



Tudor Grange Academies Trust

Safeguarding and Child Protection Policy

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Author/originator	C Waterhouse
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Individual Schools will appoint:

Director of Inclusion	Clare Waterhouse
Designated Safeguarding Lead	Oliver Norman
Deputy Safeguarding Lead(s)	Claire Evans
	Lucy Brooks
Early Years Designated Safeguarding Lead	Oliver Norman
Prevent Lead:	Oliver Norman

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1 Introduction

- 1.1 The School fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children, which is defined 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 the impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- 1.2 Safeguarding and promoting the welfare of children is everyone’s responsibility. ‘Children’ includes everyone under the age of 18.
- 1.3 This policy has been developed to help the School fulfil its safeguarding obligations in accordance with the principles and legal requirements established by the Children Acts 1989 and 2004; the Education Act 2002; the Prevention of Terrorism Act 2005; the Human Rights Act 1998; the Equality Act 2010; and the Counter Terrorism and Security Act 2015; and in line with government publications the *Teachers’ Standards*, *‘Working Together to Safeguard Children’* 2026, *‘Keeping Children Safe in Education’* September 2026, *‘What to do if you’re worried a child is being abused 2015- Advice to Practitioners’* and *‘Early Years Foundation Stage Statutory Framework’*.
- 1.4 Our policy applies to all staff, trainee teachers, governors, supply staff, contractors and volunteers working in the school and is available to parents and carers on our website and in paper form from reception. This policy can be made available in large print or other accessible format if required.
- 1.5 There are six main elements to our policy:
 - 1.5.1 ensuring we practice Safer Recruitment in checking the suitability of staff and volunteers to work with children;
 - 1.5.2 raising awareness of child protection issues and equipping children with the skills needed to keep them safe;

- 1.5.3 developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse, neglect or exploitation;
 - 1.5.4 equipping staff, trainee teachers, governors, supply staff, contractors and volunteers with the necessary information and training to enable them to meet their Child Protection responsibilities;
 - 1.5.5 supporting pupils who have been identified as in need of universal services and community-based Early Help or the targeted early help level of Family Help or at risk of harm in accordance with their agreed child protection, Child in Need or Early Help Plan;
 - 1.5.6 establishing a safe environment in which children can learn and develop.
- 1.6 We ensure that all pupils (including those who have a faith background and those who do not) have a thorough understanding of, and positive approach to, the beliefs and values that under-pin modern British society. This “Golden Thread” runs through our approach to teaching and learning. To ensure pupils remain safe and are not put at risk by the promotion of violent and/or extremist views, the study of democratic principles and the right of all individuals to equality of opportunity is an integral part of our school curriculum, [including RE] and the development of pupils’ spiritual, moral, social and cultural skills and awareness.
- 1.7 We ensure a whole school approach to safeguarding and operate with the best interests of the children at the heart of everything we do. We ensure other School policies have links with our safeguarding policy to ensure that they reinforce all aspects of the Prevent agenda and all aspects of our Child Protection strategies, including preventative education, are reinforced through the school curriculum and our approach to teaching and learning wherever possible.

2 Responsibilities and Duties

- 2.1 Legislation places general and specific responsibilities to ensure effective safeguarding on the School and the wider trust as a whole, as well as specific duties on the relevant boards, the DSL and Principals.
- 2.2 **General Duties**
- 2.2.1 The School will take reasonable measures to:
 - 2.2.2 establish and maintain an environment where children feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to;
 - 2.2.3 ensure children know that there are adults in the School whom they can approach if they are worried;
 - 2.2.4 include opportunities in the curriculum, specifically through Relationships Education, Relationships and Sex Education, Health Education and IT, for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help;
 - 2.2.5 ensure there are systems in place for children to express their views and give feedback e.g. through school/class councils, safety questionnaires, participation in anti-bullying and online safety events;
 - 2.2.6 ensure that the child's thoughts, wishes and feelings are sought and recorded on all referrals and taken into account when determining what action to take and what services to provide to protect children from harm;

- 2.2.7 ensure it has a senior leader nominated as DSL who has received appropriate training and support for this role;
- 2.2.8 ensure it has at least one member of staff who will act in the absence of the DSL (Deputy DSL);
- 2.2.9 ensure every member of staff (including temporary and supply staff, trainee teachers and volunteers), regular visitors to our School and the Local Governing Body is told where to find this policy, knows the name of the DSL and any deputies, is informed of the School's procedures in reporting concerns and understands their role;
- 2.2.10 ensure that the DSL and/or a deputy DSL is always available to speak to during school hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities;
- 2.2.11 ensure all staff and volunteers are alert to the potential need for Early Help and are aware of children whose vulnerabilities may indicate a greater need and of the role they may play in supporting other agencies and professionals in a community-based Early Help or targeted early help (Family Help) assessment;
- 2.2.12 ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse, neglect and exploitation, including the specific issues of Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Children Missing Education (CME), Radicalisation and Extremism (Prevent) and Sexual Violence and Sexual Harassment, and maintain an attitude of 'it could happen here';
- 2.2.13 ensure all staff and volunteers understand their responsibility for referring any concerns in a timely manner and are aware that they may raise concerns directly with Children's Social Care if they believe their concerns have not been listened to or acted upon;
- 2.2.14 ensure that parents/carers have an understanding of the responsibility placed on the School and staff for child protection by setting out its obligations and publishing its policy on the School website;
- 2.2.15 ensure that it receives written confirmation that the appropriate child protection checks and procedures have been carried out on staff from another organisation;
- 2.2.16 operate a lettings policy which ensures the suitability of adults working with children on school sites at any time;
- 2.2.17 ensure that community users organising on-site activities for children are aware of, and understand the need for compliance with, the School's child protection guidelines and procedures;
- 2.2.18 ensure that the duty of care towards its pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice;
- 2.2.19 ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines;
- 2.2.20 be aware of and follow procedures set out by the DfE and the local safeguarding partners where an allegation is made against a member of staff, trainee teacher, governor, supply staff, contractor or volunteer, including making a referral to the Local Authority Designated Officer (LADO) and ensuring that a referral is made to the DBS and/or Teaching Regulation Agency if a person in regulated activity has been dismissed, removed

or suspended from regulated activity where the harm criteria is met, or would have been had they not resigned;

- 2.2.21 operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training;
- 2.2.22 ensure that the content and themes of assessed performances in drama and dance are appropriate for a school setting and appropriate to the age group of the children that are performing
- 2.2.23 and regularly review and update our procedures at least annually.

2.3 Specific duties

- 2.3.1 Every employee and governor of the School as well as every volunteer who assists the School is under a general legal duty to:
 - 2.3.1.1 protect children from abuse;
 - 2.3.1.2 be aware of the School's child protection procedures and to follow them;
 - 2.3.1.3 know how to access and implement the School's child protection procedures, independently if necessary;
 - 2.3.1.4 keep a sufficient record of any significant complaint, report, conversation or event in accordance with this policy; and
 - 2.3.1.5 report any matters of concern to the DSL.
- 2.3.2 Any School staff connected to the School's Early Years and Later Years provisions are under an ongoing duty to inform the School if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to [Disqualification under the Childcare Act 2006](#) for further information about this duty and to their contract of employment in respect of their ongoing duty to update the School.
- 2.3.3 **The Board of Trustees will:**
 - 2.3.3.1 ensure that arrangements are in place to carry out functions in respect of safeguarding and promoting the welfare of children and have regard to statutory guidance by the Secretary of State;
 - 2.3.3.2 ensure all Academies in Tudor Grange Academies Trust meet their duties with regard to safeguarding and child protection;
 - 2.3.3.3 ensure that policies and procedures are in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare, e.g. safeguarding and child protection policy, staff code of conduct, abuse allegations procedures;
 - 2.3.3.4 ensure that there are appropriate safeguarding responses to children missing from education;
 - 2.3.3.5 ensure all Academies have a Designated Safeguarding Lead (DSL) and deputy(ies) and that they have undergone training within the last two years;
 - 2.3.3.6 ensure that a Designated Teacher is appointed to promote the educational achievement of children who are looked after, previously looked after and in

kinship care, that they have the skills, knowledge and understanding necessary to keep these children safe, and that the information they need in relation to the child's looked after status, their care arrangements and the levels of authority delegated to the carer by the authority looking after them is made available to them;

- 2.3.3.7 ensure that children are safeguarded from harmful and inappropriate online material by ensuring that appropriate filtering and monitoring systems are in place;
- 2.3.3.8 ensure that children are taught about safeguarding through teaching and learning opportunities;
- 2.3.3.9 ensure that children's wishes and feelings are considered where there is a safeguarding concern;
- 2.3.3.10 ensure that there is a Single Central Record of all staff and others who work in the School;
- 2.3.3.11 monitor the work of the Director of Inclusion and support and challenge on matters relating to safeguarding;
- 2.3.3.12 ensure that any weaknesses brought to its attention relating to safeguarding are remedied without delay and that it complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from becoming terrorists or supporting terrorism;
- 2.3.3.13 ensure that they have the status and authority to fulfil all the roles of the individual School DSLs if required.

2.3.4 The Director of Inclusion will:

- 2.3.4.1 monitor the delegated responsibilities for safeguarding in the scheme of delegation;
- 2.3.4.2 raise awareness of safeguarding issues with the Principal, the Executive Team and the Educational Performance Committee (EPC);
- 2.3.4.3 monitor the quality and effectiveness of safeguarding provision within the School and update the Principal, the Executive Team and the EPC on this;
- 2.3.4.4 regularly review and update the Trust safeguarding policy and related procedures and ensure that these are available on the School website;
- 2.3.4.5 undertake annual quality assurance checks relating to safeguarding at each School to ensure effective safeguarding practices are in place;
- 2.3.4.6 meet fortnightly as part of the Executive Board Safeguarding (EBS) to discuss an overview of safeguarding at each School;
- 2.3.4.7 provide information for the CEO's reports to the EPC;
- 2.3.4.8 ensure the DSL and Deputy DSL role is explicit in the role holders' job descriptions and that the DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility;
- 2.3.4.9 ensure the School DSL is supported in fulfilling their responsibilities;

- 2.3.4.10 ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in part one of '*Keeping Children Safe in Education*';
- 2.3.4.11 ensure that the School's safeguarding arrangements take into account the procedures and practice of the local safeguarding partners;
- 2.3.4.12 ensure that safeguarding responses are put in place in cases where children go missing from education;
- 2.3.4.13 ensure that senior leaders at the School are involved in quality assurance processes, including the analysis of referrals and concerns, enabling the School to be dynamic in response to identified patterns and the bespoke needs of the local community.

2.3.5 The Local Governing Body will:

- 2.3.5.1 support the school with required actions from the Director and CEO's reports to the EPC;
- 2.3.5.2 gather pupil voice to contribute to the monitoring of priorities for safeguarding pupils;
- 2.3.5.3 track themes in parental complaints in relation to safeguarding;
- 2.3.5.4 report any serious or persistent concerns to the Board of Trustees.

2.3.6 The Principal will:

- 2.3.6.1 ensure that safeguarding policies and procedures are fully implemented and followed by all staff, trainee teachers, governors, supply staff, contractors and volunteers;
- 2.3.6.2 ensure that sufficient funding, support time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection;
- 2.3.6.3 ensure that the DSL and Deputy DSLs are made known to all staff and visitors through information on the website and in school;
- 2.3.6.4 ensure that all staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedure;
- 2.3.6.5 ensure that all staff know how to report concerns about adults in the School and have oversight of and manage all concerns logged on Confide;
- 2.3.6.6 ensure that all allegations of abuse against staff are reported to the LADO in a timely manner;
- 2.3.6.7 ensure that the local authority is informed of all deletions from the admission register when a child is taken off roll and that, where a parent/carers has expressed their intention to electively home educate their child, the school works with the LA and other key professionals to ensure the parents/carers have considered what is in the best interests of the child, particularly where a child has SEND, is vulnerable, and/or has a social worker;

- 2.3.6.8 respond to any concerns raised by the LGB in relation to the Director or CEO's reports to the EPC;
- 2.3.6.9 ensure that any returns requested by the local authority or local safeguarding partners are completed in a timely manner;
- 2.3.6.10 ensure that robust cover arrangements are in place to ensure continuity of safeguarding responsibilities when the DSL is unavailable.

2.3.7 The DSL will:

- 2.3.7.1 co-ordinate action on safeguarding and promoting the welfare of children within the School setting. Each School DSL has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff.
- 2.3.7.2 The DSL is responsible for:
- 2.3.7.3 taking lead responsibility for safeguarding and Child Protection, including online safety and understanding the filtering and monitoring systems and processes in place;
- 2.3.7.4 organising child protection induction training for all newly appointed staff and whole staff training, refreshed at least every 3 years with annual updates as required;
- 2.3.7.5 providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in part one of *'Keeping Children Safe in Education'*;
- 2.3.7.6 undertaking, in conjunction with the Principal and Trust Lead for Safeguarding, an annual audit of safeguarding procedures;
- 2.3.7.7 making use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Children's Social Care intervention is met;
- 2.3.7.8 referring a child to Early Help and/or Children's Social Care as appropriate, when there are concerns about possible abuse, neglect and exploitation;
- 2.3.7.9 referring a child to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups;
- 2.3.7.10 liaising with the Principal to ensure they are informed of all child protection issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- 2.3.7.11 liaising with other staff (pastoral support staff, school nurses, counsellors, IT technicians, online safety co-ordinators, SENCos and Designated Teachers for LAC, Senior Mental Health Leads, etc.) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- 2.3.7.12 helping promote educational outcomes by sharing relevant information with staff about the welfare, safeguarding and child protection issues that children are experiencing or have experienced with a view to better understanding how best to support these children in school;

- 2.3.7.13 keeping written records of concerns about children and ensuring these are kept up to date, even where there is no need to refer the matter immediately;
- 2.3.7.14 ensuring all child protection records are kept securely, separate from the main pupil file, and in locked/password protected locations or as secure online MyConcern files;
- 2.3.7.15 ensuring that all child protection files are transferred in a safe and timely manner when a child moves settings, both between and across phases, within and out of county and including in-year transfers, and that a receipt of transfer is obtained; the transfer should take place as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term;
- 2.3.7.16 notifying the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a Child Protection Plan;
- 2.3.7.17 monitoring unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in line with 'missing children' procedures;
- 2.3.7.18 developing effective links with relevant agencies and other professionals and co-operating as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review Child Protection Conferences, Core Group and Child in Need review meetings;
- 2.3.7.19 contributing to assessments and providing a report to initial and review conferences which has been shared with parents first, whenever possible;
- 2.3.7.20 contributing to the co-ordination of a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe on-line, and the promotion of fundamental British values;
- 2.3.7.21 acting as a source of support, advice and expertise for all staff.

