

SAFEGUARDING & CHILD PROTECTION POLICY

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POLICY LEAD	Simon Atkinson – National Safeguarding Advisor	
POLICY AUTHOR (if different from above)		

POLICY CONTEXT

- This Safeguarding and Child Protection Policy sets out the campus's commitment to Safeguarding, Promoting the Welfare of Children and Keeping Children Safe in Education.
- At Focus School Swaffham Campus (hereafter 'the Campus'), we will provide a safe and welcoming environment where every child and young person is respected and valued. It is the responsibility of everyone to be alert to the signs of abuse and neglect in all its forms and to follow the procedures in place to ensure that children receive timely and effective support, protection and justice.
- The purpose of this policy is to be clear about how we safeguard and promote students' welfare in accordance with our moral duty and statutory guidance.

POLICY REQUIREMENT (see Section 2)

- This Policy applies to all staff, trustees, volunteers, visitors and parents of both current and prospective students in the Campus. The campus will localise this policy to ensure it is consistent with the practice of both the Local Safeguarding Children Board and Local Authority.
- The requirements of this policy are to:
 1. Make certain that the schools responsibility to safeguard and promote the welfare of children is of paramount importance
 2. Protect children and others from maltreatment or harm – in all its forms - and keep children safe
 3. Be clear that all our staff and volunteers have a role to play in monitoring, recording and reporting of concerns and cases
 4. Demonstrate the links to the wider vulnerability landscape and the importance of background/context in addressing issues
 5. Identify strategies and early help interventions available to support children at risk
 6. Ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay
 7. Ensure that safe recruitment procedures are implemented
 8. Comply with locally agreed inter-agency procedures and National Guidance

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1 INTRODUCTION

1.1 Rationale

1.1.1 This states why the policy is necessary and include reference to any relevant guidelines,

1.1.2 This Safeguarding and Child Protection Policy sets out the campus's commitment to Safeguarding and Promoting the Welfare of Children and Keeping Children Safe in Education. This policy is one of a series of associated policies in place within the campus.

1.1.3 At the Campus we recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect, in all of its forms. We follow stringent procedures to ensure that children receive effective education, support, protection and justice.

Statutory Guidance

1.1.4 The **Teacher Standards 2012** state that teachers, including Head Teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

1.1.5 The DfE Guidance, **Keeping Children Safe in Education 2018**, sets out the legal duties and procedures which will be implemented at the Campus. This includes procedures related to Regulated Activity, pre-employment checks including DBS checks, volunteers and allegations against staff.

1.1.6 **Keeping Children Safe in Education, September 2018** guidance is applied at the Campus alongside **Working Together to Safeguard Children, A Guide to Inter-agency Working 2018** which emphasises that effective safeguarding systems are those where:

- The **child's needs are paramount**, and the needs and wishes of each child should be put first, so that every child receives the support they need before a problem escalates
- **All professionals who come into contact with children and families** are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to children
- **All professionals share appropriate information in a timely way** and can discuss any concerns about an individual child with colleagues and local authority children's social care
- **High quality professionals are able to use their expert judgement** to put the child's needs at the heart of the safeguarding system so that the right solution can be found for each individual child
- **All professionals contribute to whatever actions are needed** to safeguard and promote a child's welfare and **take part in regularly reviewing the outcomes** for the child against specific plans and outcomes
- **Local areas innovate** and changes are informed by evidence and examination of the data, serious case reviews and thematic case reviews.

1.1.7 This policy and procedures aims to outline the role that the Campus will have, the procedures that staff should take and guidance on issues related to child protection generally. It is not exhaustive. All staff should consider sensitively the needs and safety of the child as being at the centre of any decision they make. The views and voice of the child are particularly important in quality safeguarding practice.

1.1.8 In most cases this will be a referral of concerns to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. For all concerns about adults who work with our students, the Head Teacher should be informed immediately. Schools are often a window into the lives of children and there is a moral and statutory duty to be professionally inquisitive if a member of staff has a concern. This would include challenging other professionals if the staff member is not satisfied that the matter has been dealt with appropriately.

1.2 Scope

1.2.1 This policy and the associated statutory procedures apply to all staff, trustees, volunteers, visitors and parents of both current and prospective students in the Campus.

1.2.2 The policy and procedures are consistent with those of the Local Safeguarding Children Board.

1.2.3 The policy is available on the school website and is made available to all staff, trustees, volunteers, parents both current and prospective and visitors to the school as appropriate.

1.3 Principles

1.3.1 The Campus/Trust positively supports individuals with learning development needs and ensures that no student is prevented from accessing a broad and balanced curriculum. Staff will work collaboratively with colleagues from learning development services and other organisations, in order to ensure that students have a positive and progressive educational experience

1.3.2 At the Campus, we never believe 'it won't happen here'. To properly safeguard all of our children and young people, we will always consider the unthinkable and we will report every concern including a 'nagging doubt'.

1.3.3 Our organisational culture will be one of **highly consistent and collective vigilance** for the safety and wellbeing of the children in our care, for every child every day. Our collective threshold for reporting concerns of all types – be it related to behaviour of adults or concerns about children and families – needs to be low. Even nagging doubts may build into a pattern of information which is concerning. We all have a duty to bring forward concerns confidentially and in line with the policy. That confidentiality applies to our children and their families and only those that require a legitimate need to know the specifics of an operational safeguarding matter should be informed. Whilst support and early help are recognised as a community strength informed consent must be addressed with parents before any day to day safeguarding matters are shared with Trustees. The Trustee role is ordinarily a strategic one of governance and compliance.

1.3.4 At the Campus we will provide a safe environment for students both under and over 18 especially those who are considered vulnerable.

1.3.5 We will provide all staff with the necessary information to enable them to meet their child protection responsibilities, ensure consistent good practice and demonstrate our commitment with regard to Child Protection to students, parents and other partners.

2 POLICY

2.1 Safeguarding is everyone's responsibility and effective safeguarding arrangements at the Campus will be underpinned by three key principles:

- **A child-centred approach.** The **welfare and needs of children are paramount** in all circumstances.

- **Everyone** employed and who comes into contact with children at the Campus has a responsibility in relation to safeguarding and to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- **Communication** about child protection and safeguarding issues will be timely, clear and will follow statutory guidance from Norfolk County Council's LSCB. Information sharing will ensure communication with all stakeholders has been considered. Decisions about information sharing will be made carefully, checked with external children's services agencies and recorded.

2.2 The Campus acknowledges that some children, including disabled children and those with Special Educational Needs, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

2.3 As part of our safeguarding policy the Campus will:

- Promote and prioritise the safety and wellbeing of children and young people
- Provide a safe environment for students both under and over 18 especially those who are considered vulnerable.
- Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse in all its forms, neglect and other safeguarding concerns relating to children and young people
- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- Prevent the employment/deployment of unsuitable individuals
- Ensure robust safeguarding arrangements and procedures are in operation.

