

Vanguard Learning Trust



As a group of local primary and secondary schools, Vanguard Learning Trust's mission is to serve its local community by providing outstanding, inclusive education. We have a collective purpose and responsibility to provide effective teaching, through a curriculum based on equality of opportunity and entitlement that allows our students to shine both in and out of the classroom. Each school in the Trust has its own ethos, which also complements the Trust's vision and values, and the common aspiration that all students can achieve their potential.

Safeguarding and child protection policy

Part A: Trust-wide

September 2024

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Part A – Trust policy

1. Policy statement

1.1 Purpose

Vanguard Learning Trust (VLT) is committed to safeguarding children and young people, and expects everyone who works for the Trust to share this commitment. Safeguarding and promoting the welfare of children are everyone's responsibility and applies to all employed staff, as well as contracted and supply staff working at any of the Trust's schools and/or central team. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.

1.2 Definitions

Safeguarding and promoting the welfare of children are defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework ([click here](#)).

This definition is taken from the statutory guidance, '*Working together to safeguard children*' (DfE, 2023). As outlined in '*Keeping children safe in education*' (DfE, 2024), 'children' refers to everyone under the age of 18.

It is important to remember that safeguarding and child protection are not the same. Safeguarding is what we do for all children and young people; a proactive endeavour to keep them safe whilst in our care. Child protection describes the interventions and procedures we will carry out for young people who are at risk of serious harm or have been seriously harmed. The term 'children' includes everyone under the age of 18.

1.3 Application

VLT expects that everybody (trustees, governors and all staff, including contracted and supply staff) working in a Trust school, as well as the Trust central team, recognises and understands their safeguarding responsibilities. There is a shared commitment to providing a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of every child.

1.4 Statutory guidance

This policy is based on the statutory guidance provided in the Department for Education's '*Working together to safeguard children*' (updated 2023, [click here](#)) and '*Keeping children safe in education*' (known as *KCSIE*, updated September 2023, [click here](#)). There are four main elements:

- Prevention (eg. positive, supportive, safe school/learning provider culture, curriculum and pastoral opportunities for children/vulnerable learners, safer recruitment procedures);
- Protection (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
- Support (for all children/learners, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
- Working with parents/families and other agencies (to share information and ensure appropriate actions are undertaken).

1.5 Annual expectation

All members of the Trust are expected to read, at the start of each school year or at the time of appointment as part of their induction, the following documents:

- This Safeguarding Policy
- KCSIE Part 1 (or for some staff Annex A, if deemed appropriate) and Annex B
- Staff code of conduct for the school they are employed in
- Behaviour policy for the school they are employed in
- Know the name and roles of the Designated Safeguarding Lead (DSL) and their deputies for the school they are employed in
- Know how to raise a safeguarding concern with the DSL or other member of the school's wider safeguarding team
- Each school's Designated Safeguarding Lead and members of the school's wider safeguarding team must have due regard to the guidance contained within other relevant safeguarding documentation, primarily '*Working together to safeguard children*' ([click here](#)) and the *London Safeguarding Children Partnership Threshold Document: Continuum of Help and Support* ([click here](#)).

2. Aims

2.1 Aims

The aims of this policy are to:

- establish a safe environment in which children can learn and develop;
- provide all members of the Trust with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children;
- ensure consistent good practice across the Trust; and
- demonstrate the Trust's commitment to safeguarding children.

2.2 Prevention of harm

The Trust recognises that its schools play a significant part in the prevention of harm by providing students with good lines of communication with trusted adults and an ethos of protection. Each school in the Trust will therefore:

- establish and maintain an ethos where students feel secure, are encouraged to talk and are always listened to;
- ensure that all students know there is an adult in the school whom they can approach if they are worried or in difficulty; and
- include in the curriculum opportunities that equip students with the skills they need to stay safe from harm and to know who they should turn to for help.

2.3 Working together to safeguard children

All schools within the Vanguard Learning Trust are committed to the expectations set out in '*Working together to safeguard children*'. These expectations are ensure that all practitioners:

- share the same goals to help keep children safe;
- learn with and from each other;
- have what is needed to help protect families;
- acknowledge and appreciate differences; and
- feel able to challenge each other where necessary.

3. Trust personnel

The chief executive officer is Dr Martina Lecky and the safeguarding-lead trustee is Mrs Pauline Nixon. The Trust safeguarding lead is Adam Walthaus. All Trust staff have all undergone the appropriate safeguarding checks, which are recorded on Trust's single central record (SCR); this is also linked to each school's SCR.

4. Equality Statement

VLT's Equality policy ensures that the Trust promotes a fully inclusive environment where all members of the community are free from any form of discrimination which relates to its statutory safeguarding duties and that there is adherence to protected characteristics as outlined in the Equality Act 2021. This includes compliance with the Human Rights Act 1998 and Public Sector Equality Duty, paragraphs 83-93.

5. Contextual safeguarding

All Trust staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of this environment. This is known as contextual safeguarding, which simply means that assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and deputies) should consider the context within which such incidents and/or behaviours occur. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families (eg. sexual exploitation, criminal exploitation, serious youth violence). Children's social care assessments should consider such factors, so it is important that schools in the Trust provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

6. Roles and responsibilities

6.1 Designated safeguarding lead (DSL)

6.1.1 Overview

Each school in the Trust has a DSL, who is also a member of the school's senior leadership team. The DSL takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). All deputy DSLs are trained to the same standard as the DSL. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL for each individual school in the Trust. This responsibility should not be delegated. The DSL and any deputies should liaise with the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for the police area in the local authority area) and work with other agencies in line with *'Working together to safeguard children'*. During term time, the DSL and/or a member of the safeguarding team should be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. It is a matter for individual schools in the Trust to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

6.1.2 Responsibilities of the DSL

The DSL is expected to:

- keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program;
- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service (DBS) as required;
- refer cases where a crime may have been committed to the police as required;

- liaise with the headteacher to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; this should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019;
- liaise, as required, with the Local Authority Designated Officer (LADO) in cases which concern a staff member;
- liaise with staff on matters of safety and safeguarding; and
- act as a source of support, advice and expertise for all staff.

DSLs should help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including those with a social worker) are experiencing, or have experienced, with teachers and other staff, for example:

- making sure that staff know who these children are, understand their academic progress and attainment, and maintain a culture of high aspirations for them;
- supporting teaching staff to identify the challenges that children in this group might face, and the additional academic support and adjustments that they could make to best support them.