3 Procedures

- 3.1 We will follow the procedures set out by the local safeguarding partners and take account of guidance issued by the Department for Education (DfE). Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the local safeguarding partner and local inter-agency procedures and levels of need guidance, liaising with the safeguarding partner and working with other agencies. This information can be found on our local safeguarding partners website at: [WSAB - Worcestershire Safeguarding Boards](#)
- 3.2 All staff are prepared to identify children who may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. Early Help means providing support as soon as a problem emerges at any point in a child's life. Any child may benefit from this, but staff are particularly alert to the potential need for Early Help for a child who: is disabled; has SEND or a mental health need; is a young carer; is pregnant or a parent; is showing signs of being drawn into anti-social or criminal behaviour; has exhibited early signs of abusive, violent or harmful behaviours; is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

frequently goes missing from education, home or care; has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable or is at risk of being permanently excluded; is at risk of modern slavery, trafficking, sexual and/or criminal exploitation; is at risk of being radicalised into terrorism; has a parent/carer in custody or is affected by parental offending; is in challenging family circumstances (e.g. drug or alcohol misuse, adult mental health issues, domestic abuse); is misusing drugs or alcohol themselves; is at risk of honour-based abuse; or is privately fostered.

3.3 If a student is aged 18 or over, they are legally classed as an adult. In the event that a student meets the following criteria, they are considered to be a 'vulnerable adult' in accordance with The Police Act 1997 (Enhanced Criminal Records Certificates) (Protection of Vulnerable Adults) Regulations (2002):

- The student has disabilities which result in (a) dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions; (b) severe impairment in the ability to communicate with others; or (c) impairment in a person's ability to protect himself from assault, abuse or neglect.
- The student has conditions (a) a learning or physical disability; (b) a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or (c) a reduction in physical or mental capacity.
- The student is receiving services (a) accommodation and nursing or personal care in a care home; (b) personal care or nursing or support to live independently in his/her own home; (c) any services provided by an independent hospital, independent clinic, independent medical agency or National Health Service body; (d) social care services; or Issue 8: 22/03/2019 (e) any services provided in an establishment catering for a person with learning difficulties.

3.4 In the event that safeguarding concerns arise with respect to a vulnerable adult, staff will liaise and seek advice from appropriate adult services to ensure that safeguarding measures are enacted.

3.5 **Reports of abuse, neglect or exploitation**

3.5.1 Every report or suspicion of abuse, neglect or exploitation from within or outside the School, which relates to pupils of the School, will be taken seriously and action will be taken in accordance with this policy.

3.5.2 The child protection training provided to staff considers the types and signs of abuse, neglect and exploitation staff should be aware of. All staff are aware of and alert to potential indicators of abuse, neglect, exploitation and modern slavery, and understand that children can be at risk at school, at home, in the community and online. Further detail on the types and indicators of abuse, neglect and exploitation can be found in ['Keeping Children Safe in Education'](#) and ['Working Together to Safeguard Children'](#), as well as section 6 of this policy.

3.5.3 Every member of staff, including trainee teachers, supply staff, contractors and volunteers working with children at our School, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned, particularly when considering child on child abuse. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

- 3.5.4 If a member of staff or visitor to the School is concerned that a pupil may be at risk of, or suffering, harm, or receives a disclosure of abuse, the matter should be referred to the Designated Safeguarding Lead (DSL) as soon as possible, or, if unavailable, to a Deputy DSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff or Children's Social Care.
- 3.5.5 Children reporting abuse, exploitation or neglect will be reassured that they are being taken seriously, supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, neglect, exploitation, sexual violence or sexual harassment and should never be made to feel ashamed for making a report. To avoid alarming or distressing children, it will be explained that the law is in place to protect them rather than criminalise them.
- 3.5.6 All staff are aware that children may not feel ready or know how to disclose abuse, exploitation or neglect and/or may not recognise their experiences as harmful. Exercising professional curiosity and knowing what to look for is vital for early identification of children in need of help or protection. Staff should determine how best to build trusted relationships with children and young people which facilitate communication.
- 3.5.7 All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline.
- 3.5.8 All concerns about a child or young person should be reported without delay and recorded in writing. The School uses a software package called MyConcern to support safeguarding reporting. MyConcern is a safe and secure method of recording and managing all safeguarding concerns and meets all DfE statutory guidance and school inspection standards. Staff should report any concern using this online reporting system. Any original notes should be signed, dated and attached to the child's MyConcern file. Any questions about the use of MyConcern should be directed to the DSL. If a concern is not able to be logged on MyConcern due to technical or other reasons, it must be recorded in writing using the School's agreed paper template (see Annex 2). If the agreed template form is unavailable, or it would prevent the child disclosing should the member of staff have to go and find the form, then contemporaneous notes can be made on a piece of paper, providing it has the date and time, is signed, and the note is kept with all subsequent information on the child.
- 3.5.9 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's Social Care as required. All information and actions taken and the reasons for any decisions made, including decisions not to make referrals to another agency such as Children's Social Care or the Prevent programme, will be fully documented. All referrals will be made in line with local procedures as detailed on the local safeguarding partners website.
- 3.5.10 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

- 3.5.11 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or Principal. Concerns should always lead to help for the child at some point.
- 3.5.12 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Social Care or the police, if the situation is an emergency and the DSL, their deputy and the Principal are all unavailable, or if they are convinced that a direct report is the only way to ensure the pupil's safety.
- 3.5.13 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy, should raise their concerns with the Principal or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children's Social Care directly with their concerns.
- 3.5.14 It is **not** the responsibility of School staff to investigate welfare concerns or determine the truth of any disclosure or allegation. However, all staff have a duty to recognise concerns and pass on the information in accordance with the procedures outlined in this policy.
- 3.5.15 All staff are particularly reminded:
- 3.5.15.1 from October 2015, teachers must report to the police cases where they discover that an act of Female Genital Mutilation appears to have been carried out. The only exception of reporting is where a teacher knows that another teacher or healthcare professional has already made a report relating to this specific incident. The duty does not apply where a pupil is 18 or over. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care as appropriate:
- 3.5.15.2 normal referral processes must be used when there are concerns about children who may be at risk of becoming terrorists or supporting terrorism.
- 3.6 Police and Criminal Evidence Act and Appropriate Adults
- 3.6.1 We are aware of the requirement for children to have an appropriate adult with them when in contact with police officers who suspect them of an offence. The Police and Criminal Evidence Act Code of Practice ([PACE Code C 2019](#)) states that anyone who appears to be under 18 shall be treated as a child and if a person of any age is vulnerable then that person is entitled to be accompanied by an appropriate adult at any point. The DSL will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on the child's safeguarding chronology on MyConcern.
- 3.6.2 An appropriate adult means: the parent or guardian or, if the child is in the care of the local authority, a person representing that authority; a social worker from the local authority; or another responsible adult aged 18 or over who is not a police officer, employed by or under the direction or control of the police or a person who provides services to the police.
- 3.7 If the DSL does not feel that the police officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

3.8 Action by the Designated Safeguarding Lead

- 3.8.1 On being notified of a complaint or suspicion of abuse, the action to be taken by the DSL will take into account:
 - 3.8.2 the local inter-agency procedures of the local safeguarding partners;
 - 3.8.3 where relevant, local information sharing protocols relating to Channel referrals;
 - 3.8.4 the nature and seriousness of the suspicion or report. A report involving a serious criminal offence, including the identification of someone who may already be engaged in illegal terrorist activity, will always be referred to Children's Social Care services, and if appropriate the police;
 - 3.8.5 the child's wishes and feelings (having due regard to the duty to report to the police information which would be of material assistance in detecting terrorism); and duties of confidentiality, so far as applicable. If there is room for doubt as to whether a referral should be made, the DSL may consult with Children's Social Care on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to Children's Social Care services will be made without delay (and in any event within 24 hours).
 - 3.8.6 If the initial referral is made by telephone, the DSL will confirm the referral in writing to Children's Social Care services within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact Children's Social Care services again.
 - 3.8.7 In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the DSL will liaise with Children's Social Care and where appropriate an interagency assessment will take place, including use of Early Help and Team Around the Child approaches, as necessary. Decisions to seek such support for a pupil will be taken in consultation with parents unless there are reasonable grounds for suspecting that in doing so the pupil will be at risk of significant harm.
 - 3.8.8 Where relevant, the School will co-operate with the Channel Panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to becoming a terrorist or supporting terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.
 - 3.8.9 All information and actions taken, including the reasons for any decisions made, will be fully documented.
- 3.9 Dealing with safeguarding concerns and allegations against staff, trainee teachers, governors, supply staff and volunteers
- 3.9.1 The School has procedures for dealing with safeguarding concerns and allegations against staff, trainee teachers, governors, supply staff and volunteers who work with children, including low level concerns that do not meet the harm threshold, that aim to strike a balance between the need to protect children from abuse and the need to protect staff, trainee teachers, governors, supply staff and volunteers from false or unfounded allegations. These procedures are set out in our separate Abuse Allegations Procedures and follow the DfE guidance found in Part 4 of '*Keeping Children Safe in Education*'.

- 3.9.2 If such an allegation is made, the member of staff receiving the allegation will immediately inform the Principal, unless the allegation concerns the Principal, in which case the Chair of Governors will be informed immediately.
 - 3.9.3 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children. The Local Authority Designated Officer (LADO) will be informed immediately and in any event within one working day of all allegations against staff, trainee teachers, governors, supply staff and volunteers that come to the School's attention and appear to meet the criteria set out in our Allegations Abuse Procedures.
 - 3.9.4 The School will follow the DfE and LA procedures for managing allegations against staff and be guided by the LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.
 - 3.9.5 The School will report to the DBS where permission has been withdrawn for a teacher, member of staff, supply staff or volunteer to teach or where permission would have been withdrawn if the teacher had not left, where that teacher, member of staff, supply staff or volunteer posed a risk of harm to or had harmed children. The referral will be made as soon as possible, usually on conclusion of an investigation when an individual has been removed from regulated activity.
 - 3.9.6 Tudor Grange Early Years Foundation Stage (EYFS)
 - 3.9.7 The School will inform Ofsted of any allegations of serious harm or abuse by any person living with, working with or looking after children on the premises of the Early Years (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.
 - 3.9.8 These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.
 - 3.9.9 Detailed guidance is given to staff, trainee teachers, governors, supply staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in Tudor Grange Academies Trust Staff Code of Conduct.
- 3.10 Abuse of Position of Trust
- 3.10.1 We recognise that as adults working in the School, we are in a relationship of trust with the pupils in our care and acknowledge that it could be considered a criminal offence to abuse that trust.
 - 3.10.2 We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust.
 - 3.10.3 We acknowledge that where a teacher over the age of 18 engages in activity with a pupil under the age of 18, then this constitutes a specific breach of trust offence.
 - 3.10.4 We recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.
- 3.11 Allegations against pupils
- 3.11.1 Allegations against pupils should be reported in accordance with the procedures set out in this policy. A pupil against whom an allegation of abuse has been made may be

suspended from the School during the investigation and the School's policy on behaviour, discipline and sanctions will apply.

- 3.11.2 The School will take advice from Children's Social Care services on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse.
 - 3.11.3 Where a child discloses safeguarding allegations against another pupil in the same setting, the DSL should refer to the procedures of the local safeguarding partners and seek advice from Children's Social Care before commencing its own investigation or contacting parents/carers. In cases of harmful sexual behaviour, including sexual violence and sexual harassment, the guidance in Annex 7 of this policy should be followed.
 - 3.11.4 Where an allegation is made against a pupil, both the victim and the alleged perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed.
- 3.12 Informing parents/carers
- 3.12.1 We recognise that good communication with parents/carers is crucial in order to safeguard and promote the welfare of children effectively. We will ensure that parents/carers have an understanding of the responsibilities placed on the School and staff to safeguard children and their duty to co-operate with other agencies in this respect.
 - 3.12.2 Parents/carers will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Principal, the Local Authority Designated Officer, Children's Social Care services and/or the police before discussing details with parents/carers. We will undertake appropriate discussion with parents/carers prior to involvement of another agency, ***unless to do so would place the child or an adult at further risk of harm or would impede a criminal investigation***. See section 5 for further details on information sharing and confidentiality.
 - 3.12.3 In relation to Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/carer) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

4 Training

4.1 Induction

- 4.1.1 When staff join our School they will be informed of the safeguarding and child protection children arrangements in place. They will be given a copy of this policy including its Annexes, Part 1 of 'Keeping Children Safe in Education', the School's safeguarding response to children who go missing in education, the Behaviour Policy and the School's Staff Code of Conduct and told who the DSL is, what this role includes and who acts in their absence. Each new member of staff, or temporary or supply member of staff, will be required to sign to say they have read and understood these documents and their legal duties and responsibilities in relation to them.
- 4.1.2 All staff will receive induction in safeguarding children. The induction programme will include basic child protection information relating to signs and symptoms of abuse, neglect and exploitation, how to manage a disclosure from a child, when and how to

record a concern about the welfare of a child, advice on safe working practice and online safety including expectations, roles and responsibilities in relation to filtering and monitoring. It will also detail the role of the DSL and their identity and contact details together with that of the Deputy DSL(s), and provide initial training on how to use MyConcern, the School's safeguarding reporting system.

