 2023.
- 4.3.3. The Central Trust team, headteacher or Chair of Trustees in discussion, will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.
- 4.3.4. Before contacting the CEO and the LADO, academies should conduct basic safeguarding 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. Academies will use the guidance chart found at Appendix D to support their decision-making.
- 4.3.5. Where the academy identifies a child has been harmed and that there may be an immediate risk of harm to a child or if the situation is an

emergency, they should contact children's social care and as appropriate the police immediately.

4.3.6. Academies will consider:

- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content, and context of the allegation, and agree a course of action.

4.3.7. The academy will ensure that any disciplinary proceedings against staff, volunteers **or contractors** relating to child protection matters are concluded in full even when the member of staff or volunteer is no longer employed at the academy and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

4.3.8. Staff, volunteers **or contractors** who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

4.3.9. Consideration must be given to the needs of the child and recognition that a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

#### **Concerns that do not meet the harms threshold (Part Four, Section Two)**

4.4.1. Low level concerns that do not meet the harms threshold should be reported to the headteacher or principal. NB The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.

4.4.2. In cases where the headteacher or principal is the subject of an allegation, it will be reported to the Director of People, CEO and the Chair of Trustees. The academy will follow the procedures set out in Part Four of 'Keeping Children Safe in Education' 2023.

4.4.3. The academy will deal with any such concern, no matter how small, where an adult working in or on behalf of the academy may have acted in a way that:



- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
  - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 4.4.4. All low-level concerns should be recorded in writing, and all staff should be aware of the processes for reporting a concern. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- 4.4.5. Academies can decide where these records are kept, but they must be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

**(Academies: *Please state here how your records are kept e.g., hardcopy or online and with whom they are stored.*)**

- 4.5. The academy will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the academy or academies in the Trust (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. This will enable the academy and Trust to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the academy/Trust are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.
- 4.5.1. The academy will ensure that all staff, including **supply staff, volunteers and contractors** are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022). As part of their induction process, all staff **including supply staff, volunteers and contractors** will receive guidance about how to create appropriate professional boundaries with children (both on and offline) especially those with a disability or deemed vulnerable. Staff are encouraged 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.
- 4.5.2. All staff will have read and signed a copy of the Anglian Learning Staff Code of Conduct and Guidance for Safer Working Practice for Adults who work with Children and Young People in Educational Settings' (February 2022).



- 4.5.3. The academy will ensure that staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings being taken against them under the Sexual Offences Act 2003 (Abuse of position of trust).
- 4.5.4. Staff who work within an academy have a duty of care to model appropriate social behaviours and to ensure that the professional role of trust is not abused.
- 4.5.5. The academy will ensure that communication between pupils and adults, by whatever method, is transparent and takes place within clear professional boundaries and is open to scrutiny.

## 5. Other Related Policies

- Anti-bullying policy
- Attendance policy (including children missing education)
- Behaviour policy
- Complaints policy
- Critical Incident plan
- Equality policy
- First Aid policy
- Health and Safety policy
- Lone Working policy
- Online Safety and Acceptable Use policy
- Safer Recruitment policy
- Staff Code of Conduct/Safer Working Practice
- Staff Discipline and Grievance procedures
- SEND
- Whistleblowing policy

## 6. LGB Safeguarding Responsibilities

LGBs should ensure they facilitate a whole academy approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

- 6.1. The Anglian Learning trust board and LGBs fully recognise their responsibilities with regard to child protection and to safeguarding and promoting the welfare of children. They aim to ensure that the policies, procedures, and training in academies are effective and comply with the law and statutory guidance at all times:

They will

- Designate a governor for safeguarding and child protection who will oversee the **implementation** of the academy's child protection policy and practice and champion child protection issues, undertaking monitoring as required in the LGB Handbook and the **Anglian Learning safeguarding framework**;

- Ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in academies are effective and support the delivery of a robust whole academy approach to safeguarding. This training will be regularly updated;
- Ensure governors and trustees are aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010, the Public Sector Equality Duty, and the local multi-agency safeguarding arrangements;
- Monitor the academy's compliance with statutory requirements and **ensure that any weaknesses identified through Anglian Learning audits or peer reviews are rectified without delay;**
- Ensure an annual report is made to the Governing Body and Anglian Learning trust, and copied to the Education Child Protection Service;
- Ensure that this policy is annually reviewed, updated, and copied to the Education Child Protection Service. That the policy is shared with staff and published on the academy's website;
- Ensure that children's exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems;
- Ensure children's wishes and feelings are taken into account where there are safeguarding concerns;
- Ensure that they have due regard to their public sector equality duty to cover the 'protective characteristics.' Equality Act 2010

## 6.2 Use of academy premises for non-academy activities

- 6.2.1. If the LGB and Anglian Learning trust provides extended school facilities or before or after school activities directly under the supervision or management of academy's staff, the academy's arrangements for safeguarding as written in this policy shall apply. **Reference will be made to the DfE guidance [Keeping children safe in out-of-school settings](#).**
- 6.2.2. **If an allegation is made relating to an incident that happened when an individual or organisation was using academy premises for non-school activities, we will follow the safeguarding policies and procedure as written in this policy.**
- 6.2.3. Where services or activities are provided separately by another body the LGB/Anglian Learning trust will seek assurance that the body concerned has appropriate policies and procedures in place for safeguarding children and child protection and there are adequate arrangements to liaise with the academy on these matters where appropriate.

***Policy adopted by the Local Governing Body on***

***Review: Summer 2024***

Signed by the Principal

.....

CEO Anglian Learning

.....

Chair of Governors

.....

Designated Safeguarding Lead

.....

## Appendix A: Training

The academy **provides** additional training for its Designated Child Protection officers, Pastoral support staff and academy governors. This includes the **compulsory annual refresher course for all adults employed at the academy**.

**Adults not employed by the academy** but who have access to the children, including all academy Governors, peripatetic music teachers, **or regular contractors are** required to attend training provided by the academy. Supply teachers are provided with a Quick Reference guide that informs about academy's procedures for reporting concerns, including the named persons who are designated to manage disclosures and referrals.

New staff receive training from a designated person personnel as soon as is reasonably possible; this is part of new staff induction so that staff know:

- i) Their personal responsibility;
- ii) The child protection procedures;
- iii) The need to be vigilant in identifying cases of abuse;
- iv) How to support and to respond to a child who tells of abuse.

The training of staff ensures that the procedures set out in this policy and in the child protection guidance to staff are fully understood.

The following are part of staff training:

- Staff should never arrange meetings with individual pupils off the academy premises without the prior approval of the headteacher/principal;
- Staff should not transport individual children in private cars unless approved by the headteacher/principal or Designated Safeguarding Lead (or Deputy). In these cases, a second adult must accompany the member of staff and where possible the parent informed;
- Staff should not arrange private tuition of any of the academy's pupils, in the academy or beyond, during term time or holiday time, without the prior approval of the headteacher/principal. Intervention and tuition that is planned as part of academy based catch up programme should take place in an 'open classroom;'
- Staff should never give pupils their personal email address, mobile phone number or have any contact with pupils on social networking sites. If a young person makes a 'friend' request or comments on a staff member's private site this must be reported to the Designated Safeguarding Lead or Principal as soon as possible;
- Staff should never use mobile phones in the classroom or when in direct contact with the children either to make or take calls or to take photographs of the children. A mobile phone may be necessary on a trip, but in this case, the academy's mobile should be used;
- Staff should never photograph pupils using their own cameras unless using a memory card provided by the academy. All photographs taken of the children should be uploaded on academy's computers only.

## **Appendix B: Four Categories of Abuse**

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

### **1. Physical Abuse**

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

### **2. Neglect**

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.

It may occur during pregnancy as a result of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

It also includes parents or carers failing to:

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

### **3. Emotional Abuse**

Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to the child that they are:

- Worthless;
- Unloved;
- Inadequate;
- Valued only in so far as they meet the other persons needs

It may include:

- Not giving the child opportunities to express their views;
- Deliberately silencing them;
- 'Making fun' of what they say and how they communicate;

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- Interactions that are beyond the child's developmental capability;
- Overprotection and limitation of exploration and learning;
- Preventing participation in normal social interaction.