2.4 The policy and procedures will be widely promoted and are mandatory for everyone involved in the Campus. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

Monitoring

2.5 The monitoring of campus safeguarding practice will be a combined exercise between Trustees, the Headteacher, Designated Safeguarding Lead and the National Support Office. We will operate a cycle of continuous improvement to put children at the heart of all we do. Fundamentally this will comprise of;

- Regular meetings between the Safeguarding Trustee and DSL
- The annual completion of a comprehensive LSCB audit/assessment with improvements featuring on the School Improvement Plan (SIP)
- The completion of the FLT half-termly safeguarding assessment/performance data with improvements featuring in the SIP
- An annual review of the campus Child Protection policy
- Support and discussion with the FLT National Safeguarding Advisor
- Review by the FLT National Safeguarding Committee

2.6 More detail in relation to the process of governance is in Appendix 1 (FLT Governance Guidance document 2018)

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Roles & Responsibilities (full details in Section 4 - responsibilities)

3.1 The Board of Trustees

- 3.1.1** Keeping Children Safe in Education 2018 - Part 2 - The Management of Safeguarding – provides guidance for the Board of Trustees on their responsibility as the proprietor to ensure policy, practice and training is in place. The Board of Trustees will appoint a Safeguarding Trustee to oversee this.
- 3.1.2** The Board of Trustees and proprietorial body must safeguard and promote the welfare of children (everyone under the age of 18) to protect them from maltreatment, to prevent impairment of children’s health or development ensuring that children grow in circumstances consistent with the provision of safe and effective care and taking action to enable children to have the best outcomes. They must ensure that policy, practice and training is in place. This is a strategic role and trustees would not ordinarily be involved in the day to day response to operational safeguarding matters.
- 3.1.3** The Board of Trustees will ensure that there is a mechanism in place to assist all staff, including trustees and volunteers understand and discharge their role and responsibilities to safeguarding in line with the Keeping Children Safe in Education (Part 1) 2018.
- 3.1.4** All trustees, Headteachers, members of the Senior Leadership Team and Departmental Heads will be subject to enhanced DBS and S128 management checks. The process is outlined in the Governance and Compliance Section of the Safeguarding Office on Canvas.

The Safeguarding Trustee is: **Russell Evershed**

The HR Trustee who has been delegated the responsibility for Safer Recruitment is: **Dane Lawrence**

The Head Teacher is: **Janet Marsh / Mark Clayton (Co-Acting Heads)**

The Designated Safeguarding Lead is: **Michelle Boyton**

Deputy DSL’s are: **William Dashley and Mark Clayton**

3.2 The Designated Safeguarding Lead (DSL) and any deputy

- 3.2.1** The DSL will:
- Be a senior member of the campus staff on the leadership team. The Headteacher should not be the lead DSL but may perform a deputy role.
 - have Designated Safeguarding Lead role defined as an appendix to their job description
 - Be **trained as a Designated Safeguarding Lead** by a Local Authority. It would be preferable to do this with the LA from which the campus has the greatest catchment. *This campus uses Norfolk County Council to deliver training for the DSL and deputies.*
 - be registered for child protection and safeguarding updates from the local authority in each student locality
 - understand referral procedures for the local authority in each student locality
- 3.2.2** The Deputy Designated Safeguarding Lead will:
- Be a member of the campus staff (Teaching or Support staff). This may also be the Head Teacher
 - have Deputy Designated Safeguarding role defined as an appendix in their job description
 - act in the absence of the Designated Safeguarding Lead
 - be trained as a Designated Safeguarding Lead by a Local Authority

- be registered for child protection and safeguarding updates from the local authority in each student locality
- understand referral procedures for the local authority in each student locality

3.2.3 There should always aim to be a member of staff of each sex on the DSL team.

3.3 The National Safeguarding Advisor

3.3.1 There is a National Safeguarding Advisor at Focus Learning Trust who is able to advise on the implementation of the policy and procedures, training and auditing of effectiveness. This does not, in any way, replace guidance provided by the LSCB, LADO or Children's Social Care regarding specific referrals. Advice regarding referrals must be directly sought from the LSCB, LADO and Children's Social Care in line with local arrangements. It is the campus DSL who has the statutory responsibility and not national office but the National Safeguarding Advisor is available to discuss issues/options particularly in more challenging and complex matters.

The National Safeguarding Advisor is: Simon Atkinson

3.4 National Safeguarding Committee

3.4.1 Focus Learning Trust have a National Safeguarding Committee, with representation from Head Teachers, a practicing DSL, National Leadership Team members and the National Safeguarding Advisor. This group will review national trends in Child Protection, in order to advise on improvements to Child Protection policy and procedure across Focus Learning Trust Campuses. The National Safeguarding advisor will also work with the Head Teacher and Trustees to manage critical incidents at the campus, once referred to the appropriate authorities.

3.5 Regional Principal

3.5.1 The Regional Principal has delegated professional line management for the Head Teacher (refer to section 4). As such, the Regional Principal will regularly audit safeguarding procedures at the Campus and will make recommendations, where necessary, for improvement or sharing of good practice. The Regional Principal will have received national DSL Training. The Regional Principal, unless acting as Head Teacher, will not be expected to advise on specific referrals to the LADO, Children's Social Care or Police as this would delay the process and would conflict with this policy.

The Regional Principal is: Matthew Phillips

3.6 Safeguarding Training

3.6.1 The Safeguarding Trustee and Designated Safeguarding Lead will be responsible for ensuring all staff, trustees and volunteers who work with children undertake the appropriate training. They will also ensure that a campus Training Log is maintained recording all training/awareness for all staff including new appointments. This includes retaining evidence of the additional training, emails, staff meetings and the sharing of publications to increase knowledge and skills relating to safeguarding.

3.6.2 Where the campus is on two sites or in different locations or the Designated Safeguarding Lead is not on site full time, then another member of staff will be required to undergo LSCB Child Protection Training, at Designated Safeguarding Leader (DSL) level.

3.6.3 The DSL, Deputy DSL and Safeguarding Trustee in addition to their formal training with the LSCB requirements (every 2 years) must ensure that their knowledge and skills are

up-dated by way of the Focus Learning Trust updates, LSCB updates and DfE updates to guidance. This information should also be shared with all staff by way of emails, e-bulletins, notice boards and staff meetings.

3.6.4 Children are taught to keep themselves safe including on-line through teaching and learning opportunities as part of the curriculum.

3.6.5 The strategic approach to training for Focus Learning Trust is contained within a training strategy. It details the approach to training, the requirements relative to role and frequency. That document is part of the approach to governance and compliance and available at Appendix 2. At the campus we will operate a structured approach to training within this strategic framework.

3.7 Good Practice Guidelines and Staff Code of Conduct

3.7.1 The Teacher Standards 2012 state that teachers, including Head Teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their duties.

3.7.2 Good Practice includes:

- treating all children with respect
- setting a good example by conducting themselves appropriately
- involving students in decisions that affect them
- encouraging positive, respectful and safe behaviour among students
- being a good listener
- being alert to changes in students' behaviour and to signs of abuse and neglect
- recognising that challenging behaviour may be an indicator of abuse
- understanding the Safeguarding & Child Protection Policy and other guidance documents on wider safeguarding issues, for example Anti-Bullying, Behaviour, ICT, Camera and Using Images and Mobile Telephone procedures
- asking the student's permission before initiating physical contact, such as assisting with physical support during PE or administering first aid
- maintaining appropriate standards of conversation and interaction with and between students
- applying the use of reasonable force only as a last resort and in compliance with the campus procedures
- referring all concerns about a student's safety and welfare to the DSL and knowing when, if necessary, to direct to police or children's social care
- Following the campus's rules with regard to communication with students and use of on-line networking (Refer to the Social Media Policy).

3.7.3 The school Safeguarding Code of Conduct for our staff is at Appendix 3

3.8 Keeping Children Safe in Education 2018

3.8.1 Part 1 Safeguarding Information for all staff – The Keeping Children Safe in Education Guidance must be read, understood and will be used by the campus to assist in establishing a highly effective safeguarding and child protection culture.

3.8.2 All staff, including volunteers, and Trustees will undertake the KCSIE Quiz, which will be signed, dated and recorded along with a statement that they have read and understood the KCSIE 2018 guidance

3.8.3 A copy of the KCSIE (Part 1 – is the minimum for Volunteers) will be provided to all staff at the start of the Autumn Term or upon their appointment in-year. This will form part of the training for Safeguarding and Child Protection.

3.8.4 It will also be included as part of the induction process for all new staff, trustees and volunteers. This will assist all staff in understanding and discharging their role and responsibilities towards safeguarding.