- 4.1.3 All trainee teachers, volunteers, supply staff, contractors and regular visitors to the School will be told where our policy is kept, the name of the DSL and Deputy DSL(s) and informed of the School's procedures for reporting concerns.

4.2 Child Protection training

- 4.2.1 All staff, including the Principal will receive a copy of this policy and Part 1 of '*Keeping Children Safe in Education*', and will be required to confirm that they have read and understood these.
- 4.2.2 All staff will receive appropriate training in child protection and safe working practice, updated at least every three years. Training will include signs and symptoms of abuse, neglect and exploitation, as well as specific safeguarding issues, such as CSE, CCE, FGM, Prevent, online safety and child on child abuse, including sexual violence and sexual harassment. Training will also include how to record and report concerns, both within the School and to Children's Social Care. In addition, they will receive safeguarding and child protection updates regularly. Training will include guidance on the duties of staff in relation to both children in need and children at risk of harm.
- 4.2.3 Staff with specific responsibility for safeguarding children will undertake training at a level suitable to their role and responsibilities, updated every two years. In addition to formal training, the DSL and deputies will update their knowledge and skills via newsletters, briefings, network meetings, seminars and webinars at regular intervals.
- 4.2.4 Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, FGM, radicalisation, child on child abuse and management of allegations of abuse and cascade the learning from this training to the rest of the staff.
- 4.2.5 Staff development training will also include training on online safety, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and, where they have not been able to access other Prevent training assessed as appropriate for them by the School, the online [Prevent Duty training](#) by the Home Office.
- 4.2.6 Governors and trustees will receive appropriate training to enable them to fulfil their safeguarding responsibilities and provide strategic challenge to assure themselves that safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding.

5 Information Sharing, Confidentiality and Record Keeping

- 5.1 Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. As a school, we have clear powers to share, hold and use information for these purposes. We will be proactive in sharing information as early as possible to help identify assess and respond to risks or concerns about the safety and welfare of children.

- 5.2 All personal information will be processed fairly and lawfully in line with our duties under the Data Protection Act 2018 and GDPR and will be held safely and securely. Safeguarding teams across the Trust will adhere to GDPR and ensure that all documents containing personal or sensitive information are handled in line with the School's GDPR Policy. However, we recognise that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information must not be allowed to stand in the way of the need to safeguarding and promote the welfare of children. 'Safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data and to do so without consent where there is good reason to do so, where the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, where it cannot be reasonably expected that a practitioner gains consent, or where to gain consent would place a child at risk. Child protection takes precedence when serious concerns exist.
- 5.3 As well as allowing for information sharing, the Data Protection Act 2018 and GDPR allow schools to withhold information in circumstances where it is warranted because it would put a child at risk of serious harm. This may be particularly relevant where a child is affected by domestic abuse perpetrated by a parent or carer. Schools must withhold information where a child is in a refuge or other form of emergency accommodation and a person may harm a child or put them at risk of harm.
- 5.4 Child protection and safeguarding information is recorded and stored on MyConcern. This method has been risk assessed in conjunction with our Data Protection Officer using a Data Protection Impact Assessment to determine the nature, scope and context of the data processing. This is subject to regular review.
- 5.5 We recognise that all matters relating to Child Protection are confidential.
- 5.6 The Principal or DSL will disclose any information about a pupil to other members of staff on a need to know basis only.
- 5.7 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 5.8 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.
- 5.9 When a child about whom concerns have been raised and recorded leaves the School, the DSL will consider if it would be appropriate to share information with the new school in advance of the child leaving, in order to ensure that support is in place for when the child arrives.
- 5.10 Any member of staff receiving a disclosure of abuse, neglect or exploitation from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (ideally within the hour) writing down exactly what was said, using the child's own words as far as possible. Concerns will be recorded using MyConcern.
- 5.11 All records of a child protection nature will be passed to the DSL including case conference or core group minutes, Child Protection Plans and written records of any concerns. Child protection records are kept securely with only appropriate persons having access to them.
- 5.12 Any referrals made to other agencies, including referrals to Children's Social Care, will be copied prior to sending and stored in the child's MyConcern file.

- 5.13 The DSL will maintain and regularly audit the School's child protection records and ensure that each stand-alone file includes a chronology of significant events and that information and contact details are accurate and up-to-date.
- 5.14 The DSL will ensure that the child protection record is transferred in a safe and timely manner when a child moves school, ensuring receipt of transfer is obtained. This must be within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. Safeguarding records will be transferred separately from the main pupil file and confirmation of receipt will be obtained. The legal basis and time scale for this can be found in The Education (Pupil Information) (England) Regulations 2005. Parental consent is not required.
- 5.15 Responsibility for maintaining pupil safeguarding records passes to the 'last known school'. The school is the last known school if the pupil left the secondary phase at 16 years old or for post-16 or independent education, or if at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died. Tertiary colleges are not included in this definition; therefore the school will retain the record. However, the college must receive a copy of the child protection file, as per the requirements of *Keeping Children Safe in Education*.
- 5.16 The DSL may copy child protection records generated by the School, including the child protection chronology, prior to transfer and retain for as long as is necessary (usually until the child reaches the age of 25), where there is justification for believing that the records may be required as evidence of the school's involvement with the child for statutory purposes, e.g. court cases or serious case reviews. When the records are no longer required, they will be securely disposed of.
- 5.17 The Independent Inquiry into Child Sexual Abuse (IICSA) found that long-term retention of records is an important part of supporting victims of child sexual abuse and bringing perpetrators to justice. This is because victims and survivors may take decades to come to terms with what has happened to them and potentially decide to take action to report a crime. The School will retain such records for 75 years, in line with the IICSA recommendation.
- 5.18 Despite upholding confidentiality of a child's complaint or abuse where possible, there will be circumstances where the DSL and the Principal will need to disclose information to certain other staff and may need to refer a child to certain agencies.
- 5.19 The School is entitled to not release information under a subject access request (SAR) if it deems that this would put someone at risk of harm.

6 Specific Safeguarding Issues

- 6.1 All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual making or sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Staff should be aware of the following specific safeguarding issues and refer to Part I of '[*Keeping Children Safe in Education*](#)' for further detail on these issues.
- 6.2 Staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside the School. Staff, and

particularly the DSL, should always consider whether children are at risk of abuse or exploitation in situations outside their families. They may be vulnerable to multiple harms including, but not limited to, sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships, criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

- 6.3 Staff should report any concerns relating to the following specific safeguarding issues immediately to the DSL.

6.4 **Child on Child Abuse (including Harmful Sexual Behaviour, Sexual Violence and Sexual Harassment and Upskirting) (see [Annex 7](#))**

- 6.4.1 We recognise that children are vulnerable to physical, sexual and emotional abuse by their peers or siblings and that it can happen inside and outside of school or online. This can include, but is not limited to: bullying (including cyber bullying, prejudice-based and discriminatory bullying), abusive, harassing and misogynistic/misandrist messages, consensual and non-consensual sharing of nude and semi-nude images and/or videos including AI-generated intimate images which may include or be driven by misogyny/misandry (also known as sexting, indecent imagery or youth produced sexual imagery), sexual violence and sexual harassment (which may include misogyny/misandry), causing someone to engage in sexual activity without consent (e.g. forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party), initiation/hazing type violence and rituals, serious physical assault and harm or the threat of harm with a weapon. and physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
- 6.4.2 Child on child abuse also includes abuse within intimate partner relationships where abusive behaviour can take the form of physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional or other abuse.
- 6.4.3 It also includes upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This is a criminal offence.
- 6.4.4 Child on child abuse is a safeguarding issue for both the victim and the alleged perpetrator. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of a child who is suffering or likely to suffer significant harm; staff must never tolerate or dismiss concerns relating to child on child abuse and such abuse must never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys will be boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. We understand the importance of challenging inappropriate behaviours between children that are abusive in nature.
- 6.4.5 We will ensure, through training, that staff, volunteers and governors will have an understanding of the range of child on child abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise and challenge inappropriate behaviours between peers that are abusive in nature. We understand that even if there are no reports of this type of abuse, it does not mean it is not happening. Staff know that child on child abuse is preventable. Staff will be given the skills to identify and manage

harmful sexual behaviour using resources such as the [Brook Traffic Light Tool](#). Staff should be aware that it is more likely that girls will be victims and boys perpetrators, and that some groups are potentially more at risk, for example girls, children with SEND and LGBTQ children, but all child on child abuse is unacceptable and will be taken seriously.

- 6.4.6 Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our behaviour and anti-bullying policies.
- 6.4.7 Where a report is received regarding the sharing of nudes or semi-nudes, the DSL should refer to the DfE guidance on '[Sharing nudes and semi-nudes: advice for Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'. All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or not, require a safeguarding response with a proportionate approach that consider the age, development and circumstances of the children involved.
- 6.4.8 Where a child discloses safeguarding allegations of a sexual nature against another pupil in the same setting, the DSL should refer to the guidance on sexual violence and sexual harassment in [Annex 7](#). Where there is Children's Social Care or police involvement, the DSL should seek advice from these agencies before commencing their own investigation or contacting parents. This may mean, on occasions, that the school is unable to conduct its own investigation into such incidents. All such incidents will be recorded using MyConcern.
- 6.4.9 Reports of sexual violence or sexual harassment will be responded to in line with Part 5 of Keeping Children Safe in Education.
- 6.4.10 Support for the victims of abuse will be in line with support outlined in the school's behaviour and anti-bullying policies. For victims of sexual abuse, the School should follow advice given by Children's Social Care and consider using external agencies to support any strategies that they may be able to provide within school.
- 6.4.11 Depending on the nature of abuse, the School may need to consider providing measures to protect and support the victim, the alleged perpetrator(s), staff and/or other pupils in the school by means of a risk assessment (see Annex 9 for template). The risk assessment should be saved as part of the child's MyConcern records and kept under review.

6.5 Child Abduction and Community Safety Incidents

- 6.5.1 Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. It can be committed by parents, other family members, neighbours, friends, acquaintances or strangers.
- 6.5.2 Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents/carers, for example, people loitering nearby or unknown adults engaging children in conversation.
- 6.5.3 As children get older and are granted more independence, it is important they are given practical advice on how to keep themselves safe. Lessons should focus on building children's confidence and abilities, rather than simply warning them about strangers. Further information is available at www.actionagainstabduction.org and www.clevernevergoes.org

6.6 Children and the Court System

- 6.6.1 Children are sometimes required to give evidence in criminal courts for crimes committed against them or for crimes they have witnessed. Young witness guides are available to support children [aged 5-11](#) and [aged 12-17](#).
- 6.6.2 Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. The [child arrangements information tool](#) provides information on the dispute resolution service, which may be useful for some parents/carers.

6.7 Children with Family Members in Prison

- 6.7.1 These children are at risk of poor outcomes, including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information to support professionals working with these children, to help mitigate negative consequences for them.

6.8 Children who are Absent from Education

- 6.8.1 The School recognises that a child being absent from education, particularly on repeat occasions and/or for prolonged periods, is a potential indicator of abuse, neglect or exploitation. The procedures in this policy will be followed when dealing with children who are persistently absent or missing from education, particularly on repeat occasions, to help to identify the risk of abuse, neglect and exploitation, including mental health problems, female genital mutilation or forced marriage, sexual abuse or exploitation, risk of substance abuse, risk of travelling to conflict zones and child criminal exploitation including involvement in county lines, and to help prevent the risks of them going missing in the future.
- 6.8.2 Our procedures for dealing with children missing from education (CME) are based on local authority and local safeguarding partner procedures. Staff are made aware of these procedures at induction and through our attendance policy. We will make every attempt to obtain more than one emergency contact number for each child registered at the school to ensure we are able to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. See [Annex 4](#) for further information on CME.
- 6.8.3 The School shall inform the applicable local authority of any pupil who fails to attend the School regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).
- 6.8.4 Where a child is going to be added to or deleted from the pupil roll, the School will inform the local authority in which the child resides in the applicable circumstances. We will inform the local authority when removing a child from the pupil roll at non-standard transition points.

6.9 Child Criminal Exploitation (CCE)

- 6.9.1 CCE is a form of abuse where an individual or group (male or female, children or adults), takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity. It may involve an exchange for something the victim wants or needs and/or for the financial advantage or increased status of the perpetrator(s) or

facilitator(s) and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. The victim may have been criminally exploited even if the activity appears consensual. CCE can occur through the use of technology and does not always involve physical contact. The abuse may be a one-off occurrence or a series of incidents over time and can range from opportunistic to complex organised abuse. It can affect males and females and can include children who have been moved for the purpose of exploitation, commonly referred to as trafficking, and this may constitute modern slavery and potential victims should be referred (see section 6.17). Both boys and girls being criminally exploited may also be at higher risk of sexual exploitation.