6.1.3 Training

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via the Trust's Safeguarding Padlet, e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

6.1.4 Raise awareness

The DSL should:

- ensure the Trust's safeguarding and child protection policy, including Parts A and B, is known, understood and used appropriately;
- ensure the Trust's safeguarding and child protection policy, including Parts A and B, is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- work with the school/Trust IT staff to ensure that filtering and monitoring systems are fit for purpose and that there is a clear procedure to respond to issues and safeguarding concerns, as well as fulfilling responsibilities under the Prevent duty. DSLs will ensure that all staff understand their responsibilities in this area, via information sharing during training and annual updates. The DSL will ensure that cyber security is robust by completing an online review;
- ensure that the school's attendance policy is clear about the safeguarding risks for children absent or missing from school, including those absent on repeat occasions/for prolonged periods. This should include how staff supporting attendance work with the DSL;
- periodically review procedures for responding to safeguarding concerns about other organisations and individuals using the school site and work with relevant staff to ensure that these are clearly stated in any lettings policy and hirings contracts;
- ensure the Trust's safeguarding and child protection policy, including Parts A and B, is available publicly and parents are aware of the fact that referrals about suspected abuse, neglect and/or exploitation may be made and the role of the school in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

The full job descriptions of the DSL, deputies and staff who provide support are available in each school.

6.1.5 Working with parents/carers

The 2023 update to '*Working together to safeguard children*' guidance sets out four principles that professionals should follow when working with parents and carers. DSLs and wider safeguarding teams will hold these principles with due regard in their work:

- effective partnership and the importance of building strong, positive, trusting and cooperative relationships;
- respectful, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents and carers;
- empowering parents and carers to participate in decision making by equipping them with information, keeping them updated and directing them to further resources; and
- involving parents and carers in the design of processes and services that affect them.

6.2 Headteachers

Each headteacher in the Trust is expected to:

- ensure that the Trust's safeguarding and child protection policy, including Parts A and B, and procedures are implemented and followed by all staff;
- allocate sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings; and
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures;

6.3 Trustees and local governing bodies

All trustees and local governing bodies for each school will ensure that each school has:

- a DSL for safeguarding and child protection, who is a member of the senior leadership team and has undertaken the appropriate training (including online safety and an understanding of the school's filtering and monitoring system);
- a safeguarding and child protection policy and procedures that are consistent with Local Safeguarding Children Board requirements, reviewed annually and are available on the school's website;
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the headteacher;
- safer recruitment procedures that include the requirement for appropriate checks in line with national guidance;
- a training strategy that ensures all staff, including the headteacher, receive child protection training, with refresher training at three-yearly intervals. The DSL should receive refresher training at two-yearly intervals;
- arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for child protection;
- a nominated member of the local governing body (LGB) (normally the chair) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the headteacher;
- appropriate safeguarding and child protection (including online) training in place for all governors and trustees at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole-school approach to safeguarding. Their training should be regularly updated; and
- awareness of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. This includes an understanding that their duty under the Equality Act includes reasonable adjustments for children with disabilities.

6.4 School staff in the Trust

All staff have a responsibility to provide a safe environment in which children can learn and all staff should be prepared to identify children who may benefit from early help. Early help means providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Any staff member who has a concern about a child's welfare should follow the referral processes set out in Part B of the Trust's safeguarding and child protection policy. Staff should expect to support social workers and other agencies following any referral. All staff should be aware of systems within their school that support safeguarding and these should be explained to them as part of staff induction.

All staff should:

- receive appropriate safeguarding and child protection training (including around online safety and an understanding of the school's filtering and monitoring system) which is regularly updated;
- be aware of the school's culture of safeguarding and that there are responsibilities in and outside of school, as well as online and offline;
- know what to do if a child tells them he/she is, or might be being abused, neglected or exploited;
- know how to manage the requirement to maintain an appropriate level of confidentiality;
- never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child;
- refer all concerns/incidents reported to them to the DSL/member of the safeguarding team;
- be aware that safeguarding incidents could happen anywhere and be alert to possible concerns then being raised in school;
- raise concerns with children's social care directly if they believe there is a risk of immediate serious harm to the child. This would only be recommended if staff are unable to contact the safeguarding team directly, for example on return from a school trip in the early hours of the morning, or if they believe that the safeguarding team have not contacted social care following a disclosure/serious concern. Although both of these situations are highly unlikely it is important that staff remember that the safety of children is of paramount importance; and
- press for reconsideration if a child's situation does not appear to be improving following a referral.

Safeguarding concerns about adults in an individual school should be made directly to the local headteacher. Concerns about the headteacher should be made to the chair of the LGB. Concerns about safeguarding practices in a school should be made to a senior member of staff, to VLT CEO or using the Trusts whistleblowing procedures outlined in Sections 15 and 16 for detail.

6.5 Contracted and supply staff working in a Trust school

All schools will ensure that any contracted and supply staff are made aware of the school's safeguarding systems and know what to do should they have a concern about a child or another member of staff or safeguarding practices at the school they are working in.

7. Staff and governor training

All staff in the Trust must undergo safeguarding and child protection training at induction. This training should be regularly updated. In addition, all staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Trustees and local governing bodies will receive annual safeguarding training and additional sessions will be held on specific topics as required. This should be strategically planned so that all governors develop expertise over time, so they actively monitor and check on the effectiveness of safeguarding arrangements in their schools.

8. What staff should do if they have concerns about a child

Staff in the Trust are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If staff have any concerns about a child's welfare, they should act on them immediately and follow their individual school's referral process. The DSL or a deputy should always be available to discuss safeguarding concerns during school hours. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. The Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. If a member of staff has any doubt about sharing information, they should speak to the DSL or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of any child attending a VLT school.

8.1 If a child discloses information to a member of staff

It takes a lot of courage for a child to disclose that they are being abused, neglected or exploited. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. If a child talks to staff about any risks to their safety or wellbeing, the staff member will need to let them know that the information **must** be passed on; staff are not allowed to keep secrets. The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, such as out of school hours, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible. Part B outlines the school reporting systems and procedures and includes contact details.

8.2 During a conversation with the child:

There are certain key things that staff can say and do when a child discloses alleged abuse, which includes the following:

- allow them to speak freely;
- do not promise confidentiality. If what a child discloses is an allegation of abuse, staff have a duty to tell and will then have to betray the child's trust. Always explain that the school will need to talk to a designated member of staff who will keep the issue as confidential as possible;
- remain calm and do not overreact – the child may stop talking if they feel the information they are disclosing is upsetting to staff;
- take what the child says seriously. Do not show disbelief and keep an open mind. It is more likely than not that the child is telling the truth;
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'You are doing the right thing in talking to me';
- do not be afraid of silences – remember how hard this must be for the child;
- listen, only asking questions when necessary to clarify. Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child's parent think about all this;
- do not criticise the alleged abuser. Often an abused child has very confused feelings about the perpetrator and may still love the person whilst hating what has been done. Judgemental comments can evoke a sense of bewildering loyalty;
- give reassurance once the child has finished relating what has happened; this kind of thing has happened to others and there are people who can help and/or no-one has to go through this experience alone;

- tell the child what will happen next as far as possible. Answer any questions honestly; if staff are unable to answer a question, they should say this, and that they will try to find out;
- never promise anything that cannot be delivered for certain. For example, do not promise that everything will work out fine or that the child will never have to face the abuser again. Staff can only promise to do their best to help; and
- write up the conversation as soon as possible and hand it to the designated person without delay, as it may not be appropriate for the child to return home at the end of the school day.

8.3 Staff support

Staff should seek support from the DSL, their line manager or a senior member of staff if they feel distressed or upset.

9. Notifying parents and carers

Each school in the Trust will normally seek to discuss any concerns about a child with their parents and carers and this must be handled sensitively. However, if the individual school believes that notifying parents and carers could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's social care and parents may not be contacted.

10. Early Help assessment

10.1 What staff should look out for:

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

- goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is a privately fostered child.

Abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff should be aware of indicators of abuse, neglect and exploitation (**Appendix 1**) so that they are able to identify cases of children who may be in need of help or protection. They should be mindful that 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, including where they see, hear or experience its effects. Staff should also be cognisant of safeguarding issues (**Appendix 2**).

10.2 Considering family needs in the context of early help

In line with the guidance contained within the 2023 update to '*Working together to safeguard children*', assessments for early help should consider how the needs of different family members impact each other. This includes needs relating to education, mental and physical health, financial stability, housing,

substance use and crime. Specific needs should be considered such as disabilities, those whose first language isn't English, fathers or male carers, and parents who identify as LGBTQ. Early help services may focus on improving family functioning and developing the family's capacity to establish positive routines and solve problems. Where family networks are supporting the child and parents, services may take an approach that enables family group decision making, such as family group conferences.

10.3 Taking action

Safeguarding professionals should work closely with education and childcare settings to share information, identify and understand risks of harm, and ensure children and families receive timely support. Key points to remember for taking action are as follows:

- to report concerns to the DSL or another member of the safeguarding team as quickly as possible, and certainly before the end of the school day;
- if a member of the safeguarding team is not available, ensure the information is shared with the most senior person in the school that day and ensure action is taken to report the concern to children's social care;
- staff should not start their own investigation;
- to share information on a need-to-know basis only – not to discuss the issue with colleagues, friends or family;
- to complete a record of concern;
- staff should seek support if they are distressed; and
- in an emergency, take the action necessary to help the child; for example, call 999.

11. Statutory children's social care assessments and services

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process and the expectations set out in KCSIE. A children's social care assessment should consider where children are being harmed in contexts outside the home, so it is important that Trust schools provide as much information as possible as part of the referral process so that all the available evidence is considered to enable a contextual approach to address such harm. This is outlined in section 17 and 47 of the Children Act 1989 ([click here](#)).

All Trust schools should ensure they do all they can to support the assessment and, if the child's situation does not appear to be improving, follow local escalation procedures.

12. Multi-agency working

Schools in the Trust have a pivotal role to play in multi-agency safeguarding arrangements. Local governing bodies should ensure that each school in the Trust contributes to multi-agency working in line with statutory guidance 'Working Together to Safeguard Children'. Locally, the 3 safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for the police area in the local authority area) will make arrangements to work together to safeguard and promote the welfare of local children. Trust schools must ensure they have in place robust arrangements for multi-agency working, which is outlined in Part B of the policy.

13. Information sharing

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation. The Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children. Each school in the Trust must ensure that when children leave, their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt. This should be transferred separately from

the main student file. Receiving schools should ensure key staff such as the DSL and SENCO are aware as required. In addition to the child protection file, the DSL should also consider whether it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

14. Child leaving a Trust school

If a student leaves a Trust school, the school must ensure:

- where the name of the next school is known, the DSL will alert the headteacher and/or DSL ahead of the child's arrival about any safeguarding concerns; and
- their safeguarding file is sent securely to their receiving school once attendance has been confirmed.

If the next school is not known, the procedures for children missing from education (CME) must be followed and in the case of a child of any concern, children's services are alerted (see details in Part B for school procedures). Each Trust school is required to have these procedures documented in school policy. If the student is home-educated their safeguarding file is archived.

15. What staff should do if they have concerns about another member of staff supply/contracted staff or volunteer

15.1 Introduction

All schools in the Trust must have a policy and procedures, that align to those set out in KCSIE part 4, for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. This includes all members of staff, supply teachers, volunteers and contractors. This includes both:

- Allegations that may meet the harm threshold.
- Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this guidance as 'low-level concerns'.
- Concerns that occur inside and outside of school, online as well as offline.

15.2 Allegations that may meet the harm threshold

This applies where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers, contractors and supply teachers) posing a risk of harm to children, this should be referred to the individual school's headteacher. Where there are concerns/allegations about the headteacher, this should be referred to the individual school's chair of governors or the Trust's CEO. Employees can also contact the NSPCC whistleblowing advice line on 0800 028 0285 or the key Trust personnel named in Section 3.

15.3 Concerns about agency and contracted staff

A school may have to consider an allegation against someone not directly employed by the school and where the usual disciplinary procedures don't fully apply, like supply staff provided by an agency. The

school should not decide to stop using the supply teacher due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. The LGB should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries, but the school will usually take the lead as the agency won't be able to collect the necessary information. When using an agency, they should be informed of the process for managing allegations, including inviting the agency's HR manager or equivalent to meetings and keeping them up to date with information about your policies. Allegations are reported by the DSL to the LADO – contact details are: Referral email lado.contact@hillington.cjsm.net

15.4 Low-level concerns

This applies to concerns which do not meet the harm threshold, referred to as 'low-level' concerns. The Trust actively promotes an open and transparent culture in which all concerns about all adults (members of staff, governors, supply teachers, volunteers and contractors) working in or on behalf of any Trust school are dealt with promptly and appropriately. This should enable early identification of inappropriate, problematic or concerning behaviour, minimise the risk of abuse, and ensure that adults working in Trust schools are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of VLT.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating students.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. Schools will keep a log of any low-level concerns raised.

15.5 Staff code of conduct

The Trust actively promotes across all schools the importance of sharing low-level concerns and a culture of openness, trust and transparency. Each school should make it clear what a low level concern is and set out within their staff code of conduct how the school's values and expected behaviour are lived, monitored and reinforced constantly by all staff.

Each school will achieve the purpose of their low-level concerns policy and procedure by:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in the school or college safeguarding system.

15.6 Staff who are the subject of an allegation

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, it is accepted that some adults do pose a serious risk to children's welfare and safety and in such cases all schools in the Trust must act on every allegation made. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

15.7 Non-recent allegations

When an adult makes an allegation to a Trust school that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will co-ordinate with local authority children social care and the police. Abuse can be reported no matter how long ago it happened. The chair of the trustees must be informed if such an allegation is made.

16. What staff should do if they have concerns about safeguarding practices

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. Appropriate whistleblowing procedures should be put in place for each individual school as outlined in the VLT Whistleblowing Policy. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#);
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 or email: help@nspcc.org.uk.

17. Children at increased risk and/or are more vulnerable

17.1 Children missing from education (CME)

All staff in the Trust should be aware that CME, particularly unexplainable and/or persistent absences from education, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse, neglect and/or exploitation, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their individual school's unauthorised absence and children missing from education procedures. Each individual school should monitor attendance carefully and address poor or irregular attendance without delay. All schools should follow up with parents/carers when students are not at school. This means the school needs to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

17.2 Children who are homeless

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes into the local housing authority

so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the local housing authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

17.3 Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. Each individual school in the Trust must appoint a designated teacher and should work with local authorities to promote the educational achievement of registered students who are looked after or previously looked after.

17.4 Children with special educational needs and disabilities

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

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

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

17.5 Children involved in a child protection issue

Child abuse, neglect and exploitation can be devastating for the child and can also result in distress and anxiety for staff who become involved. All schools in the Trust will support the children, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a child, a separate link person will be nominated to avoid any conflict of interest;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of help lines, counselling or other avenues of external support;
- following the procedures laid down in the whistle blowing, complaints and disciplinary procedures; and
- co-operating fully with relevant statutory agencies.

17.6 Children requiring mental health support

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. Each Trust school should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. The Trust expects each school to have a documented mental health strategy in place, that is shared with all staff. Each school should have appointed a named mental health

lead(s) and ensure that they and other staff are appropriately trained for their roles in mental health issues and understand the school systems for raising concerns so help can be put in place. Schools are expected to raise awareness with students, so they understand the importance of mental health through a Relationships Education curriculum and ensure each child knows how to seek help, when needed. Details on the school's approach to mental health, together with sources of information and support, should be made available on the school website.

17.7 Children with health issues

Certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Trust schools should ensure that arrangements to care for children with specific health issues are appropriate and well managed, with clear recognition of the need for vigilance in relation to safeguarding of those children. Schools also recognise that the routine care and treatment of students who are unwell or injured during the school provide opportunities to be vigilant in relation to safeguarding. Each school should have in place a documented policy and practice to ensure staff are able to recognise and report concerns. School leaders should routinely look for patterns and trends in school records of the care and treatment of unwell or injured students, and take appropriate actions.

17.8 Children who are lesbian, gay, bisexual, trans, queer or questioning, intersex or asexual (LGBTQIA+)

The fact that a child or a young person may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, children who are LGBTQIA+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+. The Trust recognises that risks can be compounded where children who are LGBTQIA+ lack a trusted adult with whom they can be open. It is therefore vital that each school and its members of staff endeavour to reduce the additional barriers faced and provide a culture for them to speak out or share their concerns with members of staff. Staff will support children or young people who are LGBTQIA+ on a case-by-case basis, ensuring that the child's best interests are kept front and centre.

17.9 Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders (NICCO) ([click here](#)) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

18. The use of reasonable force

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Should a member of staff be in a position where they use 'reasonable force' they must inform their school's DSL and provide a written report. All Trust schools must have in place a use of positive handling in their behaviour policies, ensure staff are trained in its use, and this is kept current.

19. Staff wellbeing

The Trust recognises that safeguarding is everyone's responsibility and that there is a duty of care to the professionals working in Trust schools. The Education Support Partnership is a charity providing mental

health and well-being support services to all education staff and organisations. **Education Support Partnership Helpline; 0800 562 561** (Everyday, 24 hours a day) Staff can also text on 07909 341229 or email support@edsupport.org.uk. Staff also have access to ACS Partnership's Health Assured Programme ([click here](#) for details).

20. Safer recruitment

20.1 Introduction

All schools in the Trust should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. Each school in the Trust is responsible for the recruitment of their staff and must have written recruitment and selection policies and procedures in place. **Appendix 3** has a list of what to include in the recruitment policy. The School Staffing (England) Regulations 2009 require governing bodies of maintained schools to ensure that at least one of the persons who conducts an interview has completed safer recruitment training. The Trust expects all schools to comply with this.

20.2 The single central record

All schools in the Trust must maintain their own SCR detailing checks carried out in each school. The SCR must cover the following people:

- all staff, including teacher trainees on salaried routes;
- agency and third party supply staff who work at the school;
- LGB members;
- Trustees and VLT staff;

The SCR must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check;
- a barred list check;
- an enhanced DBS check/certificate;
- a prohibition from teaching check;
- further checks on people who have lived or worked outside the UK
- a check of professional qualifications, where required;
- a check to establish the person's right to work in the United Kingdom.
- a section 128 check (for management positions for independent schools including academies and free schools).

20.3 Agency and third party (supply) staff

Trust schools must also include whether written confirmation has been received that the employment business supplying the member of agency or supply staff has carried out the relevant checks and obtained the appropriate certificates. This includes the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff. Confirmation of these checks should be noted on the SCR, together with details on their identity check on the first day of arrival in the school.

20.4 Trainee/student teachers

Where applicants for initial teacher training are salaried by the Trust, the individual school must ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including barred list information) must be obtained. Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools in the Trust should obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children. There is no requirement

for the school to record details of fee-funded trainees on the SCR. However, the Trust advises schools to do so.

20.5 Volunteers

Any Trust school may decide to make use of volunteers. Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity, A school should undertake a written risk assessment for each volunteer and use their professional judgement and experience when deciding what checks, if any, are required. The school should obtain an enhanced DBS check (which should include children's barred list information) for all volunteers who are new to working in regulated activity with children. If at any time the school has any concerns about an existing volunteer, they should consider obtaining a new DBS check at the level appropriate to the volunteering role.

20.6 Contractors

If a Trust school uses contractors to provide services, they should set out their safeguarding requirements in the contract between the organisation and the school. The school should ensure that any contractor, or any employee of the contractor, who is to work at the school, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). Under no circumstances should a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children in a Trust school. VLT places responsibility for determining the appropriate level of supervision depending on the circumstances of the individual school. If an individual working at a school or college is self-employed, the school or college should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account. The identity of contractors on their first arrival at the school must be checked and a formal record of the date of this check kept on the SCR, together with details of their DBS check, if they have one.

20.7 Governance

Each school in the Trust must obtain an enhanced DBS check for all members of the LGB and check that members are not disqualified from taking part in the management of the school because of a section 128 direction. Details of these checks must be recorded on the SCR. The same must be done for trustees and members and these details must be on the Trust's SCR.

20.8 Ongoing vigilance

If a school in the Trust has concerns about an existing staff member's suitability to work with children, the individual school should carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the Trust moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity must be carried out.

20.9 Retention of documents

Trust schools do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the SCR. To comply with the requirements of the Data Protection Act 2018, Trust schools may retain a copy of the DBS but they should only do so if there is a valid reason and it should not be kept for longer than six months. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.

21. Curriculum opportunities to teach safeguarding

All schools in the Trust must consider opportunities to teach safeguarding. In line with statutory requirements this must include:

- covering relevant issues through Relationships Education (RE) and Relationships and Sex Education (RSE)
- teaching online safety
- personal, social and health education
- spiritual, moral, cultural and special education

The Trust views these opportunities for students to learn how to keep themselves safe as essential. All schools in the Trust are required to:

- have in place an RE/RSE policy and set out the school's approach to its content, delivery and assessment;
- follow the DfE guidelines for teaching online safety in schools and set this out in relevant policies; and
- take account of the school's context to ensure that students are age-appropriately taught about potential risks, self-assessment of risk and how to mitigate risks.

In addition, within the context of each school, students will be provided with information to assist their transition into the next stage of their education.

22. Online safety

22.1 Introduction

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults;
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If staff feel students, students or staff are at risk, it should be reported to the Anti-Phishing Working Group (<https://apwg.org/>) and to the DSL.

Online safety, including an understanding of the school's filtering and monitoring system, must be a running and interrelated theme of the whole-school approach to safeguarding and should be reflected as required in all relevant policies and across the curriculum.

22.2 Policy and practice

Each school in the Trust must have in place a policy for online safety. This must include details of:

- roles and responsibilities of leaders, staff, governors, students and parents and carers
- consider how each of the 4Cs are covered and approached across the school
- filtering and monitoring
- overblocking and how staff can request access to filtered website as part of their routine teaching
- teaching online safety
- staff and governor training in online safety
- information security and access management
- sources of support for staff and parents and carers on keeping children safe when online
- mobile phones and social media usage
- use of personal devices by staff
- use of pupil devices in school
- the annual review of online safety

22.3 Staff training

All staff and governors should undertake annual update training in online safety to ensure they are fully conversant with the current risks posed by children when using online technologies. Topics could include: social media; searching the internet; texting; gaming; scams; grooming; use of images; online harmful sexual behaviours; and reputational damage.

22.4 Filters and monitoring

Each school in the Trust should ensure that they have appropriate filters and monitoring systems in place. The appropriateness of any filters and monitoring systems are a matter for individual schools and are outlined in Part B of this policy. Filtering and monitoring is not solely the responsibility of the school's IT provider or server; the DSL will have a lead role in ensuring that filtering and monitoring systems are fit for purpose and will have a clear procedure to respond to issues and safeguarding concerns, as well as responsibilities under the PREVENT duty. DSLs will ensure that all staff understand their responsibilities in this area, via information sharing during training and annual updates. The DSL will ensure that cyber security is robust by completing an online review.

The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like: UK Safer Internet Centre: appropriate filtering and monitoring. Whilst filtering and monitoring is an important part of the online safety picture for schools and colleges to consider, it is only one part. Many children have unlimited and unrestricted access to the internet via 3G and 4G in particular and each individual school in the Trust should carefully consider how this is managed on their premises.

23. Remote education

Each Trust school should have in place a policy for remote education, which includes the arrangements for the safeguarding of children while they are learning from home. Schools are likely to be in regular contact with parents and carers. Any communications should be used to reinforce the importance of children being safe online. Schools should:

- provide information to parents and carers to help them understand what systems the school has in place to filter and monitor online use.
- Inform parents and carers of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

24. Alternative provision

Where a school in the Trust places a student with an alternative provision provider, the individual school continues to be responsible for the safeguarding of that student, and should be satisfied that the provider meets the needs of the student. Schools should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. Schools should have in place policy and protocols on the use of alternative provision, and how the school will ensure the safeguarding of these students. Schools should ensure that any students placed in alternative provision follow the RE/RSE curriculum of their school.

25. Elective home education

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carers has expressed their intention (in writing) to remove a child from school with a

view to educating at home, Trust schools are expected to work with the LA and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

26. Use of school premises

Where school facilities/premises are hired or rented out by organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) Trust schools should ensure that appropriate arrangements are in place to keep children safe. When services or activities are provided by the LGB, under the direct supervision or management of their school, the school arrangements for child protection will apply. However, where services or activities are provided separately by another body, the LGB should seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend college. Schools should include a statement of their approach to the use of their premises/facilities and safeguarding arrangements in Part B.

27. Children staying with host families

If a school in the Trust makes arrangements for their students to be provided with care and accommodation by a host family to whom they are not related, for example, as part of a foreign exchange visit or sports tour, they should consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay. See Annex E of 'KCSIE' for further details.

28. Private fostering

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

29. Safeguarding monitoring arrangements

The Trust's safeguarding lead will monitor the safeguarding arrangements in each school, through school reports and meetings and visits to school to meet with senior leaders, ascertain pupil and staff views and scrutinise school documentation. More information can be found in the Trust's Safeguarding Forum Handbook ([click here](#)). Both Parts A and B of this policy will be reviewed at least annually. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures. All Trust staff will be informed of any changes made. Each school should have proactive monitoring arrangements in place to ensure the effectiveness of the safeguarding systems. The DSL and headteacher will provide regular reporting on safeguarding activity and systems to the safeguarding lead, as well as their LGB and trustees. Reports will not include details of individual children's situations or identifying features of families as part of their oversight responsibility. Schools are expected to adopt the following approaches to the monitoring of safeguarding arrangements.

This could include: meetings with the DSL, visits to school, ascertaining the views of staff, students and parents through discussions and/or surveys, use of an audit tool, asking all governors to ask a safeguarding

question during meetings with leaders/staff on other aspects of school life, termly checks of the SCR, review of school data and use of an external consultant.

Approval / revision history

Revision date	By	Summary of Changes Made
June 2024	AWA	Added information from ' <i>Keeping children safe in education</i> ' (2024).
February 2024	AWA	Added information about changes to statutory guidance: <ul style="list-style-type: none"> - '<i>Working together to safeguard children</i>' (2023) - Mandatory reporting laws re child sexual abuse (upcoming, in Appendix 2) Link added to Safeguarding Forum Handbook Pending update: guidance to support trans students Language tweaks and updated links
July 2023	BoT	Updated for September 2023 KCSIE
July 2022	BoT	Updated for September 2022 KCSIE
September 2021	BoT	Update for September 2021 KCSIE
September 2020	BoT	Update for September 2020 KCSIE

Part B – local schools

Please see the website of the individual schools for details of their local safeguarding contexts and procedures.

Secondary schools

- Ruislip High School ([click here](#))
- Vyners School ([click here](#))

Primary schools

- Field End Junior School ([click here](#))
- Hermitage Primary School ([click here](#))
- Ryefield Primary School ([click here](#))

Appendices

Appendix 1: Indicators of abuse, neglect and exploitation

Appendix 2: Safeguarding Issues

Appendix 3: What schools must include in recruitment policy

Appendix 4: Self harm and suicide decision making toolkit

Appendix 1: Indicators of abuse, neglect and exploitation

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, including where they see, hear or experience its effects. 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.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	
Indicators in the child	
Bruising	<p>It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence or an adequate explanation provided:</p> <ul style="list-style-type: none"> • Bruising in or around the mouth; • Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive); • Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas; • Variation in colour possibly indicating injuries caused at different times; • The outline of an object used e.g. belt marks, hand prints or a hair brush; • Linear bruising at any site, particularly on the buttocks, back or face; • Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting; • Bruising around the face; • Grasp marks to the upper arms, forearms or leg; • Petechial haemorrhages (pinpoint blood spots under the skin.) Commonly associated with slapping, smothering/suffocation, strangling and squeezing.
Fractures	<p>Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the parents'/carers being aware of the child's distress. If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture. There are grounds for concern if:</p> <ul style="list-style-type: none"> • the history provided is vague, non-existent or inconsistent; • there are associated old fractures; • medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement. <p>Rib fractures are only caused in major trauma such as in a road traffic accident, a severe shaking injury or a direct injury such as a kick.</p> <p>Skull fractures are uncommon in ordinary falls, i.e. from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over 2 to 3 hours. All fractures of the skull should be taken seriously.</p>
Mouth Injuries	<p>Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to</p>

	the cheeks and around the mouth. Rarely, there may also be grazing on the palate.
Poisoning	Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or guardian, but it may be self harm even in young children.
Fabricated or Induced Illness	<p>Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their guardian. Possible concerns are:</p> <ul style="list-style-type: none"> • Discrepancies between reported and observed medical conditions, such as the incidence of fits; • Attendance at various hospitals, in different geographical areas; • Development of feeding / eating disorders, as a result of unpleasant feeding interactions; • The child developing abnormal attitudes to their own health; • Non organic failure to thrive - a child does not put on weight and grow and there is no underlying medical cause; • Speech, language or motor developmental delays; • Dislike of close physical contact; • Attachment disorders; • Low self-esteem; • Poor quality or no relationships with peers because social interactions are restricted; • Poor attendance at school and under-achievement.
Bite Marks	<p>Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.</p> <p>A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.</p>
Burns and Scalds	<p>It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded.</p> <p>Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid. It is important to be mindful of previous burns/scalds scars which did not have appropriate treatment or adequate explanation.</p>
Scars	A large number of scars or scars of different sizes or ages, or on different parts of the body, or unusually shaped, may suggest abuse.

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

Indicators in the child:	<ul style="list-style-type: none"> • Developmental delay; • Abnormal attachment between a child and parent/guardian e.g. anxious, indiscriminate or no attachment; • Aggressive behaviour towards others; • Child scapegoated within the family; • Frozen watchfulness, particularly in pre-school children; • Low self-esteem and lack of confidence; • Withdrawn or seen as a 'loner' - difficulty relating to others; • Over-reaction to mistakes; • Fear of new situations; • Inappropriate emotional responses to painful situations; • Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking); • Self-harm; • Fear of parents being contacted; • Extremes of passivity or aggression; • Drug/solvent abuse; • Chronic running away; • Compulsive stealing; • Low self-esteem; • Air of detachment – ‘don’t care’ attitude; • Social isolation – does not join in and has few friends; • Depression, withdrawal; • Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention; • Low self-esteem, lack of confidence, fearful, distressed, anxious; • Poor peer relationships including withdrawn or isolated behaviour.
Indicators in the parent:	<ul style="list-style-type: none"> • Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse; • Abnormal attachment to child e.g. overly anxious or disinterest in the child; • Scapegoats one child in the family; • Imposes inappropriate expectations on the child e.g. prevents the child’s developmental exploration or learning, or normal social interaction through overprotection; • Wider parenting difficulties may (or may not) be associated with this form of abuse.
Indicators in the family/environment	<ul style="list-style-type: none"> • Lack of support from family or social network; • Marginalised or isolated by the community; • History of mental health, alcohol or drug misuse or domestic violence; • History of unexplained death, illness or multiple surgery in parents and/or siblings of the family; • Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

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

acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Indicators in the child:

Physical presentation	<ul style="list-style-type: none"> • Urinary infections, bleeding or soreness in the genital or anal areas; • Recurrent pain on passing urine or faeces; • Blood on underclothes; • Sexually transmitted infections; • Vaginal soreness or bleeding; • Pregnancy in a younger girl where the identity of the father is not disclosed and/or there is secrecy or vagueness about the identity of the father; • Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.
Emotional/behavioral presentation:	<ul style="list-style-type: none"> • Makes a disclosure; • Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit; • Inexplicable changes in behaviour, such as becoming aggressive or withdrawn; • Self-harm - eating disorders, self-mutilation and suicide attempts; • Poor self-image, self-harm, self-hatred; • Reluctant to undress for PE; • Running away from home; • Poor attention / concentration (world of their own); • Sudden changes in school work habits, become truant; • Withdrawal, isolation or excessive worrying; • Inappropriate sexualised conduct; • Sexually exploited or indiscriminate choice of sexual partners; • Wetting or other regressive behaviours e.g. thumb sucking; • Draws sexually explicit pictures; • Depression.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Indicators in the child:

Physical presentation	<ul style="list-style-type: none"> • Failure to thrive or, in older children, short stature; • Underweight; • Frequent hunger; • Dirty, unkempt condition; • Inadequately clothed, clothing in a poor state of repair; • Red/lilac mottled skin, particularly on the hands and feet, seen in the winter due to cold; • Swollen limbs with sores that are slow to heal, usually associated with cold injury • Abnormal voracious appetite; • Dry, sparse hair; • Recurrent / untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent head lice / scabies/ diarrhoea; • Unmanaged / untreated health / medical conditions including poor dental health; • Frequent accidents or injuries.
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Indicators in the parent:	<ul style="list-style-type: none">● Disinterested or undisturbed by accident or injury;● Aggressive towards child or others;● Unauthorised attempts to administer medication;● Tries to draw the child into their own illness;● Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault;● Parent/guardian may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids;● Observed to be intensely involved with their children, never taking a much needed break nor allowing anyone else to undertake their child's care;● May appear unusually concerned about the results of investigations which may indicate physical illness in the child;● Wider parenting difficulties, may (or may not) be associated with this form of abuse;● Parent/guardian has convictions for violent crimes.
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Appendix 2: Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. Issues are described in detail below in alphabetical order.

If staff have any queries – they should speak to and seek the advice of the DSL.

Child on-child abuse

All staff should be aware that children can abuse other children (previously referred to as peer-on-peer abuse). This is abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual harassment,¹⁰ such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos¹¹ (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child on Child Sexual Violence and Sexual Harassment

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence, the policy is referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?: Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment: Sexual harassment is ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature.

Online sexual harassment: Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

Responding to reports of sexual violence and sexual harassment: Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. The school’s initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

<INSERT CRIMINAL JUSTICE BILL INFO HERE WHEN PASSED

[Link to Gov article](#)
[Link to progress of Bill](#)>

Staff should remember that effective safeguarding practice includes:

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children’s social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential that a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Staff should be aware that the notes of such reports could become part of a statutory assessment by children’s social care and/or part of a criminal investigation;
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.

- if possible, managing reports with two members of staff present, (preferably one of them being the DSL or a deputy). However, this might not always be possible; and
- informing the DSL (or deputy), as soon as practically possible, if the DSL (or deputy) is not involved in the initial report.

Child sexual exploitation (CSE) and child criminal exploitation

These are defined as forms of abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

The imbalance can be due to age, as well as other factors like gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (eg. increased status) of the perpetrator or facilitator. It can:

- be perpetrated by individuals or groups, males or females, and children or adults;
- be a one-off occurrence or be a series of incidents over time, and range from opportunistic to complex organised abuse;
- involve force and/or enticement-based methods of compliance and can involve violence or threats of violence;
- can be exploitative even when the activity appears to be consensual;
- happen online as well as in person.

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. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- 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 school or education or do not take part in education.

If staff suspect that a child is, or is at risk of, sexual exploitation, the DSL should be made aware of concerns as soon as possible.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, 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;
- associate with other young people involved in exploitation;
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

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 forms of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded
- ‘Denial of Service’ (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, staff must speak to the DSL (or a deputy).

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at [Domestic abuse](#).

Female Genital Mutilation (FGM)

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

Whilst all staff should speak to their school's DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Forced marriage

Any form of marriage for someone under 18 is illegal, even where violence, threats or another form of coercion are not used. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufco.gov.uk.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm. If staff have any concerns that a child may be homeless or about to be made homeless they should speak to the DSL.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only trained professionals should make a diagnosis of a mental health problem, but staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

Abuse, neglect, exploitation and other traumatic adverse childhood experiences can have a lasting impact, and it's essential that staff are aware of how these experiences can affect children's mental health, behaviour and education. Staff should take action on any mental health concerns that are also safeguarding concerns, following the school's safeguarding procedures and speaking to the DSL or deputy. DfE has guidance available on preventing and tackling bullying and mental health and behaviour

Modern Slavery and the National Referral Mechanism

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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the statutory guidance document '*Modern slavery: how to identify and support victims*' ([click here](#)).

Preventing radicalisation

Extremism is defined as the promotion or advancement of an ideology (i.e a set of social, political, or religious ideas, beliefs and attitudes that contribute to a person's worldview) based on violence, hatred or intolerance, that aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2).

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect people susceptible to extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Recognising extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes;
- glorifying violence, especially to other faiths or cultures;
- making remarks or comments about being at extremist events or rallies outside school;
- evidence of possessing illegal or extremist literature;
- advocating messages similar to illegal organisations or other extremist groups;
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.);
- secretive behaviour;
- online searches or sharing extremist messages or social profiles;
- intolerance of difference, including faith, culture, gender, race or sexuality;
- graffiti, art work or writing that displays extremist themes;
- attempts to impose extremist views or practices on others;
- verbalising anti-Western or anti-British views;
- advocating violence towards others;

If a member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with their DSL (or deputy).

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations.

Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or involved with serious violent crime. There may include:

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing;
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

So-called ‘honour-based’ abuse

So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to their school’s DSL (or deputy) who liaise with the police and/or children’s social care.

Appendix 3: What schools must include in recruitment policy

The following aspects of safer recruitment should be documented in the safer recruitment policy:

Aspect	Additional guidance, taken from KCSIE 2024
Policy aim/statement:	Commitment to recruit suitable people
Training	Details of training for staff involved in recruitment, including at least one person on an interview panel who has completed safer recruitment training
Advert	<p>Define role including job description and person specification covering</p> <ul style="list-style-type: none"> - the skills, abilities, experience, attitude, and behaviours required for the post; and - the safeguarding requirements - whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020
Application forms	<ul style="list-style-type: none"> - statement advising applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children - how copy of child protection policy and practices and policy on employment of ex-offenders are provided to applicants - the information applicants are required to provide: personal details, current and former names, current address and national insurance number; details of their present (or last) employment and reason for leaving; full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment; qualifications, the awarding body and date of award; details of referees/references; and a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification. <p><i>Note: Schools and colleges should not accept copies of curriculum vitae in place of an application form.</i></p>
Shortlisting	<ul style="list-style-type: none"> - that shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. - that applicants should be asked to sign a declaration confirming the information they have provided is true and the approach where the signature is electronic - the purpose and implications of the self-declaration - how candidates are shortlisted – by at least two people who will consider/look for any inconsistencies, gaps in employment and reasons given for them and all potential concerns. <p>New KCSIE 2022 - due diligence on the shortlisted candidates: This as part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.</p>
Employment history and references	<ul style="list-style-type: none"> - the importance of references in the recruitment process and that information from references will be used to confirm whether they are satisfied with the applicant's suitability to work with children - account is taken of the advice on gaining, checking, verifying and using points listed in that references will be asked of current or last employer, and where possible from the employer where the applicant last worked with children - the source of the reference will be verified, and that the person completing the reference is in a senior role

	<ul style="list-style-type: none"> - information on the application form will be compared with that in the reference and any discrepancies taken up with the candidate - establish the reason for the candidate leaving their current or most recent post <p>make clear that appointments will not be confirmed until all references are in place/ issues resolved.</p>
Selection	<ul style="list-style-type: none"> - how school uses a range of selection techniques to identify the most suitable person for the post - questions will cover candidates suitability and motivation for post and working with children, exploring experiences of working with children, probing any gaps in employment or frequent changes in employment - exploration with candidates to determine their suitability to work with children - students/student involvement in the recruitment process in a meaningful way - observation of short-listed candidates (under appropriate supervision) - that information considered in decision making will be clearly recorded along with decisions made.
Cautions and convictions on DBS	<p>How school manages any disclosures of cautions and convictions on DBS, including data protection related to criminal information as a result of DBS filtering changes November 2020. <u>Also actions if applicant has not declared these, school decision making concerning any disclosures and risk assessment.</u></p> <p><u>Questions that must now be asked and noted in application pack for applicants and recruitment policy</u></p> <ul style="list-style-type: none"> - Do you have any unspent conditional cautions or convictions under the Rehabilitation of Offenders Act 1974? - Do you have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehabilitation of Offenders Act 1974
Risk assessments	<p>Detail of when they should be undertaken eg: further checks decision for those who have lived and worked abroad, issue on DBS, disability, use of volunteers etc.</p>
Definition of regulated activity	<p>if a person</p> <ul style="list-style-type: none"> - will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children; - will be working on a regular basis in a specified establishment, such as a school, for or in connection with the purposes of the establishment, where the work gives opportunity for contact with children; or - engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.
Pre-appointment vetting checks	<p>Checks that must be undertaken when appointing individuals to work in regulated activity. 11-213. Policy must list the following checks:</p> <ul style="list-style-type: none"> - verify a candidate's identity (Note new KCSIE Sept 2021: best practice is checking the name on their birth certificate, where this is available) - obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children - obtain a separate children's barred list check (<i>if an individual will start work in regulated activity with children before the DBS certificate is available</i>) - verify mental and physical fitness to carry out their work responsibilities - verify the person's right to work in the UK, including EU nationals. - if a person has lived or worked outside the UK, make any further checks the school or college consider appropriate - verify professional qualifications, as appropriate to job. <p>In addition check that:</p>

	<ul style="list-style-type: none"> - a person taking up a management position is not subject to a section 128 direction made by the Secretary of State (independent schools, including academies and free schools only) - an applicant employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State imposed by the GTCE, before its abolition in March 2012 - reasonable steps are taken to establish whether an applicant employed carry out teaching work in relation to children, that person is subject to a prohibition order issued by the Secretary of State - appropriate checks are carried out to ensure that individuals employed to work in reception classes, or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations
Online checks	Candidates should be informed that online checks will be undertaken. This should be included on the application form and/or in letters inviting candidates to interview.
DBS checks	(continuous service – moving from a previous post) Statement on school policy on obtaining DBS for applicants who have worked in a school in England, whose last post ended not more than 3 months before appointment, where the person had regular contact with children, were appointed after 12 May 2006 into post which did not include regular contact with children, or they worked in a further education provision that brought them into regular contact with children.
DBS checks (Types of checks)	<ul style="list-style-type: none"> - type of DBS check will be undertaken – basic, standard, enhanced or enhanced with barred list check and for whom, and that DBS will be obtained as soon as practical after appointment - a barred list check must only be undertaken for a person who will engage in regulated activity, if a person commences work ahead of completion of DBS check: the person will be appropriately supervised; all other checks completed and a barred list undertaken the DBS check certificate will be sent to the applicant and that this must be shown to the employer. <p><i>Advice: statement that failure to do so will be considered a disciplinary matter.</i></p> <ul style="list-style-type: none"> - that school will assess cases fairly and in line with their policy on recruitment of ex-offenders policy
DBS update service	<ul style="list-style-type: none"> - Individuals can join the DBS Update Service at the point that an application for a new DBS check is made. - For applicants who subscribe to the Update Service, the school will: <ul style="list-style-type: none"> ▪ obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check ▪ confirm the DBS certificate matches the individual’s identity ▪ examine the original certificate to ensure that it is valid for the children’s workforce (as defined by DfE) ▪ ensure that the level of the check is appropriate to the job they are applying for, e.g. enhanced DBS check/enhanced DBS check including with barred list information.
Recording information- the SCR	<p>Policy statement of school approach to recording on the SCR:</p> <ul style="list-style-type: none"> - must be maintained for all employed staff, agency staff and supply staff (even if work one day) and (independent schools) the proprietor body and (academies & free schools) members of the trustees of the academy trust - this will be kept on paper or electronically - what is recorded on SCR and the date on which each check was completed or certificate obtained. <ul style="list-style-type: none"> ▪ barred list check

	<ul style="list-style-type: none"> ▪ an enhanced DBS check requested/certificate provided ▪ a prohibition from teaching check ▪ further checks on people who have lived or worked outside the UK ▪ a check of professional qualifications, where required; and ▪ a check to establish the person’s right to work in the United Kingdom. <p>- details of an individual will be removed from the SCR once they no longer work in the school</p> <p>- the written confirmation from business supplying the member of supply staff that the business has undertaken the relevant checks and obtained the appropriate certificates</p> <p>- details of any non-statutory information held on the SCR, such as staff training, references, checks on volunteers, checks on governors</p>
Further checks for individuals who have lived or worked outside the UK	<p>This covers all countries including those in the EU/EEA.</p> <p>- Statement that details school approach to obtaining this information through overseas records checks and/or obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked</p> <p>- If the information is not available school will undertake a risk assessment that supports decision making based on available information</p>

Appendix 4 - Self harm and suicide decision making toolkit

Concern	Action	Support to be offered as appropriate to the student
Student presents with superficial cuts/scratches	<ul style="list-style-type: none"> ● Safeguarding team made aware and discuss with the student ● Pastoral support offered, this may include counselling or mentoring ● Parents contacted and advised to take their child to the GP 	<p>WeStrive mentor</p> <p>Mental Health First Aider</p> <p>School counsellor</p>
Student presents with cuts	<ul style="list-style-type: none"> ● Safeguarding team made aware and discuss with the student ● Pastoral support offered ● Parents contacted and advised to take their child to the GP ● School to make a CAMHS referral ● Individual risk assessment composed for the student and shared with relevant members of staff, student and parent 	<p>Pastoral and Assistant Pastoral Directors</p> <p>External links shared:</p> <p>Kooth</p> <p>Young Minds</p> <p>Samaritans</p> <p>Childline</p> <p>Wellbeing apps</p> <p>Links counselling.</p>
Student discloses that they have suicidal thoughts	<ul style="list-style-type: none"> ● Safeguarding team made aware and discuss with the student ● Pastoral support offered ● Parents contacted and advised to take their child to A and E ● Individual risk assessment composed for the student and shared with relevant members of staff, student and parent 	<p>Where appropriate advice will be sought from the school nurse, safeguarding borough lead and MASH team</p>
Student discloses that they have attempted suicide out of school hours	<ul style="list-style-type: none"> ● Safeguarding team made aware and discuss with the student ● Pastoral support offered ● Parents are contacted and individual discussion takes place to ascertain what has happened and medical intervention. ● Individual risk assessment composed for the student and shared with relevant members of staff, student, parent 	
Student self harms/attempts suicide in school	<ul style="list-style-type: none"> ● Ambulance to be called ● Parents contacted to accompany their child in the ambulance. If parents are not available a member of the pastoral team to accompany. ● Follow up risk assessments and support organised as appropriate to the student 	
The School is notified by an external agency that a student has attempted suicide / self harmed	<ul style="list-style-type: none"> ● Safeguarding team made aware and discuss with the external agency regarding support required. ● Individual risk assessment composed for the student and shared with relevant members of staff, student and parent as appropriate 	