Helping Children to Keep Themselves Safe including on-line

3.8.5 The Byron Review (2008) has classified the main areas of risks as:

- Content - exposure to inappropriate or harmful content
- Contact - being subjected to harmful online interaction with other users
- Conduct - personal online behaviour that increases the likelihood of, or causes, harm

3.8.6 We will never achieve risk-aware young people who can keep themselves safe, by blocking content. Children at the Campus are taught to recognise, self-reflect and manage risk through Personal, Social, Health and Economic (PSHE) education lessons and rehearsed throughout all aspects of campus life. The campus approach is designed to help children to think about risks they may encounter and, with staff, work out how to self-manage to reduce those risks. This should include:

- discussion about risk, promoting sensible behaviour
- teaching children how to conduct themselves and how to behave in a responsible manner
- reminding children about e-safety, mobile devices and tackling bullying procedures

3.8.7 The campus promotes an ethos of respect for children and students and they must be aware of who to speak to in confidence about any worries they may have, including electronic reporting with the e-safety button.

3.9 Partnership with Parents

3.9.1 It is important that the campus has an established approach to working with parents – for parents' training and for liaison in the event of a child protection concern. Key to this is the cultural tone set by the Headteacher and trustees in terms of what good safeguarding practice looks like and what can be expected. Parents' and children's need for privacy should be respected and such a position is supported by the Data Protection Act (GDPR) 2018. However, the priority is the needs of the child and effective liaison is crucial unless such action would put a child or vulnerable adult at risk of harm.

3.9.2 It should be recognised that families from different backgrounds and cultures will have different approaches to child-development. These differences should be acknowledged and respected provided they do not place the child at risk.

3.10 Parent Access to Educational Records

3.10.1 Other than in exceptional circumstances, campuses must make available for inspection or provide a copy of a student's 'educational record' if requested to do so in writing by a parent or student. This must be supplied within 30 days of a request.

3.10.2 Meaning of Educational Record – any information processed relating to the student or former student of the campus which originated from or was supplied by any member of staff, the student themselves or a parent of that student. The Educational Record must not disclose any information which you would be prohibited from sharing with the student

themselves under the GDPR 2018 or which that the student would have no right to access themselves such as consider third party information.

3.10.3 In some circumstances access can be refused, for example, providing information about social services or related activities, if disclosure may cause serious harm to the physical or mental health of the student, releasing information that would be likely to prejudice an ongoing criminal investigation or confidential communications between client and professional legal adviser.

3.11 Private Fostering

3.11.1 Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or close relative.

3.11.2 Close relatives are defined by Section 105 Children Act 1989 as a *grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent*

3.11.3 To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous. That continuity will not be disrupted by occasional short breaks

3.11.4 Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

3.11.5 Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

3.11.6 School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

3.11.7 On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered, to record this on SIMS and to update records with all changes.

3.12 Recognising Abuse

3.12.1 Abuse may fall into the categories of physical, emotional (including regular exposure to domestic violence), sexual and neglect.

3.12.2 All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. You must seek to understand the background and context to make good safeguarding decisions.

3.12.3 Child abuse is a term used to describe ways in which children are harmed by someone, often in a position of power. It is not the responsibility of campus staff to decide whether child abuse is occurring but we are required to act on any concerns, including nagging doubts and report it to the appropriate party. The health, well-being and protection of a child are paramount.

3.12.4 Abuse might fall into the categories of:

- physical

- emotional (including regular exposure to domestic violence)
- sexual
- neglect.

3.12.5 How to recognise and respond to all forms of abuse is detailed in the FLT guide “How to - recognise and respond to child abuse and safeguarding matters” at Appendix 4

3.13 Peer on Peer Abuse

3.13.1 The Campus has put in place safeguards to reduce the likelihood of peer on peer allegations. There is an established ethos of moral integrity, respect, friendship, courtesy and kindness with a clear Behaviour Policy and visible staff presence. We seek to educate all pupils on healthy relationships through the curriculum. We recognise despite this we need to be alert to peer on peer abuse.

3.13.2 As a campus we recognise that peer on peer abuse is most likely to manifest itself as;

- Bullying (including cyberbullying)
- Physical abuse
- Sexual violence and harassment
- Sexting (youth produced sexual imagery)
- Initiation violence and rituals

3.13.3 Any peer on peer allegation must be referred to the DSL using CPOMS to record what has happened and any action taken. Where a concern regarding peer on peer abuse has been disclosed to the DSL advice and guidance may be sought from Children’s Social Care. Where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted. If a pupil’s behaviour negatively impacts on the safety and well-being of other pupils then safeguards will be put in place to promote the welfare of the pupils affected.

3.13.4 In relation to understanding exactly what has happened and why this school recognises the influences of peers and family beyond the “school gate”. The contextual aspect is very important in determining the best action.

3.13.5 PoP abuse in any form will be taken seriously and we will put the safety and health and well-being of the child at the forefront of any action taken. It will not be simply seen as banter.

3.13.6 As a school we recognise the research that suggests PoP abuse is invariably gender based, that males tend to be “the abuser” and that the concept is one of power and not consent.

3.13.7 In all circumstances, the victim and perpetrator will be provided with support to prevent any reoccurrence of improper behaviour and sanctions will be applied in line with the behaviour policy. We will seek to open up choices and involve our pupils in solutions

3.13.8 More detail is contained in the specific Peer on Peer Abuse policy and the responding to abuse practitioners “How to Guide” at Appendix 4.

3.14 Children with sexually harmful behaviour

3.14.1 Research suggests that up to 40 per cent of child sexual abuse is committed by someone under the age of 18.

3.14.2 The management of children and young people with sexually harmful behaviour is complex and the school will work with other agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and

perpetrator. Staff who become concerned about a pupil's sexual behaviour should speak to the DSL as soon as possible.

3.15 Youth Produced Sexual Imagery (Sexting)

3.15.1 In August 2016 the UK Council for Child Internet Safety (UKCCIS) published non-statutory guidance on managing incidents of sexting by under-18s. The UKCCIS guidance is non-statutory, but should be read alongside KCSIE 2018. It should be followed unless there's a good reason not to do so.

3.15.2 There is no clear definition of 'sexting'. Instead, our policy refers to 'youth-produced sexual imagery'. This is imagery that is being created by under 18s themselves and involves still photographs, video, and streaming. In the guidance, this content is described as sexual and not indecent. Indecent is subjective and has no specific definition in UK law.

3.15.3 Incidents covered as Youth Produced Sexual Imagery:

- **Person under 18** creates a sexual image of themselves and shares it with another person under 18
- **A person under 18** shares an image of another under 18 with another person under 18 or an adult
- **A person under 18** is in possession of sexual imagery created by another person under 18.

3.15.4 Incidents not covered by the guidance:

- Under 18s sharing adult pornography
- Under 18s sharing sexual texts without sexual imagery
- Adults sharing sexual imagery of under 18s. **(This is child sexual abuse and must always be reported to police.)**

3.15.5 Our response should be guided by the 'principle of proportionality' (see glossary)

3.15.6 'The primary concern at all times should be the welfare and protection of the young people involved.' Sexting in schools and colleges: responding to incidents and safeguarding young people. UKCCIS 2016.

3.15.7 How to recognise and respond to all forms of abuse is detailed in the FLT guide "How to - recognise and respond to child abuse and safeguarding matters" at Appendix 4.

The Law

3.15.8 Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18.

3.15.9 Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear

3.15.10 These laws weren't created to criminalise young people but to protect them.

3.16 Female Genital Mutilation

- 3.16.1** The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.
- 3.16.2** Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.
- 3.16.3** At risk or suspected cases should follow standard safeguarding arrangements.

3.17 Safeguarding Students on Work Experience

- 3.17.1** The safeguarding of a student on long-term placements for vocational training or work experience should be considered and appropriately risk assessed.
- 3.17.2** Where students on work placements are supervised by someone who is themselves unsupervised, the campus must obtain an enhanced DBS check for that supervisor before the placement begins.
- 3.17.3** Where the student is under 16 years of age, the campus must also obtain a barred list check for that supervisor. Campuses cannot obtain a barred list check where the student is aged 16 or 17.