- 6.9.2 CCE can involve children being forced or manipulated to work in cannabis factories, transport drugs or money across the country (see 6.9 for County Lines), shoplift or pickpocket, commit vehicle crime or threaten or commit serious violence to others. Children can become trapped by CCE as perpetrators can threaten them and their families.
- 6.9.3 Indicators of CCE include children who: appear with unexplained gifts or new possessions; associate with other young people involved in exploitation; suffer from changes in emotional wellbeing; misuse drugs and alcohol; have been the perpetrator or alleged perpetrator of serious violence, as well as the victim; or go missing from school or home and are subsequently found in areas away from their own. Children involved in CCE often commit crimes themselves and, as such, are not always recognised as vulnerable or as victims. They may still have been criminally exploited even if they appear to have consented or agreed to an activity.

6.10 County Lines

- 6.10.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs to other areas of the UK using dedicated mobile phone lines or other form of 'deal line'. This activity can also happen locally.
- 6.10.2 Exploitation is an integral part of the county lines offending model where offenders use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance. Typically, the gang exploits young or vulnerable people to move, store and/or sell drugs and money and secure the use of homes belonging to vulnerable adults. There is a crossover between CSE and county lines and young people are sometimes required to offer sex in order to pay off perceived debts.
- 6.10.3 Children can be targeted and recruited into county lines in a number of locations, including at school and increasingly online using social media, and can easily become trapped by this type of exploitation as gangs can create drug debts and threaten serious violence and kidnap towards victims and their families if they attempt to leave the county lines network. Concerns about young people being possibly involved should be passed to the DSL who will refer to police and Children's Social Care and may also consider other local services who offer support to victims of county lines exploitation.
- 6.10.4 A referral to the [National Referral Mechanism](#) should be considered if a child is suspected to have been trafficked for the purpose of transporting drugs. One of the ways of identifying this are missing episodes from both home and school.

6.11 Child Sexual Exploitation (CSE)

- 6.11.1 We recognise that CSE is a form of child sexual abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a child's physical and emotional health. Sexual exploitation involves an individual, group or organised network taking advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. This may involve physical contact or non-penetrative acts such as involving children in the production of sexual images, forcing children to look at or watch sexual images or activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Most sexual abuse is committed by those previously known to the victim. Victims can be boys or girls and can include children who have been moved for the purpose of exploitation, commonly referred to as trafficking, and this may constitute modern slavery and potential victims should be referred (see section 6.17). Children and young people are often unwittingly drawn into sexual exploitation through the offer of something they need or want, for example: friendship and care; gifts; drugs and alcohol; and sometimes accommodation. It can also be for the financial advantage or increased status of the perpetrator(s) or facilitator(s) and/or through the threat of violence. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact, it can also occur through the use of technology and it may also occur without the child or young person's immediate knowledge. The abuse may be a one-off occurrence or a series of incidents over time, and can range from opportunistic to complex organised abuse.
- 6.11.2 The School addresses the risks of sexual exploitation in the RSHE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.
- 6.11.3 All staff, volunteers and governors are made aware of the indicators of sexual exploitation, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual, and that it does not always involve physical contact but can occur through the use of technology. All concerns of CSE are reported immediately to the DSL.

6.12 Cybercrime

- 6.12.1 Cybercrime is criminal activity committed using computers and/or the Internet and includes cyber-enabled crimes such as fraud, buying illegal drugs online and CSE and cyber-dependent crimes such as unauthorised access to computers (illegal 'hacking'), Denial of Service (DoS or DDoS) attacks or 'booting' and making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.
- 6.12.2 Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cybercrime. If a concern relating to cybercrime is reported, the DSL should consider a referral to the Cyber Choices programme.

6.13 Domestic Abuse

- 6.13.1 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/or emotional abuse. It includes intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

6.13.2 Children and young people can be victims of domestic abuse in their home life, including in the context of seeing, hearing or experiencing the effects of domestic abuse occurring between other family members, but also within their own intimate personal relationships. We recognise that 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. We will ensure that our pupils are educated so that they understand what a healthy relationship looks like. All concerns regarding domestic abuse will be reported to the DSL, who will ensure that appropriate support is available to the child/children and make referrals to Children's Social Care where the threshold for social care intervention is met.

6.13.3 Our School receives Operation Encompass notifications. Operation Encompass highlights that a domestic abuse incident has taken place where there are children in the household and that the police have been called or have visited the family home. It ensures our staff to have up to date and relevant information about the child's circumstances and enables support to be given according to need. Further information on Operation Encompass and how schools will use the notifications is available from the DSL.

6.14 **Homelessness**

6.14.1 Being homeless or at risk of becoming homeless presents a real risk to a child's welfare. The DSL should be aware of contact details and referral routes into their Local Housing Authority so they can raise or progress concerns at the earliest opportunity. The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness has access to meaningful help, including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. Any such referral should not replace a referral to Children's Social Care where a child has been harmed or is at risk of harm.

6.14.2 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. In most cases, School staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should be recognised that in some cases 16 and 17 year olds could be living independently from their parents or guardians and will require a different level of intervention and support. Children's Social Care should be the lead agency for these young people.

6.15 **'Honour Based' Abuse (HBA) (see Annex 6)**

6.15.1 So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. 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 HBA are abuse, regardless of the motivation, and should be handled and escalated as such.

- 6.15.2 We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of FGM and other forms of HBA and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child who has suffered or might be at risk of HBA they should inform the DSL who will activate local safeguarding partner procedures, using existing national and local protocols for multiagency liaison with police and Children's Social Care.
- 6.15.3 Where FGM has taken place, since 31st October 2015 there has been a mandatory reporting duty placed on teachers or other persons employed or engaged to carry out teaching work. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: '[Mandatory Reporting of Female Genital Mutilation - procedural information](#)' (October 2015). See Annex 6 for further information.
- 6.15.4 Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts using hard or heated objects to try to stop them developing, or to make them disappear entirely. Much like FGM, breast ironing is a harmful cultural practice and while there is no specific law within the UK around breast ironing, it is a form of physical abuse. If staff are concerned that a child may be at risk of, or is suffering, significant harm, they should inform the DSL.
- 6.15.5 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. Forced marriage is a crime in England and if staff are concerned that a child may be at risk of or have been forced into a marriage, they should inform the DSL. In addition, it is also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence or threats or other forms of coercion are not used. This applies to non-binding or unofficial marriages, as well as legal marriages. The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or via fmfu@fco.gov.uk

6.16 Mental Health

- 6.16.1 We aim to help prevent mental health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing. Please refer to the Tudor Grange Academies Trust Mental Health policy for further information on our approach to promoting positive mental health and responding to mental ill health.
- 6.16.2 We recognise that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We also recognise that mental health problems can, in some cases, develop into safeguarding concerns, including self-harm, eating disorders, suicidal ideation or risk of suicide. Staff are well-placed to observe children day-to-day and identify those whose behaviour suggests they may be experiencing, or be at risk of developing, a mental health problem. Potential warning signs may include significant changes in behaviour, ongoing difficulty sleeping, withdrawal from social situations, not wanting to do things they usually like, and physical signs of self-harm or neglecting themselves. However, only appropriately trained professionals should attempt to make a diagnosis.

- 6.16.3 Where children have suffered abuse, neglect and exploitation or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood and adolescence and into adulthood. We are aware of how these ACEs can impact on a child's behaviour and attendance, and that these children have a high prevalence of mental health and/or special educational needs.
- 6.16.4 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the reporting procedures outlined in this policy.

6.17 Modern Slavery

- 6.17.1 The Modern Slavery Act 2015 places a statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority, including schools, bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents/carers or their children may be victims of modern slavery. The DSL will then contact the NCA.
- 6.17.2 Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can also take the form of sexual exploitation, forced criminality and the removal of organs.
- 6.17.3 The [National Referral Mechanism](#) is a framework for identifying victims of human trafficking and ensuring they receive the appropriate protection and support.

6.18 Radicalisation and Extremism (see [Annex 5](#))

- 6.18.1 We are subject to the Prevent Duty under section 26 of the Counter-Terrorism and Security Act 2015, which requires us to identify children who may be susceptible to radicalisation into terrorism and know what to do when they are identified. We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.
- 6.18.2 The DSL has received Prevent training and will act as the point of contact within our School for any concerns relating to radicalisation and extremism. The DSL will make referrals in accordance with local safeguarding partner procedures and will represent the School at Channel meetings as required.
- 6.18.3 If a staff member, governor or volunteer becomes concerned about a child in relation to radicalisation or extremism, they will follow the procedures set out in [Annex 5](#) of this document.
- 6.18.4 All staff, trainee teachers, governors, supply staff and volunteers will be given training in respect of having an understanding of what radicalisation and extremism are, why we need to be vigilant in school, and identifying and reporting concerns about a child and their individual obligations under the Prevent duty.
- 6.18.5 We aim to help provide resilience to radicalisation by encouraging pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the School and where

political issues are brought to the attention of the pupils, reasonably practicable steps have been taken to offer a balanced presentation of opposing views to pupils.

- 6.18.6 We value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 6.18.7 We seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, extreme political ideologies, Irish nationalist and loyalist paramilitary groups, religious or ethnic superiority, misogyny and incels, anti-LGBT, and extremist Animal Rights movements.
- 6.18.8 There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- 6.18.9 We will use relevant information, tools and resources to help staff and parents/carers recognise and address extremism and radicalisation in young people, for example the [Educate Against Hate](#) website.

6.19 Serious Violence

- 6.19.1 Serious violence is a continuing safeguarding concern that may involve physical assault, carrying, threatening with or using weapons, and can be associated with criminal exploitation. The DSL should assess the risk to the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Early, evidence-based support for those at risk and at critical points is vital. This should include access to trusted adults, social and emotional skill support and targeted interventions. It may also be relevant to put in place a safety and support plan, and consider action to de-escalate peer conflict.
- 6.19.2 Staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These 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, or 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.
- 6.19.3 Staff should be aware of the risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent, suspended or permanently excluded from school, having had time in alternative provision, having experienced child maltreatment and having been involved in offending, such as theft or robbery. School will also try to be alert to when children might be at highest risk, for example immediately after school. Advice is provided in the Home Office's [Preventing Youth Violence and Gang Involvement](#) and [Criminal Exploitation of Children and Vulnerable Adults: County Lines](#).

6.20 Local issues

- 6.20.1 Within our local area, statistics show that violent crime and shoplifting are the two most commonly committed crimes and therefore are a particular focus for our School (data taken from www.crime-statistics.co.uk, July 2026).
- 6.20.2 The local safeguarding risks for our school are child's welfare and wellbeing, followed by parenting capacity/concern – we address and minimise these risks by:
- Working with external agencies to support families – WEST team
 - An established Thrive programme to support children in school.
 - A strong, positive culture of belonging and empowerment in school based around our ABC values, Ambitious, Brave and Caring.

7 Looked After Children, Previously Looked After Children and Children in Kinship Care

- 7.1 The most common reason for children becoming looked after is as a result of abuse or neglect. The School ensures that staff have the necessary skills, knowledge and understanding to keep Looked After Children (LAC) safe. Appropriate staff have information about a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. They also have information about the child's care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The Designated Teacher for Looked After Children and the DSL have details of the child's social worker and the name and contact details of the local authority's Virtual Head for children in care, previously looked after children and children in kinship care.
- 7.2 The School's Designated Teacher for Looked After Children, Previously Looked After Children and Children in Kinship Care has the appropriate training and experience of working with this group of children.
- 7.3 We recognise that a previously looked after child potentially remains vulnerable and therefore ensure that staff have the skills, knowledge and understanding to keep previously looked after children safe.
- 7.4 The Designated Teacher and the DSL will obtain details of the local authority Personal Adviser appointed to guide and support each care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

8 Private Fostering Arrangements

- 8.1 A private fostering arrangement occurs when someone other than a parent of a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.
- 8.2 Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.
- 8.3 Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

- 8.4 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible.
- 8.5 If we become aware of a private fostering arrangement, we will check that Children's Social Care have been informed.

9 Special Educational Needs and Disability (SEND) and Physical Health Issues

- 9.1 We recognise that children with Special Educational Needs and Disabilities or certain medical or physical health issues can face additional safeguarding challenges, both online and offline, and these are discussed in staff training. These additional barriers can include:
 - 9.1.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - 9.1.2 being more prone to peer group isolation or bullying than other children;
 - 9.1.3 children with SEND or certain medical conditions can be disproportionately impacted by behaviours such as bullying without outwardly showing any signs;
 - 9.1.4 communication barriers and difficulties in overcoming these barriers;
 - 9.1.5 the need for intimate care and that children with SEND are more likely to be dependent on adults for care;
 - 9.1.6 cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content or behaviours in school and being unable to understand the consequences of doing so, and the risk that they do not understand that what is happening to them is abuse.
- 9.2 We will always consider extra pastoral support for children with SEND to address these additional challenges. Any reports of abuse, neglect or exploitation involving children with SEND will require close liaison with the SENCo, as well as the DSL.

10 Anti-Bullying and Prejudice-Based Incidents

- 10.1 Our policy on anti-bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including cyber-bullying, racist, homophobic and gender related bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in school.
- 10.2 We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to Children's Social Care or to the police.
- 10.3 Our policy on racist incidents is set out in our anti-bullying policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We maintain a log of racist incidents in school.
- 10.4 The fact that a child or young person may be lesbian, gay, bi or trans (LGBT) is not in itself an inherent risk factor for harm. However, children who are or are perceived by other children to be LGBT can be targeted by other children and can therefore be more vulnerable. Risks can be compounded when there is no trusted adult with whom they can be open and it is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for LGBT children to speak out and share concerns.