It may involve:

- Seeing or hearing the ill-treatment of another;
- Serious bullying (including cyber bullying) causing children frequently to feel frightened or in danger;
- The exploitation or corruption of children;

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone.

#### **4. Sexual Abuse**

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

This may involve:

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

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

**Child Criminal Exploitation** - Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

#### **Standards for Effective Safeguarding Practice in Academies**

Child protection matters are receiving an increased priority in Ofsted inspections. The following standards may assist academies in evaluating their practice

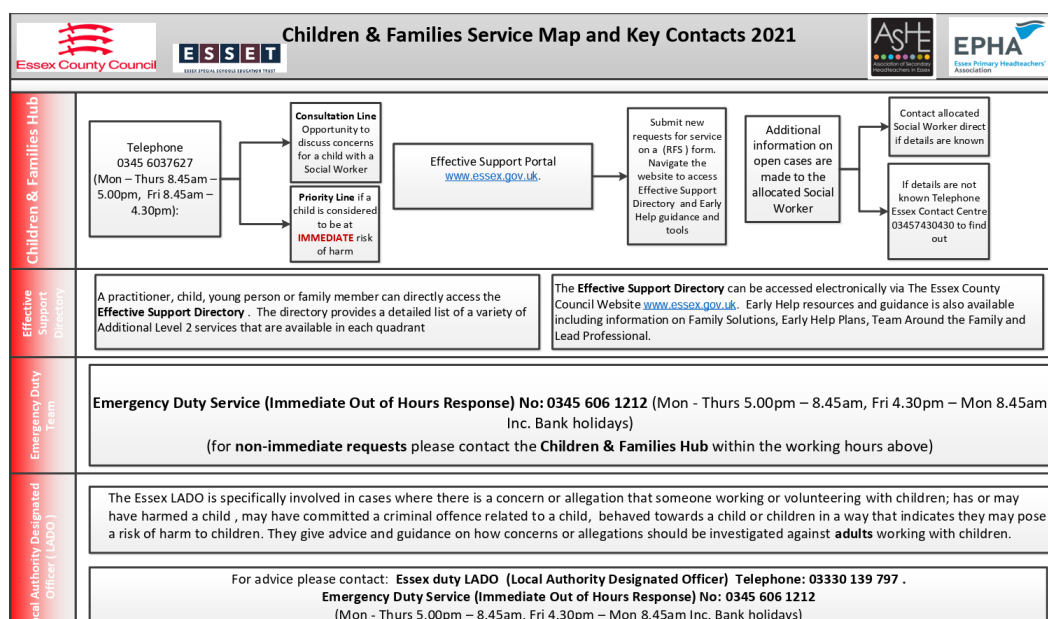
In best practice, academies:

1. Have an ethos in which children feel secure, their viewpoints are valued, and they are encouraged to talk and are listened to;
2. Provide suitable support and guidance so that pupils have a range of appropriate adults to whom they can turn if they are worried or in difficulties;
3. Work with parents/carers to build an understanding of the academy's responsibility to ensure the welfare of all children and a recognition that this may occasionally require children to be referred to other agencies as a constructive and helpful measure;
4. Are vigilant in cases of suspected child abuse, recognising the signs and indicators, have clear procedures whereby all staff report such cases to the designated person and are aware of local procedures so that information is passed on to the relevant professionals;
5. Monitor children who have been identified as at risk, keeping, *in a secure place*, clear records of pupils' progress, maintaining sound policies on confidentiality, providing information to other professionals, submitting reports to case conferences, and attending case conferences;
6. Provide and support child protection training regularly to the academy's staff every three years and to designated teachers every two years to ensure their skills and expertise are up to date, and ensure that targeted funding for this work is used solely for this purpose;
7. Contribute to an inter-agency approach to child protection by developing effective and supportive liaison with other agencies;
8. Use the curriculum to raise pupils' awareness and build confidence so that pupils have a range of contacts and strategies to ensure their own safety and understand the importance of helping others to stay safe;
9. Provide clear policy statements for parents/carers, staff and children and young people on this and on both positive behaviour policies and the academy's approach to bullying;
10. Have a clear understanding of the various types of bullying - physical, verbal, indirect, and cyber-bullying, - act promptly and firmly to combat it, making sure that pupils are aware of the academy's position on this issue and who they can contact for support;
11. Take particular care that pupils with SEND in mainstream and special schools, who may be especially vulnerable to abuse, are supported effectively. Particular attention should be paid to ensuring that those with communication difficulties are enabled to express themselves to a member of staff with appropriate communicative skills, e.g., Makaton or PECS;
12. Have clear guidance about the handling of allegations of abuse by members of staff, ensuring that all staff are fully aware of the procedures and that they are followed correctly at all times, using the guidance set out in the DfES (now DfE) document Safeguarding Children and Safer Recruitment in Education;