3.18 Extended School and off-site-arrangements

- 3.18.1** If other organisations provide services or activities on the site, the campus must check that they have appropriate procedures in place, including compliance with safer recruitment procedures. The school should check the appropriateness of any visitor to the school (e.g. by open source internet searches).
- 3.18.2** When students attend off-site activities, including day and residential visits and work-related activities, the campus will check that effective child protection arrangements are in place. In the case of such alternative provision the campus should obtain written confirmation that the appropriate safeguarding checks have been conducted.

3.19 Allegations of abuse made against teachers and other staff

- 3.19.1** Anyone may make an allegation against a member of staff, volunteer or Head Teacher.
- 3.19.2** The Head teacher is ordinarily responsible for receiving, managing and collating concerns about adults at the school. All such allegations should be brought to their attention. If the concern is about the Head teacher then the Safeguarding Trustee should be informed.
- 3.19.3** The Local Authority Designated Officer (LADO) should be informed immediately of any disclosure about a staff member or adult working with the school in any capacity if it is apparent that they have;
- behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child; or
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- 3.19.4** In making any determination to discuss with the LADO it is very important that all the background and context is collated and understood. Issues such as previous similar allegations, corroborative information etc is all relevant to the decision making.
- 3.19.5** A record will be made of any decision not to refer, with clear rationale as to why not. If there is any doubt then the expectation is that a discussion with the LADO will occur.

3.19.6 This campus also recognises that our staff can on occasion go through difficult periods in their own lives. This may result in suggestions of domestic abuse, excessive use of alcohol, allegations of assault etc away from campus life. If and when this becomes known to the school the same approach to considering any risk that the individual may pose to our children will be considered and if appropriate referred to the LADO.

3.19.7 If a criminal offence has been committed, the police and the LADO will be contacted.

3.19.8 The specific detail in responding and managing such allegations is in Section 4 of KCSIE 2018 and this will be adopted and followed by this campus. This includes suspension and the action following false or malicious allegations.

3.19.9 If there is a suggestion that a child has suffered or likely to have suffered significant harm then the campus will support and contribute to any strategy discussion led on by Children's Social Care.

3.20 Low level concerns about adults in school

3.20.1 Low level concerns, that may not reach the threshold for reporting, should be referred to the Head Teacher. Such 'low-level' reporting will enable patterns of inappropriate behaviour to be detected as early as possible and for appropriate and proportionate action to be taken swiftly in response.

3.20.2 Where a concern does not meet the LADO's threshold, the school should take appropriate and proportionate action. This may include investigating the matter and clearly explaining to the adult who is the subject of the concern

- why their behaviour is inappropriate
- exactly what they should do going forwards to ensure that they correct their behaviour
- the consequences if they don't (e.g. disciplinary action/referrals to LADO)
- closely monitoring the situation to ensure that the member of staff is in fact correcting their behaviour.

3.20.3 A record of the action taken should be placed on the staff's confidential and secure personnel file so that any concerning patterns of behaviour can be spotted if there is a reoccurrence in the future. Those that do not reach the threshold for LADO referral in isolation will not be documented in any future reference request.

3.21 Visitors to school

3.21.1 The School will ensure that it complies with the Prevent Duty which requires schools to verify the suitability of all visiting speakers (e.g. internet searches). Schools do not have the power to request DBS checks and barred list checks for visitors, and KCSIE requires Head Teachers and principals to use their professional judgment about the need to escort or supervise visitors.

3.22 Information sharing

3.22.1 Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. The principles of The Data Protection Act (GDPR) 2018 do not change this. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns.

3.22.2 The decisions about how much information to share, with whom and when will ensure that an individual receives the right services at the right time. At the other end of the spectrum it could be the difference between life and death. Poor or non-existent information sharing is a factor repeatedly flagged up as an issue in Serious Case Reviews carried out following the death of, or serious injury to, a child. No staff member

will assume that someone else will pass on information which may be critical to keeping a child safe. A DSL will always confirm referral of a concern. If not, ask again.

- 3.22.3** Professor Munro's review of child protection concluded the need to move towards a child protection system with less central prescription and interference, where we place greater trust in, and responsibility on, skilled practitioners at the frontline. Those skilled practitioners are in the best position to **use their professional judgement about when to share information with colleagues working within the same organisation**, as well as with those working within other organisations, in order to provide effective early help and to keep children safe from harm.
- 3.22.4** Following a referral, the decisions about how much information to share, with whom and when will be made. The DSL will always weigh up what might happen if the information is shared against the consequences of not sharing the information. Early sharing of information is key to providing effective early help where there are emerging problems. At the other end of the continuum, sharing information can be essential to put in place effective child protection services from a range of stakeholders.
- 3.22.5** Decisions about information sharing should be recorded using CPOMS
- 3.22.6** For more information on sharing information which includes a myth-busting guide see Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018).
- 3.23 Children absconding or going missing from an educational setting**
 - 3.23.1** Should a child abscond or go missing it is a potential for abuse and neglect and the campus has a procedure in place detailed in the Attendance Policy to ensure the safeguarding of a child going missing, particularly on repeat occasions. The Head Teacher will log incidents, contact parents and / or other agencies as appropriate and in line with the Attendance Policy. This may be delegated to the DSL. It is important to establish the background and context as to why a child has gone missing.
 - 3.23.2** The Campus will inform the LA if a child is missing for 10 consecutive days or more without permission.
 - 3.23.3** Additional information is available in Annex A of KCSIE 2018 and the DfE Guidance Children Missing Education 2016 which details the process for reporting.
- 3.24 Removal of a Student from Roll**
 - 3.24.1** The Campus will notify the Local Authority for the area in which the child resides when they are about to remove a student's name from the campus admission register. Full details of the student will be provided to the LA when removing a student from roll and all reasonable enquiries will be made to establish the whereabouts of the child jointly with the LA.
- 3.25 Adding a student to Roll**
 - 3.25.1** The LA for the child's locality will be informed within 5 days when adding a student to the admission roll at a non-standard transition point. Full details of the student will be provided to the LA.
 - 3.25.2** A non-standard transfer includes transfer in to our school at year 3, as this is not a usual transition point in mainstream education.
 - 3.25.3** This Guidance will also form part of the Admissions Policy.

The LA's in the Swaffham Campus catchment area are: Norfolk County Council – Children's Services; and Suffolk County Council.

3.26 Making a Referral

- 3.26.1** When deciding whether to make a referral following an allegation or suspicion or abuse the Designated Safeguarding Lead should ensure they understand all the background and context to the allegation. What happened, when, who was present, what was said as well as a professional opinion and the action taken are incredibly important. If there is any doubt as to the threshold for referral then this campus will adopt a position of discussion with the Local Authority. The action required in recognising and responding to abuse are detailed in the “How to Guide” in Appendix 4.
- 3.26.2** It is also very important that as professionals we recognise that if we are not content with the response from the Local Authority then we will potentially challenge the outcome utilising the local escalation process.
- 3.26.3** Our staff should follow up any referral with the Local Authority in which we do not have an established outcome.
- 3.26.4** How to recognise and respond to all forms of abuse is detailed in the FLT guide “How to - recognise and respond to child abuse and safeguarding matters” at Appendix 4.
- 3.26.5** Concerns about children should be made to Children’s Social Care for the area in which the child lives.
- 3.26.6** Any concerns about staff members should be referred to the Local Authority Designated Officer from the area the campus is based.
- 3.26.7** The initial sharing of information may lead to:
- a decision not to take any further action
 - a strategy discussion
 - the involvement of the police or social care services
- 3.26.8** This may be done tentatively and without giving names in the first instance. What appears minor at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus the campus should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse. **That said it is important to ask open questions in order to gain a reasonable understanding of all the circumstances. It is also very important to record exactly what was asked and what was said in response. This will be recorded on CPOMS.**
- 3.26.9** This campus supports and adopts Working Together to Safeguard Children (July 2018) - Appendix 5
- 3.26.10** Outcomes should be communicated to the initial referrer in broad terms if they are a member of staff so that they can be sure they have addressed their statutory responsibility. For others raising concerns that do not have that professional responsibility then confirmation that the matter has been addressed would ordinarily be sufficient. We must be clear the matter has been taken seriously and addressed appropriately.