- 10.5 We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment. We will take a strong, proactive stance on all forms of bullying based on gender and appropriately sanction any cases of bullying or harassment, whilst being conscious of the rights of pupils and staff in relation to their religion or belief. See section 11 for further information on pupils who are questioning their gender.
- 10.6 The DSL understands the unique risks associated with online safety and has the relevant knowledge and up to date capability required to keep children safe whilst they are online at school and at home.
- 10.7 The DSL is able to recognise the additional risks that children with special educational needs and disabilities face online, for example from online bullying, grooming and radicalisation, and has the capability to support children with SEND to stay safe online.
- 10.8 All members of staff are trained in and receive regular updates in online safety and recognising and reporting concerns.
- 10.9 Our acceptable use policy, included in our online safety policy which is available on our website, recognises that internet safety is a whole school responsibility (staff, pupils, parents/carers, and governors).
- 10.10 In line with '*Keeping Children Safe in Education*', we proactively monitor pupils' internet use. This requires safeguarding teams across the Trust to access websites that pupils are attempting to access and therefore unrestricted internet access is needed for certain staff. Internal logs of all staff internet access are still maintained.
- 10.11 Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies.
- 10.12 Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal. For example, children with advanced computing or coding skills are vulnerable to becoming involved in cybercrime, often with complete ignorance of offences under the Computer Misuse Act.
- 10.13 We therefore recognise our responsibility to educate our pupils, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.
- 10.14 We will ensure that filters are in place to prevent access to unsuitable sites and we will monitor the use of the School network and internet to ensure that any pupil or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported.
- 10.15 We are aware of government advice on children learning online at home and have produced separate guidance for staff, pupils and parents/carers on participating in live online teaching sessions.
- 10.16 We will undertake an annual review and risk assessment of our approach to online safety to ensure that it continues to be appropriate in light of the constant evolution in technology and the risks and harms related to it.
- 10.17 The School provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

11 Pupils who are questioning their gender

- 11.1 Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority, unless this might put the pupils at greater risk than not involving them. In these cases, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken. Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.
- 11.2 The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that changes are made or support put in place to facilitate the pupil presenting as the opposite biological sex (known as social transition), we will work with parents/carers to determine what is in the best interests of the child and other children. Staff will not adopt any changes relating to social transition unless a decision has been made by the school and parents/carers have been involved.
- 11.3 In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. Decisions will be made in line with the following principles:
- 11.4 Statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- 11.5 Parents/carers should be actively involved and their views treated with importance and properly considered, except in circumstances where this would constitute a greater risk
- 11.6 Accommodating social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes, and so a very careful approach will be taken
- 11.7 The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The decision-making process will be documented and records kept. The circumstances and needs of a child may change over time, and therefore decisions may need to be reviewed and the DSL will be involved with this.
- 11.8 Pupils are not allowed into toilets, changing rooms or showers designated for the opposite biological sex, with no exceptions.
- 11.9 The school may teach and play some sports, games or activities of a competitive nature in single-sex groups, where the physical strength, stamina or physique of the average girl would put her at a disadvantage compared to the average boy, or vice versa. The school can separate children according to their biological sex in these circumstances.

12 Photography and Use of Images (including handheld devices)

- 12.1 The welfare and protection of our children is paramount and consideration should always be given to whether the use of photography will place our children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.

- 12.2 For this reason, consent is always sought when photographing children using any means and including iPads or other tablets, smart phones or cameras, and additional consideration given to photographing vulnerable children, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the local authority in the case of Looked After Children).
- 12.3 Parents, carers and other spectators are requested not to take personal photographs or videos at school events, including school plays, music concerts, sports days and sports matches. Where appropriate, staff will issue a verbal reminder of this at the start of the event. The school may take photographs or videos using school equipment, which can then be made available to parents/carers, having ensured that consent has been sought before taking and using any images. This is to safeguard all the children in our schools and ensure that we operate within the guidance that seeks to protect children in England, particularly around potential risks associated with sharing images of children online.
- 12.4 Many pupils own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

13 Online Safety and Use of Mobile Technology

- 13.1 We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
- 13.2 Our Online Safety policy sets out the processes in place to ensure the online safety of pupils and staff, and how we educate the school community in its safe and responsible use of technology, including mobile and smart technology such as mobile phones, and artificial intelligence (AI) and recognising deepfakes. This includes:
 - 13.2.1 educating pupils about online safety as part of their curriculum;
 - 13.2.2 training staff on safe internet use and online safeguarding issues as part of their induction and at least once every academic year as part of safeguarding refresher training;
 - 13.2.3 educating parents/carers about online safety via our website, communications sent directly to them, and during parent information evenings;
 - 13.2.4 providing a robust filtering and monitoring system to limit children's exposure to risk. Safeguarding teams receive daily filtering and monitoring reports detailing any concerning online activity detected on school devices and networks and follow up issues swiftly. However, we ensure that 'over blocking' does not lead to unreasonable restrictions as to what pupils can be taught about online;
 - 13.2.5 ensuring that school is a mobile phone-free environment (see TGAT Behaviour Policy for further information). The sending of abusive or inappropriate text, picture or video messages is forbidden and will be reported and addressed in line with this policy and/or our Anti-Bullying policy;
 - 13.2.6 making sure staff are aware of restrictions placed on them with regards to the use of their mobile devices, as outlined in our Adult Code of Conduct;
 - 13.2.7 implementing Acceptable Use Agreements for pupils, staff and volunteers;
 - 13.2.8 carrying out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

14 Restrictive Interventions, including the use of reasonable force (Safer Handling)

- 14.1 Our policy on the use of restrictive interventions is included in the Trust Behaviour Policy. Where use of reasonable force is required, Safer Handling protocols are followed.
- 14.2 Our policy on the safer handling of pupils is set out in Annex 8 of this policy and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimum force necessary to prevent injury or damage to property.
- 14.3 We acknowledge that when applying reasonable force in response to risks presented by incidents involving children with special educational needs or disabilities or with medical conditions, it is important to recognise their additional vulnerability and make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.
- 14.4 We understand that physical intervention of a nature that causes injury or distress to a child may be considered under management of allegations or disciplinary procedures.
- 14.5 Staff who are likely to need to use physical intervention will be appropriately trained in Safer Handling methods, or equivalent. Each School maintains a list of staff who have completed this training.
- 14.6 All incidences of physical intervention will be recorded in accordance with Safer Handling recommended procedures.
- 14.7 We recognise that touch is appropriate in the context of working with children and all staff have been given 'safer working practice' guidance to ensure they are clear about their professional boundaries. We recognise that the adoption of a 'no contact' policy could leave staff unable to fully support and protect our pupils.
- 14.8 Any member of staff may use reasonable force as a first resort where it is necessary and proportionate to the circumstances to prevent a greater harm or greater perceived harm from occurring.

15 Supporting Children who are Abused, Neglected or Exploited

- 15.1 We recognise that children who are abused, neglected or exploited, or who witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame.
- 15.2 We understand that some children may need a social worker due to abuse, neglect and complex family circumstances and that their experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged from barriers to attendance, learning, behaviour and mental health. The DSL will use information shared by the local authority to make decisions in the best interests of the child's safety, welfare and educational outcomes and to inform decisions about safeguarding and promoting welfare. .
- 15.3 We acknowledge that the School may be the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm.
- 15.4 We are aware that research shows that at the School their behaviour may be challenging and defiant or they may be withdrawn.
- 15.5 The School will endeavour to support all children by:
 - 15.5.1 encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying and humiliating behaviour;

- 15.5.2 promoting a positive, supportive and secure environment giving pupils a sense of being valued;
- 15.5.3 a consistently applied behaviour policy, available on our website, which is aimed at supporting vulnerable pupils. The School will ensure that the pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;
- 15.5.4 liaising with other agencies that support the pupil such as Children's Social Care Services, Child and Adult Mental Health Service (CAMHS), Educational Psychology Service and those agencies involved in the safeguarding of children;
- 15.5.5 the use of universal services and community-based Early Help or the targeted early help level of Family Help, or local equivalent services, when appropriate;
- 15.5.6 notifying Children's Social Care immediately when there is a significant concern;
- 15.5.7 providing continuing support to a child about whom there have been concerns who leaves the School by ensuring that appropriate information is forwarded under confidential cover to the child's new setting.

16 Supporting and Supervision of Staff

- 16.1 We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
- 16.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as counselling or supervision, as appropriate.
- 16.3 We will enable termly supervision for the DSL and their safeguarding teams with an external safeguarding consultant, in order to promote best practice and support the mental health and wellbeing of staff.
- 16.4 In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

17 Safer Recruitment and Selection of Staff

- 17.1 The School has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The following statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs:

The recruitment process is robust in seeking to establish the commitment of candidates to support the school's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.

- 17.2 References are requested and scrutinised for all candidates prior to interview and any discrepancies or concerns are raised and discussed during interview, including for any volunteers and internal candidates. References are always requested directly from the referee and verified as being from a senior person with appropriate authority and electronic references are checked to ensure they originate from a legitimate source. Where specific questions have not been answered satisfactorily or insufficient evidence is provided, the referee will be contacted directly for further clarification. Where references are not

forthcoming, despite reminders, the candidate will be asked to provide an alternative referee.

- 17.3 All staff working within our School who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced DBS check, online check and right to work in the UK check. Staff who have lived or worked outside the UK will also be subject to further checks to consider any relevant events that occurred in a different country.
- 17.4 All teachers working within our School have been checked using the Teacher Services website to ensure they have been awarded QTS, they have completed their teacher induction and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions, e.g. management posts.
- 17.5 The School seeks written assurance from supply and third-party agencies, alternative providers, initial teacher training providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with our pupils. All contracted staff also receive a copy of this safeguarding policy and the Staff Code of Conduct.
- 17.6 Our governors are subject to an enhanced DBS check without barred list check and have been checked to ensure they are not disqualified from holding office under a section 128 direction.
- 17.7 The School maintains a single central record of recruitment checks for audit purposes.
- 17.8 Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.
- 17.9 Volunteers who are not working in regulated activity will be supervised at all times. A risk assessment will be undertaken to evidence where a volunteer is in regulated activity and therefore where an enhanced DBS check, with barred list check, is required (see Annex 10 for risk assessment template).
- 17.10 Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare such relevant information – see statutory guidance: [Disqualification under the Childcare Act 2006](#).

18 Whistleblowing

- 18.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 18.2 All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the School's confidential whistleblowing policy. Concerns about an adult working at the school should be logged on Confide, unless it pertains to the Principal.
- 18.3 Whistleblowing concerns about the Principal should be logged on the Trust version of Confide (not the school's version), and/or raised with the Chair of the Local Governing Body or Director of Standards.

- 18.4 Staff will be made aware that if they feel unable to raise a Child Protection failure internally, they can contact the NSPCC 'What you can do to report abuse' dedicated helpline on 0800 028 0285 or email help@nspcc.org.uk

19 Complaints or Concerns expressed by Pupils, Parents, Staff, Supply Staff or Volunteers

- 19.1 We recognise that listening to children is an important and essential part of safeguarding them against abuse, neglect and exploitation. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard their welfare.
- 19.2 We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the School will take but also the length of time that will be required to resolve the complaint. The School will also endeavour to keep the child or adult regularly informed as to the progress of their complaint. The School's complaints procedures are readily available on the school website.

20 Health & Safety

- 20.1 Our health & safety policy, set out in a separate document, reflects the consideration we give to the safeguarding of our children both within the school environment and when away from the school, for example when undertaking school trips and visits.
- 20.2 Risk assessments are undertaken and reviewed regularly, in respect of site security, risk of children becoming terrorists or supporting terrorism or exposed to extremist behaviour, and risk to and from children displaying harmful behaviour. The School undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.
- 20.3 The School has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours. This includes services or activities provided by external bodies, where the School seeks assurance that the provider has appropriate safeguarding and child protection policies and procedures in place, regardless of whether the children who attend these services or activities are pupils on roll at the School.
- 20.4 Visitors to the School, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material. See Annex 11 for the School's checking procedure.

21 Challenge and Escalation

- 21.1 We recognise that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children.
- 21.2 As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.
- 21.3 We are aware of the local safeguarding partners escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

22 Monitoring and Evaluation

22.1 Our safeguarding children policy and procedures will be monitored and evaluated by:

- 22.1.1 completion of the annual safeguarding audit;
- 22.1.2 pupil surveys and questionnaires;
- 22.1.3 discussions with children and staff;
- 22.1.4 scrutiny of data and risk assessments;
- 22.1.5 scrutiny of the School's single central record of recruitment checks;
- 22.1.6 scrutiny of Governing Body and EPC minutes;
- 22.1.7 monitoring of logs of bullying/racist/behaviour incidents and Safer Handling records;
- 22.1.8 supervision of staff involved in child protection;
- 22.1.9 case file audits.

23 Other Relevant Policies

23.1 The Trust's statutory responsibility for safeguarding the welfare of children goes beyond basic child protection procedures.

23.2 The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, including:

- Abuse Allegations Procedures;
- Anti-Bullying Policy;
- Behaviour Policy;
- Complaints Procedure;
- Equality, Diversity and Inclusion Policy;
- Online Safety Policy;
- First Aid Policy;
- Health and Safety Policy;
- Educational Visits Policy;
- Relationships Education, Relationships and Sex Education (RSE) and Health Education Policy;
- SEND Policy;
- Adult Code of Conduct;
- Supporting pupils with Medical Conditions Policy;
- Whistleblowing Policy and Procedure;
- Recruitment and Selection Policy and Procedure.