13. Have a whole academy Safeguarding and Child Protection policy, which is regularly reviewed and made available to all academy staff;
14. Ensure that specified information requested in the Annual Child Protection Monitoring Report to Governors is passed on to the LA for monitoring purposes.

## Appendix C: Useful Contacts



### Relevant Documents

“Keeping Children Safe in Education: Statutory guidance for school and colleges” (September 2023)

“Keeping children safe during community activities, after academy clubs and tuition: non – statutory guidance for providers running out of school settings” April 2022

“Guidance for Safer Working Practice for those working with children and young people in education settings” (February 2022)

“Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (July 2018)

“Meeting digital and technology standards in schools and colleges, filtering and monitoring standards for schools and colleges” March 2023

“The Prevent Duty, Departmental advice for schools and childcare providers” (June 2015)

“The Prevent Duty: safeguarding learners vulnerable to radicalisation (October 2022)

“Sharing nudes and semi-nudes: advice for education settings working with children and young people” (UKCIS, December 2020)

“Sexting in schools and colleges: Responding to incidents and safeguarding young people” published by the UK Council for Child Internet Safety (UKCCIS) – (December 2020)

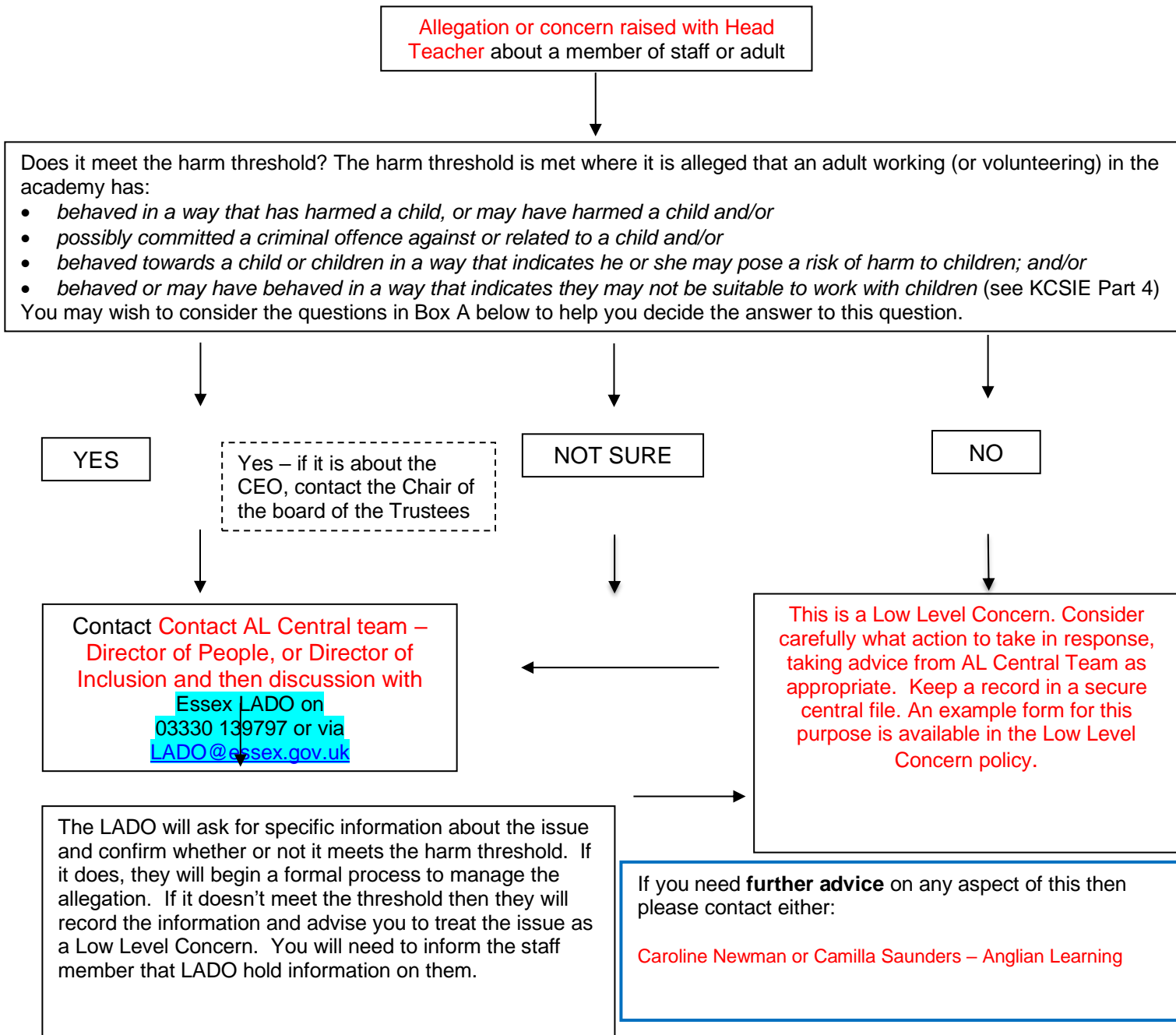
“Sexual violence and sexual harassment between children in schools and colleges” (September 2021)