3.27 Whistleblowing

- 3.27.1** In line with the latest Keeping Children Safe in Education Guidance all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school’s safeguarding practices and know that such concerns will be taken seriously by the Senior Leadership Team.
- 3.27.2** Where a member of staff feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed they should reference the schools

Whistleblowing Policy; this document includes general guidance and advice on Whistleblowing and details of the NSPCC Whistleblowing helpline.

3.27.3 The NSPCC Whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285. The line is available from 8am to 8pm, Monday to Friday or e-mail: help@nspcc.org.uk

3.28 Dealing with the Media

3.28.1 When an allegation is made, the campus will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 at s141F introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a student from the same campus (where that identification would identify the teacher as the subject of the allegation).

3.28.2 The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

3.28.3 The legislation imposing restrictions makes clear that publication of material leading to the identification of the teacher who is the subject of the allegations is prohibited.

3.28.4 In most cases the LADO at the local authority, Police and Children's Social Care Services will have agreed:

- who needs to know and exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any, information can be reasonably given to the wider community to reduce speculation
- how to manage press interest if and when it should arise.

3.28.5 Allegations that are found to have been malicious should be removed from personnel records and any that are not substantiated as malicious should not be referred to in employer references.

3.28.6 FLT has a national Communications Strategy. This details how the organisation will respond to serious reputational allegations and the principles of that response. It is at Appendix 6.

3.29 Transferring Files

3.29.1 The DSL is responsible for ensuring that the Child Protection Files are transferred to each school that a child moves to (e.g. primary to secondary) and the transfer must be conducted securely. It is good practice to request a receipt from the accepting school. The DSL will carefully consider what is transferred but it is important to give the receiving school a good understanding of any issues, a clear narrative and action taken. It may well be appropriate for the current DSL to make contact with the receiving school to assist with understanding. If a child has siblings that are staying in the same campus it is important to keep a copy of that child's file to retain context/background.

3.29.2 The Designated Safeguarding Lead will:

- ensure transfer of Child Protection Files to the new school without delay; within 5 days. Ask for confirmation of receipt from the receiving school
- send separately from the student's general school file

3.30 Record Keeping

- 3.30.1** Child Protection records should be retained by the last school attended. The long term security of relevant safeguarding documents and related correspondence is crucial should allegations of abuse arise. All such documents must be securely retained from the date of birth of the student plus 50 years. For further information please refer to the Retention of Records policy.
- 3.30.2** Additionally, storage provisions for all such documents must be arranged in the event of the School / Education Trust ceasing operations. Storage in these circumstances would be at the office of a solicitor, accountant or at a professional secure storage company.
- 3.30.3** The following information should be retained for a minimum of 50 years:
- A copy of Safeguarding Policies and revisions thereof
 - Records of safeguarding training
 - Records of abuse allegations or incidents including notification to the appropriate authorities
 - Copies of relevant information and accompanying correspondence relating to abuse of students whilst in your care
 - Copies of your historical public liability insurance policies

3.31 Data Sharing

- 3.31.1** Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Information sharing with other agencies is vital in identifying and tackling all forms of abuse.
- 3.31.2** Where children are on a child protection plan (previously referred to as the Child Protection Register) and leave one school for another, the Designated Safeguarding Lead must inform the receiving school. If the child leaves the school with no receiving school, details should be passed to the local authority principal education social worker.
- 3.31.3** Staff have a professional responsibility to share relevant information about the protection of children with the investigative agencies. Members of staff should not promise confidentiality but can let the child know that only those who need to know will be informed and always for the child's own sake.
- 3.31.4** Time should be taken to reassure the child and confirm that information given will be treated sensitively. Reassurance should be given and the adult involved must listen sympathetically and non-judgmentally.
- 3.31.5** Staff should be careful in subsequent discussions and ensure that information is only given to the appropriate person. All staff should be kept aware of issues relating to confidentiality and the status of information they may hold.
- 3.31.6** Members of staff, other than the DSL, should only have enough details in order to help them to act sensitively and appropriately to a student. This should be based on a necessity to know and be justifiable at a later date if required within that context. Private sensitive information regarding pastoral issues must be kept confidential and secure. Discretion should be used when talking about the personal and changing circumstances of children, e.g. when a child goes into care.

3.32 Supporting Children at Risk

- 3.32.1** For children at risk, school may be the one stable place from which they can expect security and reassurance. It is not only about being alert to potential abuse but providing the support to help children through difficult times, providing those with the coping skills

that can help avoid situations arising and dealing with the emotional difficulties afterwards if they do.

3.33 Early Help

- 3.33.1** This campus will be prepared to identify children who may benefit from early help. This means providing support as soon as a problem emerges at any point in a child's life.
- 3.33.2** All staff should understand their role in early help and support the assessment process. Staff are encouraged to discuss any early help requirements with the DSL.
- 3.33.3** The DSL will liaise with parents early on to ensure that early help will be effective. If the child or parents refuse consent to an early help assessment then further advice will be taken from the Local Authority.
- 3.33.4** There may be a requirement to support other agencies and professionals in an early help assessment.
- 3.33.5** If early help is appropriate, the DSL should support liaison with other agencies and setting up an inter-agency assessment if appropriate. The case should be kept under constant review and consideration given to a referral to Children's Social Care if the situation doesn't appear to be improving.

3.34 Learning Support – SEN and Disabilities

- 3.34.1** In supporting Children at Risk it is recognised that an additional barrier can exist when recognising abuse and neglect of children with Special Educational Needs and Disabilities.
- 3.34.2** As a consequence this campus recognises the potential that extra pastoral support should be considered. This can include:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability as opposed to being indicators of abuse.
 - Children with SEN and disability can be disproportionately impacted by things like bullying without outwardly showing any signs
 - Communication barriers and difficulties in overcoming these barriers
- 3.34.3** Children with SEND are at a higher risk of peer group isolation and as a consequence this campus recognises the potential that extra pastoral support should be considered.

3.35 The Personal Education Plan and looked after children

- 3.35.1** Children who are 'looked after' will have their own personal education plan (PEP). The PEP is part of the care plan. It is a record of what needs to happen in order to enable the child to "fulfil their potential". It should reflect other education plans such as individual education plans, behaviour plans etc.
- 3.35.2** Staff in this campus recognise that previously looked after children still remain vulnerable. The DSL should make contact as necessary with the Local Authority personal advisor when individuals leave care.

3.36 Support in Campus

- 3.36.1** All class teachers and year group leaders are responsible, in conjunction with other campus staff, for the pastoral needs of the children in their care. This includes maintaining opportunity for children to share their concerns and follow the guidance in this document. Care should always be taken in regard to the discussion of sensitive issues and advice should be sought from a DSL where there are concerns.
- 3.36.2** Within the curriculum there will also be opportunities to discuss issues which some children might find sensitive. Care should be taken particularly in relation to discussion

about families and their make-up. Assumptions about members of families and the presence of both parents should be avoided both in discussion and the presentation of materials. Staff should make themselves familiar with the background of the children in their care in order to avoid distress.

3.37 Physical Contact with Students

- 3.37.1** Some form of physical contact with students by teachers is inevitable. All teachers should be aware of issues related to touching and the way in which this might be misconstrued. This relates particularly to any sensitive areas of the body. Where any uncertainty exists, a senior member of staff should be consulted.
- 3.37.2** At all times, one-to-one discussions with students should most appropriately take place in rooms which are openly visible to other members of staff.
- 3.37.3** In the event of physical restraint, it is important that only the minimum amount is used in order to prevent the student from causing injury to themselves, others or property. Following such an intervention the detail should be thoroughly recorded on CPOMS.
- 3.37.4** Where there are particularly vulnerable children this school will work with parents to write an individual behaviour plan to reduce the risk of the necessity of using reasonable force.
- 3.37.5** Staff in campus, when appropriate, will have training in restraint; it is only those members of staff who have been appropriately trained who will administer restraint methods. Further guidance on the power to restrain is covered in the Behaviour Management Policy.

3.38 Safer Recruitment

- 3.38.1** This campus adopts the approach to Safer Recruitment detailed in Part 3 of KCSIE 2018. By overtly adopting the statutory approach to Safe Recruitment and Selection we seek to deter, reject or identify people who might abuse children or are unsuitable to work with them.
- 3.38.2** All employment and identity checks will be recorded on the single central record which will be endorsed by the safeguarding trustee on a termly basis.
- 3.38.3** A HR Trustee will be appointed to oversee HR provision including recruitment and selection.

3.39 The reporting of teaching staff who are unsuitable to work with children (TRA/DBS and Charity Commission)

- 3.39.1** This campus will comply with its statutory responsibility to refer matters to the Teaching Regulation Authority (TRA) where misconduct is serious enough to potentially result in a prohibition order meaning that a person can no longer be a teacher.
- 3.39.2** This campus will also comply with its legal duty to report to DBS a person, with whom the necessary conditions are met, who;
- has harmed or poses a risk of harm to a child or vulnerable adult
 - has satisfied the harm test; or
 - has received a caution or conviction for a relevant offence and;
 - the person they're referring is, has or might in future be working in regulated activity and;
 - the DBS may consider it appropriate for the person to be added to a barred list
- 3.39.3** This campus will refer serious incidents of a safeguarding nature to the Charity Commission. These will be adverse events, whether actual or alleged, which result in significant risk to the Trust's work or reputation.

3.39.4 Reference will be made to the Financial Procedures Handbook and the Charity Commission guidance when considering Serious Incident Reporting

3.40 Checking of volunteers

3.40.1 The Campus adopts the FLT position, consistent with KCSIE 2018 and school guidance, on the checking of volunteers. All volunteers operating in regulated activity will be subject to a DBS and barring check. Those not working in regulated activity will be subject to only the DBS. All volunteers will provide two references.

3.41 Supply staff including those employed from agencies

3.41.1 For supply staff appointed by the campus, all of the regular regulatory checks will be conducted to ensure their suitability to work with children.

3.41.2 For staff appointed from an agency, the agency must provide written notification that all of the regular regulatory checks have been carried out including identity, qualifications, DBS in UK and overseas, right to work in the UK as regulated. Before the supply staff work in campus their identity must be checked.

3.41.3 The campus will, under contractual arrangements request a copy of the DBS certificate that contains any disclosures and trustees will decide if the candidate is suitable.

3.41.4 The Safer Recruitment process will be followed including all relevant checks to be carried out by the campus when supply staff go on to be employed by the campus.

3.42 Starting work before DBS and Overseas checks have been obtained

3.42.1 Staff should not start until their DBS check and any overseas checks have been obtained.

3.42.2 Exceptions to the above may need to be made very occasionally. In these cases, a risk assessment will be carried out to determine (a) whether it is safe for that individual to start work before his or her check has been verified; and (b) the level of supervision required. The individual will not be allowed to attend trips or to be alone with a pupil until their checks have come through. A record of the risk assessment and supervision deemed necessary will always be made in the notes section of the register.

3.42.3 If a DBS check reveals a conviction a risk assessment should be carried out. The School will consult the DBS website for the factors to be considered in carrying out that risk assessment.

3.43 Site Security

3.43.1 The Campus Security & Visitor Policy and procedures will be followed. Visitors to the Campus are asked to sign in and are given a badge, which confirms they have permission to be on site. Red lanyards denote a lack of security clearance and those individuals must be accompanied at all times i.e. contractors. Green or blue lanyards denote those who are security cleared such as staff.

3.43.2 All security cleared FLT NSO staff will wear identification badges with green lanyards issued from central office if on school grounds.

3.43.3 All visitors are expected to observe the campus's safeguarding and health and safety requirements to ensure children in campus are kept safe.

3.43.4 The Head Teacher will exercise professional judgement in determining whether any visitor should be escorted or supervised whilst on site.

3.43.5 This school will comply with the CCTV Policy in line with the GDPR 2018 and supporting policy.

3.44 ICT & E-Safety Policy

3.44.1 This campus has a separate ICT and E-Safety policy. It details the roles and responsibilities of the whole school community as well as the method for filtering and monitoring. Breaches are reported in accordance with the ICT and E-safety policy.

3.45 E-Safety Reporting Button

3.45.1 To ensure that students and school family have access to a confidential and direct reporting system, we have an e-safety reporting button on the main page of our Intranet. The button is for reporting concerns about e-safety, bullying, inappropriate use of computers or the internet. It is labelled as such.

3.46 Images and Photography

3.46.1 The Campus ICT and E-Safety Policy and procedures will be followed. In summary the campus will:

- use only the student's first name with an image
- ensure that students are appropriately dressed
- encourage students to tell if they are worried about any photographs that are being taken of them.

3.46.2 It would be normal practice to demonstrate campus life by way of photographs and video. If teachers, staff, trustees or visitors have any concerns about themselves being in photographs associated with the school they should bring that to the attention of the Head Teacher.

3.46.3 Volunteers acting as such within the school day must also ensure they understand and adhere to the Campus approach to the taking of photographs. It would not be acceptable for a member of teaching staff to be taking photographs of children on their personal phone and the same standards are expected of volunteers.

3.46.4 It is not generally acceptable for staff, volunteers or trustees to post photographs of children, taken within the context of the school, on social media. Photographs of your own children shared on a one to one basis via a medium such as "What's App" or "Blackberry Messaging" would be acceptable.

3.46.5 A common sense approach to the taking, sharing and posting of photographs of our children whilst at school by family and friends is requested. An appreciation of the risks is important.

3.46.6 It is not acceptable for family and friends to take photographs for anything other than personal use. Any abuse of this approach will mean the circumstances being reviewed and may result in more restrictive measures in school.

3.47 Social Media

3.47.1 Staff are expected to comply with the Trust's ICT and E-Safety Policy, which includes having no contact with students or parents via social media websites, text or personal mobile phones. Any compromise should be brought to the attention of the SLT by the staff member concerned.

3.48 Video Conferencing and Off-Site Arrangements

3.48.1 Where students are in Video Conference or other conference links with staff from other Focus Campuses there will be written assurance from the teacher's employing campus that all vetting checks, including DBS, have been carried out and these staff will be added to this school's SCR.

3.49 Extremism and Radicalisation (The Prevent Duty)

3.49.1 Focus Learning Trust has a statutory duty under The Counter-Terrorism and Security Act 2015 and the statutory Prevent Guidance 2015 to have due regard to the need to prevent people from being drawn into terrorism in all its schools.

3.49.2 Extremism is defined as vocal or active opposition to fundamental values of our society, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation is defined as the act or process of encouraging extremist views or actions in others, including forms of extremism leading to terrorism.

3.49.3 We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

3.49.4 We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

3.50 Complaints

3.50.1 Complaints from parents or pupils about the school's response to child safeguarding will be addressed using the campus Complaints Policy.

3.50.2 Complaints from staff are dealt with under the campus grievance procedures.

3.51 Schools Inspection Service (SIS)

3.51.1 The Schools Inspection Service, as the regulatory inspector, should be informed of all serious incidents, in writing to the Chief Inspector.

4.0 RESPONSIBILITIES

Post(s)	Responsibilities	Ref
Chair of the Board	<ul style="list-style-type: none"> ensure that all trustees have a current, clear Enhanced DBS Certificate That the Section 128 Check is carried out on all members of the Board. That a recorded Safeguarding Section is part of any full trustee committee meeting That a safeguarding section is on the school improvement plan (SIP) 	
Safeguarding Trustee	<ul style="list-style-type: none"> be responsible for undertaking annual reviews and evaluation at the Campus of the Safeguarding & Child Protection Policy and procedures in conjunction with the Designated Safeguarding Lead. ensure that a comprehensive annual safeguarding audit is undertaken and that all action points are recorded on the SIP and remedied. It would be recommended that the audit is the one from the LA in which the school is sited 	

	<ul style="list-style-type: none"> • ensure that the FLT half-termly safeguarding performance report is completed, discussed and any learning actioned on the SIP. • meet regularly with the DSL/Deputy to discuss updates, reviews and evaluation of the Child Protection policies and procedures • ensure that safeguarding arrangements take into account policies and procedures of the Local Safeguarding Children Board (LSCB). • have procedures in place to handle allegations against other children (peer on peer) • have procedures in place to handle incidences of youth produced sexual imagery • have procedures in place to handle allegations about staff members, volunteers or visitors to the school, including allegations against the Head Teacher and Trustees • ensure the campus's Safeguarding and Child Protection Policy is available publicly and on the campus website • be trained in child protection and inter-agency working. This training will be updated every two years or in line with the LSCB requirements. • be trained in inter-agency working (up dated every two years or in line with the LSCB requirements) ensuring an overview of Safeguarding, Child Protection and an understanding of how the associated agencies work • ensure that appropriate child protection training is in place (current and up-to-date) for the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead to a standard set by the Local Safeguarding Children's Board and is recorded on the Training Log. • ensure that the Designated Safeguarding Lead and Deputy have sufficient time, funding, training, support and resources to undertake their role and to support other staff within the campus • ensure that new staff members taking on a DSL role are appropriately trained by the LSCB • ensure that appropriate child protection training is in place as part of the induction for all staff including temporary and voluntary staff and that it is updated annually or in line with the LSCB requirements and that there is 	
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	<p>no lapse in training dates. Safeguarding training must always include an element of face to face, interactive training.</p> <ul style="list-style-type: none"> • liaise with the LA on child protection allegations against staff, including the Head Teacher or DSL • if appropriate, ensure that the DSL receives training to promote the educational achievement of children who are looked after. 	
HR Trustee	<ul style="list-style-type: none"> • ensure that the statutory responsibilities for recruitment are followed; preventing people who pose a risk of harm from working with children • ensure Safer Recruitment Procedures are followed, including pre-employment checks and vetting of new staff and volunteers working with children and records kept in line with the KCSIE 2018 and the supplementary guidance on Disqualification Requirements. • ensure that at least one person on a recruitment panel has undertaken safe recruitment training • ensure that all appropriate child protection checks and procedures are applied to staff employed by another organisation such as agency staff working with the campus's students, and that they are carried out • ensure that no barred person is allowed to work in any regulated activity • have procedures to fulfil the legal duty to make a referral to the DBS, TRA and, if appropriate, the Charity Commission in the event of dismissal of staff on safeguarding grounds • ensure that assurance is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the campus's students on another site 	
Designated Safeguarding Lead (DSL)	<ul style="list-style-type: none"> • liaise with the Safeguarding Trustee with regard to implementation of the Child Protection Policy and Procedures and that they are reviewed and evaluated annually • be trained in child protection and inter-agency working including The Prevent awareness training, institutional grooming and E-Safety training. • ensure knowledge and skills are kept up-to-date 	

	<ul style="list-style-type: none"> • ensure that all staff retain clear and well-organised written records of all concerns, discussions and decisions and the reason for those decisions using CPOMS. • keep records confidentially and review regularly so that concerning patterns of behaviour can be spotted. • Ensure the safeguarding local arrangements form is up to date and displayed in Reception and all staff working areas in school. • Ensure the Safeguarding display poster is up to date and displayed in reception and key student areas in school. • understand the assessment process for providing early help and intervention and contribute to this process • provide a working knowledge of how the LA conducts a Child Protection case conference and a Child Protection planning meeting and review conference enabling effective contribution to a case if and when required • understand and be able to contribute positively to the local Early Help process • be alert to the specific needs of children in need, those with special educational needs and young carers • be the first point of reference for staff regarding safeguarding concerns • act as a source of advice and support within the campus, be aware of new issues and latest guidance on Safeguarding • ensure that staff are familiar with the campus policy and procedure, raise awareness of CP issues among staff and encourage a culture of listening to children and taking account of their wishes and feelings • organise training on child protection, E-Safety and Prevent within campus for all staff, volunteers and trustees ensuring that it is current and up-to-date and is recorded on the Training Log • keep all staff up-to-date with knowledge and skills • complete the LSCB Annual Audit for Child Protection / Safeguarding • co-ordinate action within the campus, decide whether to refer a concern to social care and other agencies over cases of abuse and suspected abuse or to monitor the situation including supporting staff who make a direct 	
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	<p>referral to social care or the Channel programme</p> <ul style="list-style-type: none"> • make child protection referrals, recording and reporting accordingly and monitoring regularly using CPOMS • be the campus lead on CPOMS • liaise closely with agencies and services such as LA children’s social care, LADO, case manager at the LA, DBS and / or police about individual cases • ensure that when a child leaves a campus and they have a Child Protection File that it is transferred to the new school, separately from the main student file, ensuring secure transit and confirmation of receipt • provide appropriate feedback to members of staff as and when necessary • arrange counselling for members of staff as appropriate • have appropriate knowledge and training to protect and promote the welfare of a looked after child; holding details of looked after children and their contact information • liaise with the Safeguarding Trustee where a person is dismissed or left due to risk / harm to a child and that the case is referred to the DBS and TRA or if a crime has been committed, to the police. 	
<p>Headteacher</p>	<ul style="list-style-type: none"> • undertake the LSCB DSL Training • ensure that Safeguarding, including helping to protect students from a range of risks including on-line is fully explored in teaching and learning opportunities within the curriculum • ensure that students are able to identify a trusted adult to listen to their concerns • ensure that there is a Safeguarding Notice Board in the Staff Room demonstrating how the campus keeps children safe, to include e-safety. It will include how to report a concern, training dates, policies, posters, roles and responsibilities of safeguarding personnel, safeguarding up-dates, KCSIE 2018 and other publications and communications with regard to safeguarding • ensure Safeguarding Notices are displayed around the school; at reception and in all communal areas. • meet with the Designated Safeguarding Lead to be kept informed of on-going investigations 	

	<ul style="list-style-type: none"> • be the appointed member of staff to promote the achievement of looked after children • be alert to children who go missing and put in place the appropriate safeguarding response 	
Campus Staff	<ul style="list-style-type: none"> • know who holds the DSL and Deputy roles within the campus • receive annual training in child protection (This training also applies to the Head Teacher if he or she is not a deputy DSL) 	
Focus Learning Trust National Safeguarding Advisor	<ul style="list-style-type: none"> • To provide guidance to all campuses on Policy and Procedure related to Safeguarding. • To provide advice and guidance to Head Teachers and Safeguarding Trustees in the implementation of the Child Protection Policy, Procedures and for training of staff, parents, volunteers and students. • To support external reviews of the effectiveness of Safeguarding and Child Protection at a Campus. This includes providing audit tools and procedures. • To provide professional support to the Head Teacher and Trustees in the management of complex or critical incidents, once referred to the appropriate authorities. • This does not replace, and is separate from the advice provided by the LSCB, LADO and Children's Services in the event of a disclosure. 	
Regional Principal	<ul style="list-style-type: none"> • Delegated professional line management of the Head Teacher. • To verify that the Child Protection Policy and Procedures are fully implemented at the campus and to report on its effectiveness to the Board of Trustees. • To advise on improvements to the implementation of the Child Protection Policy at a campus. For example, on the impact of staff training or record keeping. • To be aware, as delegated line manager, of Safeguarding referrals having been made, including allegations against staff members. Specific details of referrals relating to children do not need to be shared. • To provide professional support in the event of disciplinary procedures against students or adults in school. • This should not, IN ANY WAY, replace advice from the LADO, Children's Services or 	

	the LSCB which should be sought in line with this policy.	
Focus Learning Trust Safeguarding Committee	<p>Terms of Reference June 2018</p> <p>Purpose</p> <p>Focus Learning Trust (FLT):</p> <ul style="list-style-type: none"> ➤ recognise their primary responsibility to safeguard children in their schools and with whom FLT have contact in the course of their activities; and ➤ wish there to be a consistency of approach between FLT and individual Focus schools on matters of operational day to day safeguarding with a sharing of best practice and learning of lessons between both. <p>In recognition of this, FLT established the Focus Safeguarding Committee (FSC).</p> <p>Membership</p> <p>The membership of the Committee is made up of:</p> <ul style="list-style-type: none"> ➤ Andrew Cuckson - (RTL for the region & NLT Member) Chair of the FSC and FLT Safeguarding Lead; ➤ Matthew Philips (Regional Principal) ➤ Adrian Diffey (Chief Operating Officer – NLT Member) ➤ Tim Browning (RTL/NLT Member with portfolio for Policy) ➤ Simon Atkinson – FLT National Safeguarding Advisor <ul style="list-style-type: none"> ➤ One Head Teacher from a Focus school on annual rotation <ul style="list-style-type: none"> ➤ One Safeguarding Trustee from a Focus school on annual rotation <p>Meetings</p> <p>The Committee will meet every two months, and otherwise as required. Every attempt should be made by members to be present.</p> <p>Responsibilities</p> <ul style="list-style-type: none"> ➤ To ensure that Safeguarding has the appropriate importance and organisational priority ➤ to ensure that FLT and Focus schools comply with their safeguarding obligations set out in relevant legislation, regulations and guidance and any rules issued by FLT; 	

	<ul style="list-style-type: none"> ➤ to make recommendations on safeguarding strategy, policies and practice, in order to ensure FLT and Focus schools' fulfilment with its safeguarding obligations; ➤ to identify and assess the safeguarding risks faced by FLT and Focus schools and to recommend measures to mitigate those risks; ➤ to hold line management (Regional Principals, Head teachers and Designated Safeguarding Leads) to account on implementation of safeguarding policies in schools; ➤ to identify and reflect on issues and patterns of concerns which may require a revision of safeguarding policies or practice; ➤ to ensure lessons are learnt across FLT and Focus schools from any poor practice or near misses identified; and ➤ To introduce and maintain a safeguarding risk register for Focus schools, for presentation to and discussion with the FLT Board. 	
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5.0 REFERENCE DOCUMENTS

Associated Policies

- Anti-Bullying Policy
- Attendance Policy
- Behaviour Management Policy
- IT and E-Safety Policy
- Curriculum Policy documents and schemes of work for PSHE
- Data Protection Policy
- Disciplinary Procedure
- Health & Safety Policy including the following procedures:
 - Educational Visits
 - First Aid including arrangements for meeting the medical needs of children
 - School Security
- Induction of new staff and volunteers
- Learning Support (SEND) Policy
- Physical Control Policy
- (The) Prevent Duty Guidance
- Recruitment Policy
- Security & Visitors Policy

- Staff Handbook
- Staff Code of Conduct
- Whistleblowing Policy
- Domestic Abuse, Stalking and Harassment policy

Additional Resource Links

- NSPCC Website Link: <http://www.nspcc.org.uk/>
- NSPCC website link to Preventing Abuse: <http://www.nspcc.org.uk/preventing-abuse/>
- CEOPs Thinkuknow programme – Keeping children safe on-line and protecting them from sexual abuse and exploitation. <https://www.thinkuknow.co.uk/Teachers/>
- Safenetwork website jointly managed by the NSPCC and Children England <http://www.safenetwork.org.uk/Pages/default.aspx>

Legislation

- Children and Families Act 2014
- Childcare Act 2006
- Counter-Terrorism and Security Act 2015
- Protection of Freedoms Act 2012
- Education Act 2011
- Children and Young Persons Act 2008
- Education and Inspections Act 2006
- Safeguarding Vulnerable Groups Act 2006
- Education (Independent Schools Standards) (England) Regulations 2014
- Education (Provision of Information by Independent Schools) (England) Regulations 2010
- GDPR 2018
- Children Act 1989

Guidance both statutory and non-statutory

- Working Together To Safeguard Children - July 2018
- DfE Guidance Keeping Children Safe In Education - September 2018
- Prevent Duty Guidance: for England and Wales 2015
- DfE Children Missing in Education - September 2016
- UKCCIS (2016) 'Sexting in Schools and Colleges' - Responding to incidents and safeguarding young people'

- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers - July 2018
- What to do if you're worried a child is being abused – Advice for practitioners - March 2015
- Child Sexual Exploitation; definition and guide for practitioners - Feb 2017
- Use of force within schools – July 2013
- Safeguarding children in whom illness is fabricated or induced – 2008
- Preventing and tackling bullying – July 2017
- School security advice – 2012
- Advice on drugs in schools – 2012
- Sexual harassment between children May 2018
- Contextual safeguarding – University of Bedfordshire - 2018

6.0 GLOSSARY

CCTV – Close Circuit television

Child – includes everyone under the age of 18 – Children Act 1989

Child Protection – refers to the process undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Child Abuse – is a term used to describe ways in which children are harmed by someone often in a position of power. Abuse may fall into the categories of physical, emotional (including regular exposure to domestic violence), sexual and neglect (Appendix 5).

CPOMS – Child Protection On-line Management System

CRB – Criminal Records Bureau

DfE – Department of Education

DBS – Disclosure and Barring Service

LADO - Local Authority Designated Officer – officers from the local authority designated as being the primary point of liaison in the event of allegations of abuse being made against the Headteacher, principal, proprietor or member of governing body.

DSL - Designated Safeguarding Lead – member of staff in school who leads on Safeguarding and Child Protection – both staff training and management of referrals. Must be a school Senior Leader.

DDSL - Deputy Designated Safeguarding Lead – Deputy as above

FGM – Female Genital Mutilation

GDPR – General Data Protection Regulations

IT – Information Technology

KCSIE – Keeping Children Safe in Education

LA - Local Authority

LSCB - Local Safeguarding Children Board

MASH – Multiagency Safeguarding Hub. Often the first point of referral from school for a Child Protection case.

NSPCC – National Society for the Protection of Cruelty to Children

Parent – refers to birth parents and other carers of children.

PEP – Personal Education Plan

PoP – Peer on Peer

Principle of Proportionality - The least intrusive response appropriate to the risk presented.

PSHE – Personal, Social, Health and Economic

Safeguarding - the process of protecting children from maltreatment, preventing the impairment of children’s health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. This includes all forms of maltreatment including Youth Produced Sexual Imagery, peer on peer abuse, cyber bullying and radicalisation.

SCR – Single Central Record

SEND – Special Education Needs and Disabilities

SIMS – School Information Management System

Staff – refers to all those working for or on behalf of the campus, full time or part time, temporary or permanent, in either a paid or a voluntary capacity.

TRA- Teaching Regulations Authority

UKCCIS – UK Council for Child Internet Safety

7.0 AUDIT AND ASSURANCE

What steps will be undertaken to assess how well the policy is working

What criteria will be used for assurance that the policy is being met.

Element to be monitored	Lead	Tool	Freq	Reporting Arrangements	Acting on Recommendations and Lead(S)	Change in Practice and Lessons to be shared
Effective operational policy use	Head	Staff discussion	Each year	Report to trustees		
Effective use	Trustees	Trustee discussion	Each year	Recorded in full Committee minutes		

8.0 APPENDICES

Appendix 1 – FLT Safeguarding Governance guidance document

Appendix 2 – FLT Training Strategy

Appendix 3 – Campus Safeguarding Code of Conduct

Appendix 4 – “How to Guide” – “How to Recognise and Respond to Child Abuse and Safeguarding Matters”

Appendix 5 – Working Together to Safeguard Children 2018

Appendix 6 – FLT Communications Strategy

Appendix 7a – Display notice – Safeguarding Display Posters

Appendix 7b Display notice – Safeguarding local arrangements.

Appendix 7c Display notice – Safeguarding Contacts Poster