23.3 The above list is not exhaustive, but when undertaking development or planning of any kind the School will need to consider safeguarding matters.

24 Key contacts

24.1 Internal

Designated Safeguarding Lead for Child Protection:	Oliver Norman
Deputy Designated Safeguarding Lead(s):	Claire Evans, Lucy Brooks
Chair of Governors:	Rebecca Widowson

24.2 External

Children's Social Care:	(Professional number)	01905 822666
	(Public number)	01905 822666

Out of Hours Emergency Duty Team:	01905 768020
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Police Public Protection Unit:	
24hrs non-emergency	101
Emergency	999

National Police Chief's Council [‘When To Call The Police’](#)

Local Authority Education Adviser:	Denise Hannibal - 01905 844436
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Local Authority Designated Officer (LADO):	John Hancock – 01905 843311
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NSPCC Helpline:	0808 800 5000 help@nspcc.org.uk
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NSPCC ‘What you can do to report abuse’ dedicated helpline:	0800 028 0285
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Childline:	0800 1111
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Child Exploitation and Online Protection command (CEOP):	
	www.ceop.police.uk/safety-centre

UK Safer Internet Centre:	0344 381 4772 helpline@saferinternet.org.uk
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Forced Marriage Unit	fm@fcdo.gov.uk 020 7008 0151 020 7008 1500 (emergency out of hours)
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National Domestic Abuse Helpline:	0800 2000 247
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Operation Encompass Teacher's Helpline (8am to 1pm):	0204 513 9990
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Ofsted:	0300 123 1231
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24.3 Channel/Prevent contacts

Local Authority:	Paul Kinsella 01905 846550
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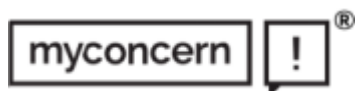
Police:

West Mercia Police 0300 333 3000

Annexe 1 Managing a disclosure – Practical Information

Teachers and other staff in academies are in a unique position to observe children's behaviour over time and often develop close and trusting relationships with pupils. If a child discloses directly to a member of staff, the following procedures will be followed:

- listen carefully to what is said;
- ask only open questions such as:
 - 'Tell me what happened.'
 - 'Please explain what you mean when you say
 - 'Can you describe the person?' or 'Can you describe the place?'
- do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your Dad hit you?';
- do not force the child to repeat what he/she said in front of another person;
- do not begin an investigation – for example by asking the child to record what happened in writing or taking a photograph of any injuries; and
- report immediately to the DSL and complete a written record as soon after the disclosure as possible and in any case within 24 hours, using the child's words as far as possible. Use body maps to record any observed injuries.



Report a Concern

Name(s) of Pupil(s)

Concern Summary (Briefly summarise the concern/incident, naming the Pupil(s) involved.)

Concern Date/Time (Please enter the date/time when the concern/incident first came to your notice.)

Details of Concern (If required, you can add more detail about the concern/incident, giving times, dates, location, who was present and a Pupil's actual words if relevant.)

Location of Incident (where applicable)

Is this urgent?

☐

If YES, please check this box.

If your concern is urgent you may also wish to consider contacting the DSL personally.

N.B. IF, AT ANY POINT, THERE IS A RISK OF IMMEDIATE SERIOUS HARM TO A PUPIL YOU MUST PERSONALLY INFORM THE DSL IMMEDIATELY.

Action taken (Please describe any action(s) you have taken, or plan to take, in relation to this concern.)

Name of staff reporting concern

Signature and date



Report a Concern

Name(s) of Person(s)

Concern Summary (Describe the type of concern/incident.)

Concern Date/Time (Please enter the date/time when the concern/incident first came to your notice.)

Origin of Concern (Where applicable, e.g. general public, church, police, other.)

Details of Concern (If required, you can add more detail about the concern/incident, giving times, dates, location, who was present and a Person's actual words if relevant.)

Location of Incident (Please enter the location of the incident, where applicable.)

Action taken (Please describe any action(s) you have taken, or plan to take, in relation to this concern.)

Please attach any further information that is relevant to this concern and pass to the Principal.

Name of staff reporting concern

Signature and date

Annexe 4 Children Missing Education

As a member of staff at the school you are asked to stay vigilant about any child who is or could potentially become missing from education. Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities, including abuse, neglect, mental health problems, child sexual exploitation, female genital mutilation, etc.

Staff may overhear discussions amongst pupils about planned absence or the whereabouts of other pupils who are absent. The context of the discussion could include:

- going on holiday to an unusual or potentially dangerous destination
- the route that will be taken to reach the destination
- going on holiday and parents are going to call them in sick
- homes being packed up to move
- moving home and not knowing where to
- the whereabouts of a child who is not in school
- why a child is regularly absent from school

You must report any concerns to the appropriate member(s) of staff, who will address the concern through the school's safeguarding procedures.

- Safeguarding team through MyConcern
- College Leader / Principal
- Attendance Welfare Officer

Do not assume that the matter is being addressed or leave it to another person to pass on the information.

Once the information has been received, the relevant staff will start making appropriate enquiries to ensure the pupil(s) are safe and well.

- Telephone calls home
- Text messages
- Emails
- Home visits
- Contacting relatives
- Police safe and well checks

If there is no acceptable conclusion to the investigations, the matter is referred to the appropriate external agencies.

After 10 continuous school days of unauthorised absence the school has to notify the local authority's children missing education team.

Annexe 5 Radicalisation and Extremism

Preventing Radicalisation

Children are susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a school's safeguarding approach.

Extremism is the promotion or advancement of an ideology 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 aforementioned results.

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

What is Prevent?

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, **in all its forms**. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including schools and colleges, to have due regard to the need to prevent people from becoming terrorists or supporting terrorism ("the Prevent duty"). The Prevent duty reinforces existing duties placed upon educational establishments for keeping children safe by:

- ensuring a broad and balanced curriculum is in place schools to promote the spiritual, moral, social and cultural development of pupils;
- assessing the risk of pupils being drawn into extremist views;
- ensuring safeguarding arrangements by working in partnership with local authorities, police and communities;
- training staff to provide them with the knowledge and ability to identify pupils at risk;
- keeping pupils safe online, using effective filtering and usage policies.

What is Channel?

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to becoming terrorists or supporting terrorism. Prevent referrals may be passed to a multi-agency Channel Panel, who will discuss the individual referred to determine whether they are vulnerable to becoming a terrorist or supporting terrorism and consider the appropriate support required. A representative from school may be asked to attend the Channel Panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at [Channel Guidance](#).

Managing Risk

There is no single route to radicalisation. DSLs should consider an individual's behaviour in the context of wider influencing factors and vulnerabilities, as well as protective factors to make a

comprehensive assessment of risk and harm. The DfE's [*Managing Risk of radicalisation in your education*](#) setting will be referred to in order to support the management of any risk.

Referral Process

All concerns about young people vulnerable to radicalisation should be referred to the DSL in the first instance. The DSL will follow safeguarding procedures to gather information and determine if further action is required. This may include:

- talking to the young person about their behaviour/views/on-line activity/friends etc;
- discussion with parents/carers about the concerns;
- checking out on-line activity, including social media if possible;
- providing in-house support, if available;
- providing Early Help targeted support if necessary.

If concerns persist, then the DSL should follow their local safeguarding partners local procedures in relation to referrals to the Channel Panel. Further information can be found at: [*Worcestershire Prevent*](#)

Annexe 6 Female Genital Mutilation (FGM)

What is FGM?

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

Type 1 – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)

Type 2 – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the ‘lips’ that surround the vagina)

Type 3 – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris

Type 4 – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as ‘female genital cutting’ or female circumcision. Communities tend to use local names for this practice, including ‘sunna’.

Why is FGM carried out?

It is believed that:

- it brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage;
- it preserves a girl’s virginity/chastity;
- it is part of being a woman as a rite of passage;
- it upholds the family honour;
- it cleanses and purifies the girl;
- it gives the girl and her family a sense of belonging to the community;
- it fulfils a religious requirement believed to exist;
- it perpetuates a custom/tradition;
- it helps girls and women to be clean and hygienic;
- it is cosmetically desirable;
- it is mistakenly believed to make childbirth safer for the infant.

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them ‘a better Muslim’. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

Within which communities is FGM known to be practised?

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM.

UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

Is FGM harmful?

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night.

Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

Is it illegal?

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004:

The act makes it illegal to:

- practise FGM in the UK;
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country;
- aid and abet, counsel or procure the carrying out of FGM abroad.

The offence carries a penalty of up to 14 years in prison, and/or a fine.

Signs, symptoms and indicators

The following list of possible signs and indicators are not diagnostic, but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- a child talking about getting ready for a special ceremony;
- a family arranging a long break abroad;
- a child's family being from one of the 'at-risk' communities for FGM (see above);
- knowledge that an older sibling has undergone FGM;
- a young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a child has undergone FGM:

- prolonged absence from school or other activities;
- behaviour change on return from a holiday abroad, such as the child being withdrawn and appearing subdued;
- bladder or menstrual problems;
- finding it difficult to sit still, and looking uncomfortable;
- complaining about pain between their legs;
- mentioning something somebody did to them that they are not allowed to talk about;
- secretive behaviour, including isolating themselves from the group;
- reluctance to take part in physical activity;
- repeated urinal tract infection;
- disclosure.

Mandatory Reporting Duty

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Further information on when and how to make a report can be found in the following Home Office guidance: '[Mandatory Reporting of Female Genital Mutilation - procedural information](#)' (October 2015).

What is breast ironing?

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.

Why does breast ironing happen?

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

Breast ironing is physical abuse

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

Breast Ironing in the UK

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. *Keeping Children Safe in Education* mentions breast ironing, as part of the section on so-called 'honour-based' abuse. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

What should schools do?

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a Child Protection referral and inform the Police as required by the mandatory reporting duty. Schools should not:

- contact the parents before seeking advice from Children's Social Care;
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM or Breast Ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

The 'one chance' rule

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance' of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

Annexe 7 Harmful Sexual Behaviour, Sexual Violence and Sexual Harassment Guidance

The school will respond to all signs, reports and concerns of harmful sexual behaviour, child on child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises or online.

Sexual violence refers to sexual offences under the Sexual Offences Act 2003: rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent, as defined by the Sexual Offences Act 2003.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

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 is defined as “unwanted conduct of a sexual nature” and can include sexual comments such as telling sexual stories or making lewd comments or sexual remarks about clothes and appearance and calling someone sexualised names, sexual jokes or taunting, physical behaviour (which may sometimes cross the line into sexual violence) such as grabbing bottoms, breasts and genitalia or pulling down trousers or flicking bras and lifting up skirts, deliberately brushing against someone or interfering with their clothes or displaying drawings or images of a sexual nature, online sexual harassment such as consensual and non-consensual sharing of nude and semi-nude images and/or videos, sharing of unwanted explicit content, sexualised online bullying, unwanted sexual messages and comments, sexual exploitation, coercion and threats and upskirting. Upskirting is a criminal offence under the Voyeurism (Offences) Act 2019.

The School offers age-appropriate guidance to pupils through the curriculum, with a view to educating pupils about appropriate behaviour and consent and minimising and preventing the occurrence of incidents of sexual violence and sexual harassment. This includes guidance on protective behaviours, healthy relationships, consent, sex education and how to report concerns about themselves or their peers.

It is important to note that:

- harmful sexual behaviour can occur between two children of any age and sex or through a group of children sexually assaulting or sexually harassing a single child or group of children;
- incidents and behaviours related to sexual violence and sexual harassment can be associated with factors outside of school and staff should consider whether children are at risk of abuse or exploitation in situations outside their families;
- harmful sexual behaviour:
 - exist on a continuum and may overlap;
 - can occur online and/or face to face (both physical and verbal) and technology is a significant component in many cases;
 - are never acceptable.

- all victims must be taken seriously and offered appropriate support, regardless of how long it has taken them to come forward or whether it is abuse that has occurred online or offline;
- it is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys, however all child on child abuse is unacceptable and should be taken seriously. Children who are lesbian, gay, bisexual or trans (LGBT), or perceived to be so, may also be particularly targeted by their peers;
- there is a **zero tolerance** approach to sexual violence and sexual harassment and it should be made clear that it is not "part of growing up", "banter", "just having a laugh" or "boys being boys" and this behaviour is **always unacceptable** and should not be dismissed or tolerated as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils;
- children with special educational needs (SEN) and disabilities are more vulnerable to sexual violence and harassment and additional barriers can exist when recognising abuse in these children;
- children may not find it easy to tell staff about their abuse verbally, but may show signs or act in ways that they hope adults will notice and react to;
- children may not make a direct report; staff may overhear a conversation that suggests a child has been harmed or a friend may make a report;
- certain children may face additional barriers to telling someone about abuse because of their vulnerability, disability, sex, ethnicity or sexual orientation;
- whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- where the report includes an online element, staff must never view or forward illegal images of a child;
- an initial disclosure may only be the first incident reported, rather than representative of a singular incident, as trauma can impact memory and therefore children may not be able to recall all details or an accurate timeline of abuse;
- all staff should maintain an attitude of 'it could happen here', challenge inappropriate behaviours between peers (even if it appears to be relatively innocuous) and be aware that even if there are no reports of this type of abuse, it does not mean it is not happening.

Responding to reports of sexual violence or 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 existing safeguarding reporting procedures should be followed with regard to incidents of sexual violence and sexual harassment, including those that have happened outside of school or online. The initial response to a report from a child is incredibly important and can encourage or undermine the confidence of future victims to come forward. Staff should act on any concerns immediately and the victim should be reassured that they are being taken seriously and that they will be supported and kept safe, as well as never being given the impression that they are creating a problem by reporting sexual violence or harassment or being made to feel ashamed for making a report.