“What to do if you’re worried a child is being abused: Advice for practitioners” (March 2015)

“When to Call the Police: guidance for schools and colleges,” (National Police Chief Council)

“Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (July 2018)

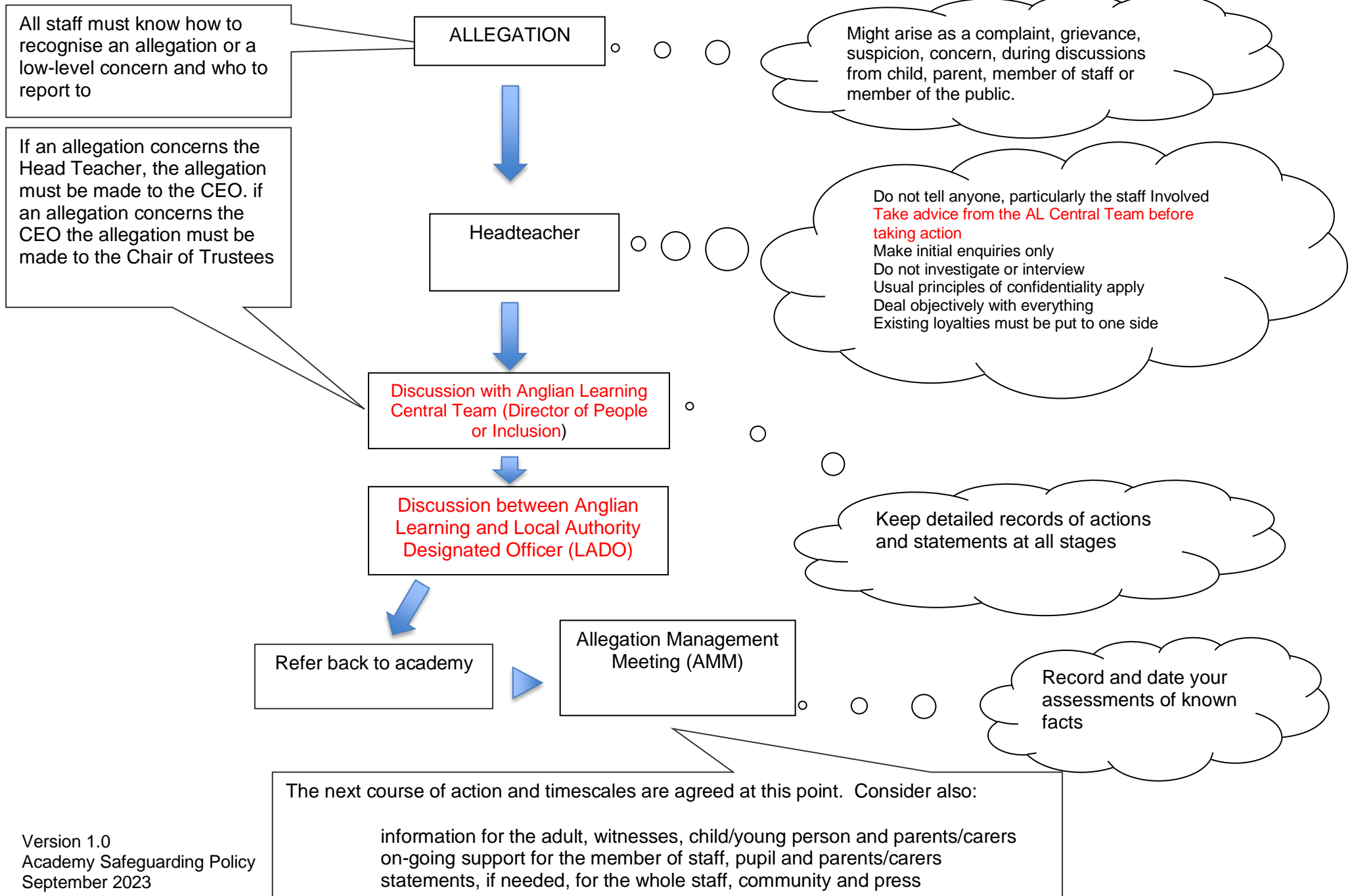
## Dealing with Allegations or Concerns about an Adult Working with Children Appendix D



- Box A:**
- How long has the adult or member of staff worked for you?
  - Have there been any previous concerns raised?
  - Is this a one-off or part of a pattern of behaviour?
  - Has the member of staff previously been given advice in this area?
  - Would an associated pattern of behaviour (if it exists) be seen by others? (How closely do they work with other colleagues?)
  - Might this have been a planned action or event?
  - Could this behaviour be inadvertent? What is the likelihood of this?
  - Could this be the precursor to more concerning behaviour?
  - Did it occur in a 'public' or 'private' place? Was this in academy or out of academy?
  - If electronic devices are involved, have any relevant files been deleted and is there any evidence of this?
  - If this relates to inappropriate language, what is the precise nature of the language used? How inappropriate is it? What was the context – where was this, and who were the listeners? Could this be seen as 'banter' or might it have more serious undertones?

# Managing an Allegation Against a Member of Staff in your Establishment

## Appendix D



### Appendix E: Addendum. Child on child abuse and Sexual Violence and Harassment 2021

#### 1. Aims

All Anglian Learning academies will adopt a whole academy or college approach to safeguarding and child protection and will promote the principle within all settings that child on child abuse, sexual harassment and sexual violence is not acceptable and will not be tolerated.

This will involve everyone in the Trust and its academies, including Trustees, the LGB and all staff, children and young people and their parents or carers. All parties will understand that child on child abuse, sexual violence or sexual harassment will not be passed off as 'banter,' 'part of growing up' or 'having a laugh' and staff will be expected and supported to challenge and report all incidents of concern, however minor they may seem.

Safeguarding procedures with regard to child-on-child abuse, sexual violence and sexual harassment will be transparent, clear, and easy to understand for staff, pupils, parents, and carers. Academy websites and information sharing will make clear to pupils and their families the procedures they can follow if they have concerns or wish to make a disclosure follow.

All allegations and disclosures will be taken seriously and managed without judgement.

All academy leaders, when faced with a report of child-on-child abuse, sexual violence and/or sexual harassment will give immediate consideration as to how best to support and protect the victim and the alleged perpetrator through in-academy provision whilst simultaneously engaging and working with external agencies.

The Relationships Education curriculum in primary academies and the Sex and Relationships curriculum in secondary academies must build a coherent understanding of the nature of healthy relationships and support all pupils to manage their relationships well. Pupils will be taught how to respond to inappropriate and unhealthy attitudes expressed towards them and will learn the sources of support they can access when any associated problems arise.

#### 2. Action following a report of child on child abuse or sexual violence and/or sexual harassment.

All academies will carefully consider any report of child on child abuse, sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the academy's initial response. Where there are concerns that need support, advice, or review beyond academy level the DSL should contact a peer DSL or the relevant Trust Director.

##### 2.1. Important considerations must include:

the ages of the children / young people involved related to the following:

- the developmental stages of the children involved ([Child Sexual Behaviour Tool](#));
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- any power imbalance between those involved. For example, is the alleged perpetrator significantly older, more mature, or more confident;
- whether the victim has a disability or learning difficulty;
- if the alleged incident is a one-off or constitutes a sustained pattern of behaviour;
- if there are ongoing risks to the victim, other children, adult students or academy or college staff;
- what support the parents, carers and families of alleged victims and perpetrators may need and are entitled to;
- any other related issues and wider context.

### **3. Responses to disclosures of child-on-child abuse, sexual violence, and sexual harassment:**

Disclosures of child-on-child abuse, sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Trust academies will prepare for potential disclosures by implementing approaches that include:

- staff and governor training ensuring their academy's approach to managing child on child abuse or sexual harassment and sexual violence is fully understood as is the difference between them;
- pupils learning appropriate attitudes and behaviours through staff modelling, through the RSE curriculum and throughout various aspects of the broader curriculum;
- the academy making clear to pupils and parents the contacts and process for reporting any concerns;
- all staff being trained to manage reports of child-on-child abuse or sexual violence and harassment in accordance with each academy's safeguarding policies and procedures. This training evidenced and recorded;
- effective links between this policy guidance and any other policies that establish the foundation for a calm, considered and appropriate response to any reports of sexual harassment or sexual violence. Including the academy's behaviour, RSE and anti-bullying policies;
- ensuring that allegations will be reported to and overseen by the Designated Safeguarding Lead (or deputy). Appropriate members of the senior leadership team being made aware of how they can best support the DSL and safeguarding team in the event of an investigation of this nature.

#### **3.1 Response to any report from a child or young person will ensure:**

- victims are reassured that they are being taken seriously and that they will be supported and kept safe with immediate effect;

- victims will never be given the impression that they are creating a problem by reporting child on child abuse or sexual violence or sexual harassment;
- victims will never be made to feel ashamed for making a report;
- victims will be informed of all decisions about the next steps and any potential agency involvement;
- alleged perpetrators of sexual harassment and/or sexual violence are kept separate from the victim and are not judged;
- parents and carers of victims and perpetrators are contacted and informed of any allegations in accordance with statutory guidance;
- where a crime of potential crime is disclosed, it is reported to the Police and/or other relevant body as required by law or DfE guidance.

#### **4. Responsibilities - all academy staff must:**

- understand they cannot promise confidentiality at any stage of the management process, especially in the initial stage. (It is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care representative) to discuss the next steps to be taken);
- ensure that the victim understands what the next steps will be and who the information shared will be passed to;
- set clear boundaries, recognising that a child or young person is likely to disclose to someone they trust. This could be any member of the academy or college staff. Staff will always listen carefully, be supportive and respectful of the child or young person whether they are the victim of the alleged perpetrator;
- not ask leading questions and only prompt the child where necessary with open questions – *where, when, what*;
- devote their full attention to the child, recognising that it may be appropriate to make notes during the disclosure/discussion without appearing distracted. (especially if a second member of staff is present);
- only share the information and report with those people who are necessary in order to progress it.

#### **5. Recording disclosures**

Staff will only record the facts as the child or young person presents them. Any records must not reflect the personal opinion of the note taker. All academy Designated Safeguarding Leads (and deputies) must be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation and should only be factual, concise and without bias. All interview notes should be signed by all those present to ensure that they are agreed as an accurate representation of the meeting.

Staff must consider the best way to make a record of the disclosure. In immediate instances, best practice is to wait until the end of a discussion and immediately write up a thorough summary and upload to My Concern or write directly onto the pupil profile on My Concern (this should include both victim and perpetrator).

Staff must ensure that if procedures require that they formally interview a child that this is only done with another member of staff present (ideally one person will be the note taker and the other the interviewer). These two colleagues should meet before the interview to pre-plan questions to ensure that they are not leading and are sensitive. Children and young people should have the option for a parent/carer to be present.



## 5.1 Managing reports.

Designated safeguarding leads and deputies in addition to LGBs and proprietors will be aware that they can access detailed definitions on what constitutes sexual violence and harassment and advice to support their academy in the Department of Education [advice on sexual violence and harassment between children in schools](#). Annex A of this document should be signposted to staff offering links to further support and guidance.

## 6. Online sexual harassment and/or sexual violence:

Where the disclosure and/or reporting includes an online element, all leaders will follow their individual academy policies of searching, screening, and confiscation. They will, as necessary, consult [searching, screening and confiscation at academy](#) and follow the advice of [UKCCIS sexting](#) advice for schools and colleges. Staff must not view or forward illegal images of a child.

In reporting disclosures of online sexual harassment staff must:

- wherever possible manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy with one taking notes of the meeting)
- inform the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report

The above will allow for all academies to make decisions on a case-by-case basis, with the designated safeguarding lead (or deputy) taking a leading role and using their professional judgement, supported by wider agencies, such as children's social care and the police as required.

## 7. Risk assessments.

When there has been a report of sexual violence, the Designated Safeguarding Lead (or a deputy) will make an immediate risk and needs assessment [EST RA for primary academies](#) and [EST RA for secondary academies](#). Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk assessment is not intended to replace any detailed assessments of expert professionals. Any such professional assessments should be used to inform the academy's approach to supporting and protecting their pupils and students and updating their own risk assessment.

Risk assessments must be recorded using MyConcern. They must be added to the victim's and alleged perpetrator's files and should be kept under review. All updates will be uploaded to the individual's files. At all times, the academy should be actively considering the risks posed to all their pupils and students and ensure adequate measures are in place to protect them and keep them safe.

### 7.1 The risk and needs assessment must consider.

- the victim, especially their protection, support and wishes
- the alleged perpetrator and their protection and support
- all other children and young people (and, if appropriate, adult students and staff) at the academy especially any actions that are appropriate to protect them.

- if the alleged perpetrator attends any outside clubs where they could be perceived to be a risk. DSLs should share information on a need-to-know basis with safeguarding representatives of such clubs/teams etc.

Where the victim and alleged perpetrator are in the same year group elements in the risk assessment may include:

- moving the alleged perpetrator to different classes
- informing staff without disclosing details that the children/young people are to be kept separate
- sharing with staff relevant aspects of the risk assessment that will support keeping the victim and perpetrator safe
- ensure the victim and perpetrator know who their 'go to person' in the academy is
- allocate a safe space for the victim and the perpetrator to use as necessary
- allow time and allocate a discreet place for other agencies to visit the victim and the perpetrator in the academy
- consider transitions in corridors
- consider changing facilities
- consider unstructured times such as breaks and lunchtimes
- consider times of arriving at and leaving academy or college sites (are the victim and alleged perpetrator on the same bus, using the same cycle/pedestrian route?)
- consider the potential 'ripple effect' across the year and peer groups and any potential risk in this. For example- the victim's or alleged perpetrator's peers taking actions against either the alleged victim and/or perpetrator.

These considerations are in the best interests of both the victim and alleged perpetrator.

They are not an assumption of guilt by the academy.

The designated safeguarding lead (or a deputy) must ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and / or sexual violence specialists will be required.

### Sharing nudes and semi-nudes: how to respond to an incident

An overview for all staff working in education settings in England

This document provides a brief overview for frontline staff of how to respond to incidents where nudes and semi-nudes have been shared.

**All** such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies.

The appropriate safeguarding lead person should be familiar with the full 2020 guidance from the UK Council for Internet Safety (UKCIS), *Sharing nudes and semi-nudes: advice for education settings working with children and young people* and should **not** refer to this document instead of the full guidance.

#### What do we mean by sharing nudes and semi-nudes?

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

#### What to do if an incident comes to your attention

**Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.**

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal.**<sup>1</sup>
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

#### For further information

Download the full guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (UKCIS, 2020) at [www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people](http://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people).

<sup>1</sup> In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image in order to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).