Throughout the management of the incident and into the future, the needs and wishes of the victim are paramount. The alleged perpetrator(s) should also be safeguarded, supported and educated. They are likely to experience stress as a result of being the subject of allegations. Sanctions can occur at the same time. Ideally, two adults should be present, one of whom will preferably be the DSL or a Deputy DSL.

As with any safeguarding concern, confidentiality should not be promised. Parents or carers should normally be informed, unless this would put the victim at greater risk and, as a basic safeguarding principle. A referral should be made to Children's Social Care if a child is at risk of harm, is in immediate danger or has been harmed. The criminal acts of sexual violence must be referred to the police. Even if the alleged perpetrator is under the age of ten (the age of criminal responsibility), the starting principle of referring to the police remains; the police will take a welfare, rather than a criminal approach, in these cases. Ultimately the DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

When a report of an incident of sexual violence or sexual harassment is made, before deciding what to do next, the DSL should consider the following:

- the wishes of the victim, balanced with school's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the age (particularly if there is more than two years' difference or if one child is pre-pubescent and the other is not), developmental stage and any power imbalance between children, including any ongoing risks;
- if the alleged incident is a one-off or a sustained pattern of abuse, sexual or otherwise;
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- the importance of understanding intra-familial harms and any necessary support for siblings following incidents;
- whether there are ongoing risks to the victim, alleged perpetrator, other children or staff;
- whether a child displaying harmful sexual behaviours may be a victim of abuse themselves;
- any special educational needs and whether the SENCo needs to be involved;
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation;
- whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur.

One-off incidents of sexual harassment may be dealt with under the School's Behaviour Policy or Anti-Bullying Policy, if it is the view of the DSL that the children concerned are not in need of Early Help or referrals to statutory services. The [DfE's Behaviour in Schools advice](#) is clear that pupils can be sanctioned if their conduct falls below the standard which could be reasonably expected of them. The response should still be underpinned by the principle that there is a zero tolerance approach to sexual harassment.

In exceptional circumstances, the school may require a pupil to remain away from the school site temporarily where there is a serious and immediate risk that cannot be safely managed on site. This is not a sanction. All cases of safeguarding separation will be managed in accordance with the Trust's Suspensions and Permanent Exclusions Policy.

For incidents of non-violent harmful sexual behaviours, an Early Help intervention may be appropriate. A referral should be considered for both the victim and the perpetrator.

For all incidents where a child has been harmed, is at risk of harm or in immediate danger, the case should be referred to Children's Social Care. The school should not wait for the outcome (or even the start) of a social care investigation before protecting children in the school, although there should be close working with Children's Social Care to ensure actions taken do not jeopardise a statutory investigation. The risk assessment will help inform any decision and consideration of the victim, alleged perpetrator(s), any children directly involved in the incident and all other children at the school should be immediate. The DSL should be prepared to make a further referral to Children's

Social Care if it is decided that a statutory intervention is not appropriate but they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL should consider other support mechanisms such as Early Help, specialist support and pastoral support.

All incidents of sexual violence (rape, assault by penetration or sexual assault) should be reported to the police. This will generally be made in parallel with a referral to Children's Social Care. The police should agree with the school what information can be disclosed to staff and others, in particular the alleged perpetrator(s) and their parents/carers, and the best way to protect the victim.

Parents/carers will generally be informed unless there are compelling reasons not to, for example if to do so would put a child at additional risk.

It may be appropriate to complete a risk assessment (see Annex 9 for a template). In cases of sexual violence, a risk assessment must be put in place immediately. In cases of sexual harassment, the risk assessment should be considered on a case-by-case basis and a decision should be made as to whether the victim and alleged perpetrator(s) should be kept apart, with the emphasis on ensuring the victim can continue their normal routines. It is important the victim feels in as much control of the process as is reasonably possible. A risk assessment should consider the victim, the alleged perpetrator(s) and other children and staff at the School. It should also consider the context of the place where the risk was identified and what steps could be taken to reduce risk repetition. It should be shared with parents/carers. The risk assessment should be reviewed and updated regularly.

Appropriate disciplinary measures may be taken by the School. If there is an ongoing police or social care investigation this must not be jeopardised, but the School may still undertake its own disciplinary measures by considering the conduct of the alleged perpetrator(s) as part of their Behaviour Policy and applying appropriate and proportionate consequences based on their own conclusions about what happened on 'the balance of probabilities', unless it is prejudicial or unreasonable to do so. The alleged perpetrator(s) must also be provided with support alongside any disciplinary measures.

If other pupils are affected, for example as witnesses, steps should be taken to provide support, to ensure the other children don't 'take sides' and to prevent victimisation of the victim or alleged perpetrator(s).

All concerns, discussion, decisions and reasons for decisions must be recorded on MyConcern. If one of the pupils involved moves schools, the DSL must liaise with the new school in relation to the incident.

The following situations are statutorily clear and must therefore always be referenced:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape;
- rape, assault by penetration and sexual assault are defined in law;
- creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting, indecent imagery or youth-produced sexual imagery). This includes children making and sharing sexual images and videos of themselves.

Cases reported to the police

In criminal investigations, the legal right to anonymity must be borne in mind, for example in relation to social media. The School will take steps to prevent this legal right being disregarded, as far as is possible.

If cases reported to the police result in a conviction or caution, the Behaviour Policy will be followed. This may involve consideration of permanent exclusion. If the perpetrator remains in school, plans will be made for the future, including any required behavioural expectations or conditions. If the alleged perpetrator(s) is/are found not guilty or if no further action is taken, arrangements will be made to support both the victim and the alleged perpetrator(s).

In cases of sexual violence, the alleged perpetrator(s) should be moved from any shared classes with the victim whilst the facts of the case are established. Consideration should also be given to any other shared spaces within the School and the journey from home to school and back again, looking at how best to keep the victim and alleged perpetrator(s) a reasonable distance apart. School must not wait for the outcome, or even the start, of a police investigation before putting in place measures to protect the victim, the alleged perpetrator and other children at school.

Ongoing considerations

Once the next steps have been determined in terms of progressing any report of sexual violence or sexual harassment, the DSL should again consider the question of the victim and alleged perpetrator(s) sharing classes and spaces at school, considering both the duty to safeguarding children and the duty to educate them (consider age, developmental stage of the alleged perpetrator(s) and the nature of the allegations, as well as the proportionality of the response). Risk assessments should be updated as appropriate.

Where there is a criminal investigation, the alleged perpetrator(s) should remain removed from any classes shared with the victim and a reasonable distance maintained around the school and on the journey to and from school.

Where a criminal investigation leads to a conviction or caution, the School should take suitable action, if not already done so. Rape or assault by penetration is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school would seriously harm the education or welfare of the victim, and possible other children at the school. Sexual assault may also consider permanent exclusion amongst any other suitable sanctions in light of the behaviour policy. Where the decision is that the perpetrator(s) will remain at the school, the principle would be to continue keeping the victim and perpetrator(s) separated. The exact nature of the conviction or caution, as well as the wishes of the victim, will be important in determining how to proceed. The school should update their risk assessment to ensure relevant protections are in place for all children at the school and the expectations regarding the perpetrator should be made very clear.

Reports of sexual assault and sexual harassment may not lead to a report to the police, or if reported may not be progressed or may result in a 'not guilty' verdict. It is important to note that this does not necessarily mean that the offence did not happen or that the victim lied. Appropriate support should be provided to both the victim and the alleged perpetrator(s) and consideration given to sharing classes and potential contact. Again, this should be considered with the needs and wishes of the victim at the heart of the process, supported by parents/carers as required. Any arrangements should be kept under review.

School can be a significant protective factor for children who have displayed harmful sexual behaviour and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider. It is important they are given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. If an alleged perpetrator moves to another school, it is important that the new setting is made aware of any ongoing support needs and potential risks to others.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child or person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. If a report is shown to be deliberately invented or malicious, disciplinary action should be considered for the individual who made it.

Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a [Sexual Assault Referral Centre \(SARC\)](#) in the form of medical, practical and emotional care and advice, regardless of when the incident occurred. Support can also be sought from Early Help, Children and Young People's Independent Sexual Violence Advisors (ChISVAs), CAMHS, [Rape Crisis](#), [The Survivors Trust](#), [Male Survivors Partnership](#) and/or [NHS](#), amongst others.

Annexe 8 Safer Handling Policy

Our qualified Safer Handling trainer and expert witness on the use of force with children is Doug Melia who has had input constructing this policy: doug@safer-handling.co.uk 03300 235636 / 07872500272.

This policy sets out the framework for the use of reasonable force in the form of holding, handling, escorting and in extreme circumstances physical intervening to prevent a greater harm from occurring, but it must be clearly understood that this should always be set within the school's overall behaviour management framework and is only used as a last resort under-pinned by sound risk assessment. Providing successful inclusion may necessitate physical restraint but only as one of the strategies available for the management of challenging behaviour. Only in the event of failure of clearly defined protocols to bring control to the situation, or imminent danger to persons, should such measures be considered. This does not prohibit force to be used as a first resort where it is necessary and proportionate to the circumstances to prevent a greater harm or greater perceived harm from occurring.

Legislation that came into force on 1 September 1998 (Section 550 of the Education Act 1996) together with national guidance (DfES Circular 10/98), establishes in a school setting the existing common law precedents allowing one to prevent harm to self, others and damage to property. It clearly sets out the powers of teachers and other staff to use reasonable force if required. This applies to all occasions when that member of staff is in charge of children both on and off school premises. The Criminal Justice and Immigration Act 2008 gives us the definition of reasonable force as using force only when necessary and then making sure that such force is proportionate to the harm, or perceived harm, avoided. There is no legal definition, reasonable force depends on the individual circumstances of each case and only a court may judge what is reasonable in terms of the amount of force used in physical handling or self-defence and obviously does so retrospectively.

Staff members are reminded that this is a "power" and not a duty, staff have a duty of care to themselves and others including the children in their care. Where a staff member feels that by exercising their power to intervene physically they may put themselves or the child in physical danger, or they feel that their intervening may cause a greater harm or is likely to fail, then they are advised to seek a safer alternative option.

Staff members should try to avoid injuring pupils, however in extreme circumstances this may not always be possible. Force cannot be used for revenge, retaliation, retribution or to teach someone a lesson. To reduce the risk of serious injury, methods of intervention to avoid include the following:

- holding a child around the neck, collar or other way that may restrict breathing;
- slapping, punching, kicking or tripping a child;
- holding or pulling a child by their hair or ear;
- twisting or forcing limbs against joints;
- indecently touching or holding;
holding a child on the ground prone (face down) or supine (face up);
- use of basket holds – holding a child's arms across their body from behind (also known as a wrap);
- lifting a child off the floor in order to intimidate.

Note. An adult in charge of children has a responsibility to intervene in the event of the following types of incident. Types of incident where the use of force may be necessary are given as:

- action due to imminent risk of injury to themselves or others;
- action due to imminent risk of significant damage to property.

In some circumstances it may be possible to remove the rest of the children from the area and allow the child concerned to calm down safely. Where this presents a lesser risk of injury to all concerned this may be a more favourable option.

Definitions of restraint include: the positive application of force with the intention of overpowering the child or a positive containing experience for the child. Both refer to using holds or intervening only where it is absolutely necessary and where a non-physical method (verbal or non-verbal prompt) is either failing or is likely to fail.

The use of restraint requires skill, judgment and knowledge of a range of both non-harmful methods of control and restrictive methods of physical intervention. Reasonable force where used in circumstances which are necessary includes those methods taught and practised in the Edexcel Safer Handling (Care & Control) award certificate.

Where necessary, the degree of force employed must be in proportion to the perceived outcome of the incident, taking into consideration the severity of the behaviour or the consequences it is intended to prevent. Any force should always be the minimum needed to achieve the desired result with the highest degree of certainty (staff must use enough force for their intervention to be successful but not as to be excessive). The persons (unless it is an instinctive intervention or emergency action then there should always be a minimum of two staff physically intervening with a pupil) exercising the restraint must be authorised by the Principal and those who have received appropriate Edexcel Safer Handling Care & Control approved training that is in date.

Staff must take into account if the child has an individual risk assessment or a medical need and follow any guidelines mentioned. Individual staff risk assessments must be considered (see template Risk Assessment for the Use of Restraint below).

In the event of restraint becoming necessary, where appropriate before touching the child, the member of staff should advise the child calmly and repeatedly about what they are going to do and why, and how the child might change his/her behaviour, in order that the restraint would become unnecessary. If appropriate any other children and adults present should also be warned. **Note: this warning must not compromise safety or instigate any threat of unlawful attack.**

A second adult should always be present to assist with any holds to reduce the risk of the member of staff or child suffering bodily harm and as a witness if allegations of assault are made later by the child. Single person interventions should not be used as they are inconsistent with UK Law including Manual Handling regulations (Management of Health and Safety Regulations 1999). They are very difficult to risk assess, dangerous for those involved and put staff and pupils at risk.

However, this would not take away from a person intervening in an emergency should they deem it to be absolutely necessary to prevent a greater harm occurring which couldn't be safely controlled with a non-physical alternative. Staff are encouraged to win time to call for help and manage their personal space as an alternative to physically intervening on their own.

While intervening, the member of staff must:

- minimise the amount of time where the child is restrained;
- avoid prolonged struggling;
- wherever possible keep talking to the child and give choices as to how they could behave in a manner that would end the need for restraint;
- always look to use the least intrusive method of intervention;
- remain calm and manage any verbal abuse professionally.

Pupils should not be restrained on the floor. Where a pupil drops to the ground they are to be held until it is safe to release and then, where safe to do so, monitored as they get back onto their feet. If it is not necessary to hold them, then staff should not.

If restraint is required for an extended period (for example, more than five minutes), a senior member of staff must monitor the situation closely with a view to safeguarding the child and the staff concerned.

After the incident, it is vital that a full report is completed by all concerned (see Incident Reporting and Recording Form below) and the agreed de-briefing procedures adhered to in order to support the child, the members of staff involved, the parents, any other children involved and in line with our Safeguarding Policy.

In the event of an incident when physical restraint is required, an incident form will be completed within 24 hours. Separate accounts of the incident must be completed by all staff present and attached to the incident form. If possible, all staff and children involved will undertake a de-briefing meeting with the Principal within 24 hours. The parents/carers should be contacted by the Principal as soon after the incident as possible, and use of Safer Handling confirmed in a follow up letter. Copies of the form and accompanying notes will be kept by the School. If an injury has been incurred to anyone involved, the usual procedures regarding this will be followed.

In the event of physical restraint being necessary on more than one occasion to manage the behaviour of an individual, it would be appropriate to include safer handling advice in any plan regarding the child. It is also necessary to compile an individual risk assessment in discussion with all staff, parents and any relevant outside agencies. In the case of a child with an Education, Health and Care Plan, there will be opportunities to address issues of challenging behaviour at annual review meetings and an interim review organised in exceptional circumstances. Looked-After Children will have a Personal Education Plan which features planning and strategies to address challenging behaviour, where appropriate.

The Principal, Senior Leadership Team and Governors need to ensure that all authorised teachers and other authorised staff are appropriately trained and updated and accept the responsibility of their role by being aware of the guidelines in this policy. Records are to be kept of any physical restraint or incident involving physical contact. These are to be clear, comprehensive and prompt (completed within 24 hours of incident). Parents must be informed each time a form is completed. These records will be part of an ongoing annual review procedure that examines practice and informs future planning.

The Principal, Senior Leadership Team and Governors need to ensure that, as far as possible, preparation and planning has taken place to identify areas where physical restraint might be used. However, the school may also have to intervene in circumstances where preparation and planning have not been possible. When physical restraint takes place, the school will always endeavour to protect children and adults from physical harm, however there may be cases in which some discomfort and/or bruising may occur, to both staff and children, as a result of the restraint taking place. If, after receiving the report of an incident where physical intervention has occurred, the Principal considers the School's guidelines have been seriously breached and that further investigation is warranted, the incident should not be pursued, but action in accordance with Child Protection procedures must be taken. In these circumstances, any school internal investigations must cease and no further statements should be taken. If the School's guidelines have been breached, the Principal will contact the LA Personnel Division and advise the staff member to consult his/her professional association. Where necessary the Safer Handling trainer (Doug Melia) or local police should be informed of the circumstances as an impartial and competent professional's view on the force used would be preferential prior to taking action such as suspending the member of staff, as per the Employment

Rights Act 1996, which makes it an offence to discipline or dismiss: "Members of staff should not be disciplined or dismissed for taking action to defend themselves or others in circumstances of serious or imminent danger."

The use of restraint is only acceptable when the pupil is at serious risk of injuring themselves or other children, significantly damaging property.

Name of Pupil	Date of Birth	Name and role(s) of person(s) completing the RA	Type of Risk Assessment (please tick)	Date Completed
			Initial Review	
Summary of reason for risk assessment, including any previous incidents and/or relevant context				

What is the identified risk? (Be specific)	To whom is the risk posed?	What safety measures are already in place to manage the risk?	What further measures need to be implemented?	Who will implement these measures?	By when?	How will the success of these measures be assessed?	Review date and comments
Risk of injury to adult	The individual adult	Restraint used only as a last resort. Safer Handling techniques used by trained personnel.					
Risk of injury to child	The individual child	Restraint used only as a last resort. Safer Handling techniques used by trained personnel.					
Risk of further injury to an existing staff medical condition	The individual adult	Any existing staff medical conditions must be disclosed to the Principal/Head of School and advice taken as to whether the use of restraint in any circumstances is viable.					

Risk of distress to other children	All	Whenever possible, other pupils should be taken to another location or the child being restrained removed to a place of safety.					
Risk of complaint from parent	Trained staff	Always call for assistance. Wherever possible, at least two adults should be present.					
Risk of repeated incidents	Individual pupils at significant risk	In certain circumstances, a place/room of safety will be created and used where there is a risk of repeated/regular occurrences.					

Risk assessment completed by:		
School (print name of staff):	Signed:	Date:
Parent/carers:	Signed:	Date:

Incident Reporting Form

School:		Name of pupil:
Year group:	Vulnerabilities: (consider SEND/LAC/ social care involvement etc.)	
Date and time of incident:		Location of incident:

Staff involvement

Name	Role	Safer Handling trained? Y/N	Date of training	Involved physically or as observer? P/O	Independent account completed? Y/N (See below)	Staff signature

Staff accounts

Each person listed above must provide an independent written account to describe the incident, including:

- What was happening before the incident?
- What do you think triggered this behaviour?
- What de-escalating techniques were used prior to physical intervention?
- Why was physical intervention deemed necessary?
- What holds/techniques were used during physical intervention?
- How long was each hold used for?
- Any other relevant information

All accounts must be attached to this form.

Incident summary

What led to this being a dangerous situation?			
What was the nature of the risk? (Circle/highlight all relevant options)			
Injury to person	YES	Damage to property	YES
Criminal offence	YES	Serious disruption	YES
Absconding	YES	Other (please detail)	
What de-escalation techniques were used? (Circle/highlight all relevant options)			
Verbal advice/support	YES	Firm clear directions	YES

Incident Reporting Form

Negotiation	YES	Limited choices	YES
Distraction/diversion	YES	Reassurance	YES
Planned ignoring	YES	Positive touch	YES
Calm talking/stance	YES	Time out/withdrawal	YES
Transfer of adults	YES	Reminded of consequences	YES
Humour	YES	Reminded of successes	YES
Other (please detail)			
Safer Handling holds/strategies used:			
How long was the pupil held for?			
Pupil's comments throughout:			

Incident review

Were any injuries incurred?		
To whom?	Medical check offered? Y/N	Medical check accepted? Y/N
Parents/carers informed (date, time, by whom, how):		
Pupil debrief (date, time, outcome):		
Staff debrief (date, time, outcome):		

The Principal should review what happened to consider what lessons can be learned which may have implications for the future management of the pupil. This should inform any risk assessments or other individual plans in place.

If a pupil has been involved in physical intervention on more than one occasion, a risk assessment must be put in place and consideration given as to the inclusion of Safer Handling advice in any plan regarding the child, e.g. EHCP, pupil profile, behaviour plan, PEP, etc.

Report completed by:		
Name:	Signed:	Date:

Annexe 9 Risk Assessment

TGAT Safeguarding Risk Assessment

Name of Pupil	Date of Birth	Name and role(s) of person(s) completing the RA	Type of Risk Assessment (please tick)	Date Completed
			<i>Initial</i>	
			<i>Review</i>	

Summary of reason for risk assessment, including any incidents and/or relevant context

What is the identified risk? (Be specific)	To whom is the risk posed?	What safety measures are already in place to manage the risk?	What further measures need to be implemented?	Who will implement these measures?	By when?	How will the success of these measures be assessed?	Review date and comments

This risk assessment will be reviewed:*	<i>Please Tick</i>
On a weekly basis	
On a monthly basis	
On a 3 monthly basis	
Other (please give reason for decision)	

****unless there is an escalation or change in risk, in which case a review will be immediate***

Is the pupil's voice reflected within the risk assessment?	
If the DSL is not completing the risk assessment, have they been informed and involved as necessary?	
Date risk assessment uploaded to MyConcern	

This risk assessment has been shared/discussed with:

Role	Tick	Name	Date shared	Contact Number/Email	Details of response (if any)
Pupil					
Parent/Carer					
Principal					
Social Worker					
Health Professional					
External Agency (state which agency)					
Police/Youth Offending Services					
Other (give details)					

Annexe 10 Risk Assessment for Volunteers

This risk assessment should be completed when considering whether a person working as a volunteer at the school should be asked to apply for an enhanced DBS certificate.

Name of Volunteer: _____

Is the volunteer in Regulated Activity? (*Work that involves providing care, supervision, teaching, training or support for children on more than 3 days in a 30-day period, or overnight*).

Yes ☐ An enhanced DBS with Barred List check is required

No ☐ Complete risk assessment below to decide if an enhanced DBS without Barred List check is required

Areas to consider

In what capacity will the volunteer be working with pupils?	
What is the age group of the pupils that the volunteer will work with?	
Are these pupils regarded as particularly vulnerable?	
How frequently will the volunteer be in school?	
Has the volunteer's identity been verified?	
What relevant information does the school already know about the volunteer and what is the connection of the volunteer to the school?	
Is the volunteer in paid employment or working in a voluntary capacity elsewhere with children?	
Can the volunteer provide at least one reference from someone other than a family member?	
Is the volunteer or school aware of any reason why they should not volunteer to work with children?	

Decision

Is an application for an enhanced DBS check required? This **must** be undertaken if the volunteer is in regulated activity.

Yes ☐

No ☐

Reason:

Principal: _____ Date: _____

Annexe 11 Visiting Speakers Vetting Procedure

The School is part of a wider community. Occasionally we have speakers/performers from this community who enrich our pupils' experience of school, providing pupils with information that helps them to make decisions at different phases of their education, widening their understanding of world and global issues and providing motivational inspiration through the sharing of a speaker's/performer's experience. Our responsibility to our pupils is to ensure that they can critically assess the information they receive as to its value to themselves and that the information is aligned to the values of the school. We achieve this through the following protocols:

All requests for outside speakers/performers must be discussed with the College Leader/Principal and a Visiting Speaker/Performer Form completed (see below). To complete this form the staff member organising the event must provide:

- a brief biography of the speaker/performer or institution with the purpose clearly defined as to the information the speaker/performer wishes to communicate. The information must align to the values of the School. This must be discussed with the organiser prior to the request being made and the Visiting Speaker/Performer Form being completed;
- a named 'link contact' for the speaker/performer who will be the liaison with school;
- the staff member responsible for arranging the visit must ascertain that all information communicated by the speaker/performer is lawful.

On receipt of the form the College Leader/Principal will make a decision regarding permission for the speaker/performer to come to the School. Please note that, whenever possible, a period of no less than one month's notice should be given prior to the speaker/performer's proposed visit to the school. For secondary schools, once agreed, the form will be forwarded to the Principal for final authorisation.

Please note: the staff member must send or give the speaker/performer a copy of the Visiting Speaker/Performer Agreement in advance of the visit (see below); this is to ensure the speaker/performer is able to prepare in advance of their visit regarding our values and will be familiar with the declaration before being required to sign it on arrival at school.

Further guidelines

School safeguarding procedures apply and the visiting speaker/performer will be asked for evidence of identity. Unless DBS status has been verified as clear prior to the visit, the speaker/performer will not be allowed unsupervised access to the school site. A member of school staff will therefore accompany the speaker/performer at all times. Speakers/performers will be issued with further safeguarding information on arrival at Reception to ensure they are familiar with the safeguarding arrangements within the School. They will be issued with a visitor's lanyard which they must wear at all times.

During the speech/performance - monitoring

A member of staff must be present during the event to monitor the speech/performance. In the unlikely event that the speech/performance does not meet the requirements of an educational setting, immediate action will be taken by the member of staff to balance the information given and to stop the performance in extreme circumstances.

Visiting Speaker/Performer Form

Date of Event	
Time of Event	
Purpose of speech/ performance (including year groups involved)	
Name of speaker/performer and organisation How did you become aware of this visitor?	
Brief biography of speaker/performer/ organisation (continue on additional page if necessary)	
Confirm that research (e.g.: internet search) has been carried out on the speaker/event, and the organisation they are affiliated to – record detail	
Name of link person to liaise with school	
Contact details for link person	
Tudor Grange staff member responsible for visit	
Venue/Room	
Authorisation by College Leader/Principal: Having assessed the level of risk I am satisfied that this speaker/visit is suitable and that the planned event can go ahead. OR Having completed this risk assessment I have reflected on the evidence, and made the decision that this visit MUST NOT go ahead. (College Leader/Principal to take appropriate action)	 (sign and date) Event MUST NOT go ahead and has been cancelled by the College Leader/Principal (sign and date)
Confirm that you agree to ensure that the speaker is accompanied at all times, whilst on the premises	YES NO

If speaker/performer will be unaccompanied at any time or if they are likely to visit again in the future please supply the following details:

DBS	
Position/job disclosure covers:	
Name of Employer:	
Name of Registered Body:	
Date of DBS Certificate:	

This is to confirm that all information communicated by the speaker/performer is lawful and will not undermine the values and ethos of the school.

Signed by College Leader/Principal:		Date:	
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Post visit feedback:

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Visiting Speaker/Performer Agreement

We understand the importance of visitors and external agencies to enrich the experiences of our pupils.

In order to safeguard our children we expect all visiting speakers to read and adhere to the statements below.

- any messages communicated to pupils support fundamental British Values and our school values;
- any messages communicated to pupils are consistent with the ethos of the school and do not marginalise any communities, groups or individuals;
- any messages communicated to pupils do not seek to glorify criminal activity or violent extremism or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies;
- activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication;
- activities are matched to the needs of pupils;
- visitors will also be accompanied by a member of staff at all times.

Signed:.....

Date: