



Safeguarding Handbook

Compiled by Catriona Mangham

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Introduction

Safeguarding and promoting the welfare of children is everyone's responsibility.

Keeping Children Safe in Education (KCSiE), 2023 details the practices and procedures that need to be in place in school. Practitioners must refer to this document, in full.

This Safeguarding Handbook provides additional, operational expectations.

The aim of this handbook is to ensure:

- All our pupils are safe and protected from harm.
- Safeguarding processes procedures are in place to help pupils to feel safe and learn to stay safe.
- Adults in the academy community are aware of the expected behaviours and the academy's legal responsibilities in relation to safeguarding and child protection.

Everyone who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child. (KCSiE 2023)

Part One

This should be read in liaison with the Child Protection and Safeguarding Policy and KCSiE 2023. It details the procedures that schools are expected to follow on a daily basis.

Part Two

This provides additional, useful information. It supplements but does not substitute for reading Annex B, KCSiE. Practitioners should refer to KCSiE as their primary reference source.

The difference between Safeguarding and Child Protection

In essence,

Safeguarding applies to all children and young people.

Child Protection refers to the procedures and support given to those children and young people who have experienced abuse in their lives.

Safeguarding and Child Protection is about managing risk.

Safeguarding and promoting the welfare of children is everyone's responsibility.

Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.

Safeguarding is protective and child protection is reactive.

What is Safeguarding?

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as

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

Children includes everyone under the age of 18

Effective Safeguarding

Safeguarding is what we do for all children and young people to keep them safe whilst in the care of our academies. Child Protection describes the policy and procedures specifically for those young people who are at risk of serious harm or have been seriously harmed.

Safeguarding is what we do for all children and young people. Child Protection is what we do for children who are at risk of significant harm and those who have been significantly harmed.

As an Academy within Excalibur Academies Trust we expect the following as a minimum to be in place in all our academies to facilitate effective safeguarding.

Ethos

- The essential starting point of the academies approach to safeguarding and child protection
- The "heartbeat" of the organisation
- Could be negative or positive
- Openness
- Transparency
- Supportive
- Respectful

Policy

- To use the model EAT safeguarding and CP policy
- Should be personalised and relevant to the school in the sections highlighted
- Should set out exactly how concerns are raised
- Should be in a place all staff and parents can access it online and all staff made aware of it.
- Should be updated every year after new policy sent out by EAT central team.

Continued Professional Development (CPD)

- Aim to develop knowledge over time, one safeguarding session each year is not enough to cover all information staff need to know
- Staff CPD should be “regular” and “updated”
- Building capacity to safeguard: as a school, in teams and as individuals
- Standing item on every meeting agenda, sometimes short, sometimes longer items
- Plan the CPD safeguarding over time
- Staff know they have read Keeping Children Safe (Part One), the staff Code of Conduct, the behaviour policy and the Safeguarding and Child Protection Policy
- Important to use these learning events to develop consistency across the school
- All academies to follow the training matrix as detailed later in the handbook. Any diversion from this needs to be put in writing and agreed by the Head of Safeguarding.

Safer Recruitment

- Know who is in the school and that they have been suitably vetted
- Single Central Record keeping it statutory, using the EAT spreadsheet and checking regularly
- Identifying which roles are “regulated activity”
- Safer recruitment practices in place
- The “Safeguarding Commitment” noted on all recruitment materials
- Job descriptions
- Person specification
- Interview questions
- Safer Recruitment training for all relevant staff
- Thinking the Unthinkable – even after appointment
- Right to work in the UK
- Staff Code of Conduct
- Guidance for Safer Working Practices 2019
- DBS checks

Safer Perimeter

- Aiming for one single point of entry (and exit); and that adults supervise any other open entry/exit points when necessary
- Appropriate fencing and buffer zones
- Ensuring that pupils and vehicles are separated
- Recognising that the start and end of the school day is most risky
- Traffic and road safety
- Identifying visitors
- Recording visitors who have accessed the site
- ID checks
- Lanyards and photo ID badges
- Visitors' acceptable use of phones, tablets and laptops
- Visitors' acceptable use of social media
- Leaflets outlining safeguarding approach using the EAT format

- Security measures that prevent pupils bring in dangerous or unsuitable items, e.g knives, drugs or extremist materials
- Use of CCTV cameras and the prevention of misuse of challenge under the Data Protection Act
- Lock down or critical incident planning

Community

- Risks, responsibilities and sources of support
- School community: staff, pupils, parents
- Wider local community and the different communities within that
- Socio-economic issues

Beyond Community

- The online world to be a central concern
- Safe Use and Misuse to be taught
- 24 hour news coverage provides no time for assimilation this needs to be discussed and taught alongside “fake” news
- Complete SWGfL 360 online safety assessment at least every two years
- Follow the EAT online safety policy
- Ensure the monitoring of online alerts
- See also “Teaching online safety in schools” (DfE, 2019)

Risk

- Goes hand-in-hand with curriculum
- Local, National and International
- Annual risk assessment of risk should be conducted as part of your action planning
- Academies should review how effective their Critical Incident Planning (CIP) is at least once every 2 years?
- All academies should have a lockdown procedure and this is practiced at least once a year.
- Consider health emergencies or medical situations and discuss how these would be managed

Curriculum

- Goes hand-in-hand with risk
- Curriculum should help pupils recognise, understand, cope and develop resilience to the risks around them
- Structured curriculum and unstructured curriculum should be mapped and reviewed on a regular basis it is not enough to say you use “jigsaw” or a similar product.
- “Hidden” curriculum or “Peer-led” curriculum (what students are learning from each other) should be discussed and evaluated on a regular basis

Partnership

- Safeguarding Partnerships - all academies should be signed up to their partnership newsletters and all DSLs should attend any network meetings.
- Academies should develop wider partnerships, e.g. business, charities or counsellors and therapists

- Partnerships in the local area should also be attended, for example, local DSLs forum
- All academies should sign up to the NSPCC safeguarding newsletter

Transition planning

- To ensure that children do not “fall through the net”
- There is timely sharing of information (within 5 days)
- Transition is effective at all transfer points, including Key Stages, schools, colleges, mainstream or special settings
- To prevent “start again syndrome”
- To be able to evidence transfer of records with a receipt
- To use CPOMs as transfer whenever possible.

Monitoring and Evaluation

- Essential to ensure that the processes are effective
- Think about the ways that this can be done: surveys, focus groups, discussions, data analysis, learning walks
- This should be conducted on a regular basis and timetabled into the school review calendar

Aspects of Safeguarding

Safeguarding is not just about protecting children from deliberate harm. It includes issues for academies such as:

- ◆ Bullying, including cyber-bullying
- ◆ Child abduction and community safety incidents
- ◆ Children missing education
- ◆ Child sexual exploitation
- ◆ Children with family members in prison
- ◆ "county lines"
- ◆ Criminal exploitation of children
- ◆ Cybercrime
- ◆ Domestic abuse
- ◆ Drug and substance misuse
- ◆ Educational visits
- ◆ E-safety
- ◆ Fabricated or induced illness
- ◆ Faith abuse
- ◆ FGM
- ◆ Forced marriage
- ◆ Gangs and youth violence
- ◆ Gender-based violence/violence against women and girls (VAWG), including so-called "honour-based" abuse
- ◆ Harassment and discrimination
- ◆ Homelessness
- ◆ Intimate care
- ◆ Management of contractors
- ◆ Management of visitors
- ◆ Meeting the needs of pupils with medical conditions, including mental ill-health
- ◆ Modern-day slavery
- ◆ Peer-on-peer abuse
- ◆ Private fostering
- ◆ Providing first aid
- ◆ Pupils' health and safety
- ◆ Racist abuse
- ◆ Preventing radicalisation
- ◆ School security, taking into account the local context
- ◆ Self-harm
- ◆ Serious violence
- ◆ Sexual violence and sexual harassment between children
- ◆ Sharing nudes and semi-nudes
- ◆ Teenage relationship abuse
- ◆ Trafficking
- ◆ Use of physical intervention
- ◆ Other issues which may be specific to a local area or population

It is important that all academies consider safeguarding under all of these headings and discuss and review how they addressing them.

The four categories of child abuse

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Physical abuse

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

Sexual abuse

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

Neglect

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;

- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment

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

Please also see Working Together to Safeguard Children (2018), Appendix A

Further documentation -

National Institute for Health and Clinical Excellence

The documentation from the “National Institute for Health and Clinical Excellence” (NICE) has a number of guidance documents and pathways to identify child maltreatment and related issues.

When to suspect child maltreatment (CG89)

Child abuse and neglect (NG76)

Children’s attachment (NG26)

Harmful sexual behaviour among children and young people (NG55)

Domestic violence and abuse: multi-agency working (PH50)

Signs of abuse and neglect

High Risk Factors

- Families with complex needs
- Parental substance use
- Poor parental mental health
- Parents with learning difficulties
- Children with disabilities
- Families with history of childhood abuse
- Domestic Violence

Sexual abuse -

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities including non-contact activities.

Key features – there are few physical signs, more likely to be emotional and behavioural factors.

- Aggression
- Withdrawn
- Self-harming, including eating disorders
- Drawings of sexually explicit behaviours
- Inappropriate sexualised conduct
- Sexually explicit behaviour
- Reluctance to change clothing for swimming or PE

Sexual abuse can be very difficult to recognise and reporting sexual abuse can be an extremely traumatic experience for a child. Studies indicate that between 80 and 90% of cases involve a known adult.

The internet has increased the risk of non-contact sexual abuse and children must be alert to these dangers when online.

Physical abuse

Physical abuse involves any action that causes physical harm to a child including fabricating the symptoms of or deliberately inducing illnesses.

Key features-

- Bruising of various ages
- Bite marks
- Burns and scalds
- Fractures in non-mobile children
- Injuries in unusual areas of with well-defined edges
- Old injuries or scars
- Refusal to discuss injuries
- Inconsistent explanations
- Talk of punishment which seems excessive

- Arms and legs kept covered
- Reluctant to remove clothing for swimming or PE
- The parents are uninterested or undisturbed by an accident or injury

Neglect

Neglect is the failure to meet a child's physical and or psychological needs.

Key features -

- Persistently hungry
- Inadequate clothing for the child's size, weather or time of year
- Underweight for age
- Frequent school absences
- Poor health
- Emotionally needy

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child.

Key features

- Developmental delay
- Abnormal attachment to parent/carer
- Low self-esteem
- Lack of confidence
- Inappropriate emotional response

Modern Slavery

Please see Excalibur Academies Trust Modern Slavery and Human Trafficking Statement 21-22

Actions where there are concerns about a child or conduct of an adult

PUT IN PLACE YOUR FLOWCHARTS

The Designated Safeguarding Lead

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during academy or college hours) for staff in the academy or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual academies working with the DSL, to define what “available” means and whether in exceptional circumstances availability via phone and Teams or other such mediums is acceptable.

It is a matter for individual academies and the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities. These arrangements should be clear on the school website and known to staff, students and parents. .

Record Keeping

The Designated Safeguarding Lead (DSL) is the senior academy leader responsible for the effectiveness of safeguarding. One aspect of the DSL's role is to ensure that there is effective record keeping, particularly when building up evidence over time.

Records must be kept securely in a central place, online, accessible only by those who have an authorised need. All academies must use CPOMs as their online recording. They must state that EAT named central staff are able to access their records to CPOMs.

Paper based systems that still might exist should be clearly organised using the five sections listed below:

- Admin and Chronology
- Internal Information
- External Information
- Meeting notes and reports
- Child Protection plans and other legal documents

All records will include the following:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared.

The D/DSL acts in accordance with the Information Sharing Act - DfE (2015) and in line with the local authority Record Keeping Guidance which includes details about file retention.

Academies do need to be compliant with the latest statutory guidance.

Data should be collected through a variety of forms on a regular basis (see DSL calendar), discussed at senior level and shared with the Academy Committee.

The academy action plan should be informed by this data and not just the LA and Excalibur yearly audit.

Transferring Records

Where children leave the academy (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school 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. This should be transferred separately from the main pupil file. It is important to transfer this information to prevent harm to a child. Parental consent is not required to transfer this data, since it is held to prevent harm to a child. Where parents object, the fact should be recorded and the reasons to transfer should be noted.

Primary schools do not need to keep copies of any records in the pupil record except if there is an ongoing legal action when the pupil leaves. Custody of and responsibility for the records passes to the school the pupil transfers to.

Although it is the duty of the previous school to transfer the data as soon as possible to the new establishment, occasionally parents may not share the name of the new school. It is important, therefore, that when academies admit children, they should contact the previous school to check whether there are child protection records and to transfer them when they exist. The new academy should send a letter to the previous establishment asking for written confirmation whether there are Child Protection records or not.

Where children go missing, the government guidance set out in "Children Missing from Education" should be followed.

Sending Information Securely by Post

- Confirm the name, department and address of the recipient
- Seal the information in a double envelope, ensuring the packaging is sufficient to protect the contents during transit.
- Make the inner envelope "Private and Confidential – To be opened by Addressee Only".
- Make sure that there is nothing on the outer envelope that would indicate that it contains personal information.
- Ensure a return address is included on both the outer and inner envelopes in case it must be returned for some reason.
- When appropriate, send the information by recorded delivery or by locally approved courier.
- Ask the recipient to confirm receipt. Enclose a form for them to sign and return.

Retention and Disposal of Child Protection Records

There are no statutory requirements about retention of records but Excalibur Academies Trust states that child protection records should be retained by the last academy or college that the young person attends and should be kept until the person has their 26th birthday, then securely disposed of.

Subject Access Requests

In academies and free schools in England there is no right of access for parents to see their child's educational record. It is up to the establishment to make the decision to give access or not.

Academies can withhold an educational record where the information might cause serious harm to the physical or mental health of the pupil or another individual.

Safer Recruitment – Appointments

Academies and colleges must create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might harm children.

At least one person on every interview panel must have completed “Safer Recruitment” training via Educare. However, other people are involved in the recruitment process and consideration should be given to training these people too.

Safer Recruitment training needs to be updated every 3 years.

When conducting interviews, please note in the interview paperwork who on the panel has had the training and ensure it is within the last 3 years.

For central team recruitment the Head of HR will ensure that at least one member of the panel has had up to date EduCare training.

Before you advertise:

- Ensure you have read the Excalibur recruitment and selection policy which describes the process and roles before you begin.
- Ensure you have read the safeguarding policy and that a statement about the organisation's commitment to safeguarding is included in all recruitment and selection materials.
- Ensure you have an up-to-date job description and person specification for the role(s) you wish to recruit to, have been agreed with HR.
- Ensure the advertisement includes all necessary information about the role, timetable for recruitment and your commitment to safeguarding.
- Ensure that you have compiled a suitable candidate information pack containing all the required information about the organisation, role, recruitment timetable, safeguarding policy/statement and application form.
- Ensure you have highlighted equalities within the pack and consider a representative of a protected characteristic on the panel.

Before you interview:

- Ensure each application received is scrutinised in a systematic way by the shortlisting panel in order to agree your shortlist before sending invitations to interview.
- Ensure you are considering applicants under the Excalibur Equalities Policy
- Ensure all appropriate checks have been undertaken on your shortlisted candidates, including identification, qualifications, references and, where possible, existing DBS checks and social media checks.
- Ensure all shortlisted candidates receive the same letter of invitation to interview, supplying them with all necessary information.

Before you select your preferred candidate:

- Ensure a face-to-face interview is conducted for ALL shortlisted candidates based on an objective assessment of the candidate's ability to meet the personal specification and job description.
- Ensure the interview panel consists of at least two people and at least one person has completed a "Safer Recruitment" training course.
- Ensure all specific questions designed to gain required information about each candidate's suitability have been asked, including those needed to address any gaps in information supplied in the application form.

Before you formally appoint:

- Ensure you are able to make a confident selection of a preferred candidate based upon their demonstration of suitability for the role
- Ensure your preferred candidate is informed that the offer of employment (including volunteer positions) is conditional on receiving satisfactory information from all necessary checks.

Trustee / Academy Committee Appointments

- All trustees, academy committee and board members will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- All AC members will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained academy AC member).
- The chair of the board will have their DBS check countersigned by the secretary of state.
- Identity checked
- Right to work in the UK checked
- Other checks deemed necessary if they have lived or worked outside the UK

Disclosure and Barring Service

This information should be read in conjunction with the safer recruitment section in part three of 'Keeping Children Safe in Education'.

The Disclosure and Barring Service (DBS) vets people who work with children and vulnerable adults. There are three levels of checks depending on the nature of the work that a person undertakes:

1. Standard – a check of Police National Computer (PNC) records of convictions, cautions, reprimands and warnings.
2. Enhanced – a check of the PNC records as above, plus other information that is considered relevant by the police.
3. Enhanced with Barred List Information – only legal for people working in regulated activity with children, adds DBS Children Barred List checks

Applicant Only Certificates

The Disclosure and Barring Service (DBS) only issue certificates to the applicant themselves; the employer will not be sent a copy. It is essential therefore that academies have procedures in place to monitor this and ensure they see the DBS Certificate as soon as it is available. Appropriate steps must be taken to safeguard children prior to seeing the DBS certificate by completing a risk assessment.

If all the following conditions are met, employers may be able to request copies of DBS certificates:

- The individual is subscribed to the Update Service; and
- The employer has carried out a Status Check which revealed a change to the DBS Certificate; and as a result: the individual has applied for a new criminal record check; and the DBS issued the new DBS certificate to the applicant more than 28 days ago; and the applicant has not shown the employer their new DBS certificate.

DBS Update Service

The DBS Update service is an online service which allows applicants to keep their DBS certificate up to date and employers can check the validity of a DBS certificate.

When accepting a new job in regulated employment, where the prospective worker is registered with the DBS update service and gives their consent, the new employer can easily check online whether the applicant's DBS certificate is current or not. If the DBS certificate is not current, a new application must be made. If a certificate is "not current", it may mean the subscription has expired or the certificate has been updated with new information, e.g. A warning, caution or conviction. Certificates which are not current are removed from the database.

If the information on a DBS record changes, it is the responsibility of the employee to inform their employer. An update is not sent to either the employee or employer.

The DBS Update Service can only be used within the same workforce group as the DBS Certificate

- Child Workforce
- Adult Workforce

Status Check Outcomes

The outcome of a check using the DBS Update Service will be one of the following:

This Certificate did not reveal any information and remains current as no further information has been identified since its issue.

- This means the individual's Certificate contains no criminality or barring information and no new information is available.

This Certificate remains current as no further information has been identified since its issue

- This means the individual's Certificate did contain criminality or barring information and no new information is available.

This Certificate is no longer current. Please apply for a new DBS check to get the most up to date information.

- This means the individual's Certificate should not be relied upon as new information is now available and you should request a new DBS check.

Updating CRB Certificates obtained before June 2013

There is no legislation which requires academies to undertake repeat DBS checks on staff whose CRB certificates date back before June 2013, in fact if there has been no change in employment since May 2006 there is no requirement to check at all. However the older the check is, the less reliable it is.

Whilst there is no "requirement" to do so, academies may undertake checks if they wish.

Academies should consider their own situation and assess the risk to their pupils of staff who have not been subject to vetting checks for a number of years. Governing bodies should ensure the safeguarding risks to students in the academy have been identified and mitigated. New DBS certificates should always be obtained when there has been a break in service of three months or more.

Renewal of DBS checks

There is no "requirement" to renew DBS checks for existing staff unless there are concerns about their suitability to work with children. Although this is the statutory requirement, it is the policy of many schools and local authorities to undertake new DBS checks from time to time. It is advised that academies and HR for central team renew any certificate that is over 10 years old. For governors new DBS requested after 8 years (2nd term).

Referrals to the DBS

Academies and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child. The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual via EAT HR.

Positions which require a DBS check

Anyone undertaking a regulated activity with children or vulnerable adults.

The Protection of Freedoms Act 2012

The Protection of Freedoms Act 2012 made a number of changes to the government requirements and reduced the scope of the definition of regulated activity.

- There is no requirement to routinely carry out DBS checks on all volunteers, even where they regularly work with children, however,
- Academies must complete a risk assessment for every volunteer who wishes to work in the school, and one outcome of the risk assessment may be that a DBS check should be carried out (KCSIE)

Changes to the Criminal Records System – November 2020

Important legal changes came into force on the 28th November 2020 to take into account a judgement by the Supreme Court. These changes are:

- Cautions given to under 18s are no longer legally disclosed.
- The multiple conviction rule has been removed so that each offence should be considered individually.

- Applicants must be told how to get independent, confidential advice on which cautions or convictions they must disclose and be given time to obtain advice.

Enhanced DBS certificates will always include the following records no matter when they were received:

- All convictions for specified offences
- Adult cautions for specified offences
- All convictions that resulted in a custodial sentence

These changes mean that Excalibur Academies Trust HR ensure that all applications are compliant with this guidance, and will, through safeguarding reviews and SCR spot checks, ensure that academies are being compliant and are following Trust guidelines.

Academies should note the following in conduct of interviews:

- Applicants should not be asked verbally in the interview whether they have any criminal cautions or convictions which would prevent them working for children, as they will not have access to the advice they may need about what should be disclosed.
- Should any protected cautions or convictions be inadvertently disclosed, it is unlawful to take that information into account in suitability decisions.
- Information used to make interview and suitability decisions should be kept in case a legal challenge is made to the decision for a minimum of six months. For the successful candidate it needs to be kept for the period of employment.
- Retained information should include:
 - Details of enhanced DBS certificates on SCR, self-declarations, interview notes, and risk assessments.
- The retention of this information must be specified in the organisation's data privacy notices and the data protection policy.
- The DBS does not have to be renewed but the Trust advises that any DBS over 10 years old needs to be renewed.

DBS Update Service – Enhanced Certificates

Enhanced DBS certificates will not be reissued unless a new application is made. This means that when academies are shown original enhanced DBS certificates prior to checking with the DBS update service, the original certificate may show cautions or convictions that would have been filtered from 28th November 2020. These offences must not be used in any suitability decisions.

Disqualification under the Childcare Act (2006) (as amended 2018)

In the summer of 2018, the government published the outcome of the “Disqualification by Association” consultation. The guidance was updated on 31st August 2018 and came into force on 3rd September 2018. A change in the law now means Disqualification by Association will only apply on domestic premises. However, disqualification under the Childcare Act 2006, still applies to staff themselves.

Academies must no longer ask about the cautions or convictions of someone living or working in their household. (It should be noted that other statutory guidance may be relevant where the third-party lives on the academy premises, such as in boarding schools.)

Main Points:

- Disqualification by Association only applies in domestic settings, not schools.
- Disqualification under the Child Care Act still applies to staff themselves who work in a childcare capacity, whether paid, volunteer or are on work placements.
- Relevant staff are those working in childcare, or in a management role because they are: working with reception age children at any time; or working with children older than reception until age eight, outside academy hours.
- KCSIE refers to disqualification. "For staff who work in childcare provision or who are directly concerned with the management of such provision, the academy needs to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009".
- Academies must bring these requirements to the attention of their staff. Academies should draw this guidance to the attention of their staff and the information provided by Ofsted.
- Academies will need to review any historic data collected and destroy any information which is no longer required.
- Ofsted will check the management of Disqualification under the Childcare Act as part of their routine academy inspection process.

Training

Keeping Children Safe in Education (2022) states that “All staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.”

Roles	Induction / on appointment	Subsequent Years
Academy Staff	<p><u>EduCare Courses:</u> Child Protection in Education</p> <p>The Prevent Duty</p> <p>Online Safety Course (to include filtering and monitoring systems)</p> <p>Equality and Diversity Course</p> <p><u>Read and understand:</u> The Child Protection and Safeguarding Policy</p> <p>The Behaviour Policy</p> <p>The safeguarding response to children missing in education</p> <p>The staff Code of Conduct</p> <p>The role and identity of the DSL and any deputies</p> <p>Section 1 and Appendix A of Keeping Children Safe in Education (KCSiE). (complete Educare questionnaire)</p>	<p><u>EduCare Courses:</u> Child Protection Refresher – annually (within two weeks of the start of term)</p> <p>Equality and Diversity – every three years</p> <p>Online Safety – every two years</p> <p>Prevent duty – every three years</p> <p><u>Made aware of (via PowerPoint or presentation on the first TD Day, annually):</u></p> <p>The Child Protection and Safeguarding Policy</p> <p>The Behaviour Policy</p> <p>The safeguarding response to children missing in education</p> <p>The staff Code of Conduct</p> <p>The role and identity of the DSL and any deputies</p> <p>Whistleblowing Procedure</p> <p>Sexual Harassment and Abuse update</p> <p><u>Read and understand (within two weeks of the start of term):</u></p> <p>Part One of KCSiE and Appendix A. (complete Educare questionnaire)</p>
Central Team Staff	<p><u>Educare Course:</u> Child Protection</p> <p>Equality and Diversity</p> <p>The Prevent Duty</p> <p>Online Safety</p> <p><u>Read and understand:</u> The model Child Protection and</p>	<p><u>EduCare Course:</u> Child Protection Refresher – annually (within two weeks of the start of term)</p> <p>Equality and Diversity – every three years</p> <p><u>Annually made aware of (via PowerPoint Prepared for the first day of term by the Head of Safeguarding; collated by HR):</u></p> <p>The model Child Protection and Safeguarding Policy</p>

	<p>Safeguarding Policy</p> <p>The staff Code of Conduct</p> <p>The role of the DSL in any of the academies</p> <p>Section 1 and Appendix A of Keeping Children Safe in Education. (complete Educare questionnaire)</p>	<p>The safeguarding response to children missing in education</p> <p>The staff Code of Conduct</p> <p>The role and identity of the DSL and deputies across the Trust</p> <p>Whistleblowing Procedure</p> <p>Sexual Harassment and Abuse update</p> <p><u>Read and understand (within two weeks of the start of term):</u> Part One of KCSIE and Appendix A. (complete Educare questionnaire)</p>
Volunteers	<p><u>EduCare Courses:</u> Child Protection in Education</p> <p><u>Read and understand:</u> Part One of KCSIE and Appendix A (by 1st October) (complete Educare questionnaire)</p>	<p><u>EduCare Courses:</u> Child Protection Refresher – annually (by 1st October)</p> <p><u>Read and understand:</u> Part One of KCSIE and Appendix A (by 1st October) (complete Educare questionnaire)</p>
<p>Those involved in Recruitment</p> <p>Note: this training is in addition to their other roles</p>		<p><u>EduCare Courses</u> <i>Note: needed by at least one person on a panel, noted on paperwork. Also any AC member regularly involved in Recruiting, or any member of the Executive Team involved in recruiting, must keep the Safer Recruitment Training up to date)</i></p> <p>Safer Recruitment Training – every 3 years</p> <p>Equality and Diversity – every 2 years</p>
<p>DSL DDSL</p> <p>In addition, 1 x SLT member (secondary level) In addition to all staff</p>	<p><u>EduCare Courses:</u> Child Protection in Education</p> <p>The Prevent Duty</p> <p>Online Safety</p> <p>Understanding the Role of the Safeguarding Lead</p> <p>Equality and Diversity</p> <p><u>Optional Recommended Courses:</u></p> <p>Child missing in education</p> <p>Child sexual exploitation</p> <p>Mental Wellbeing in Child Protection</p> <p>Sexual violence and Harassment between Children and Young People</p> <p>FGM</p> <p>LA or Andrew Hall DSL training</p>	<p><u>EduCare Courses:</u> Child Protection in Education Refresher annually within first two weeks of term</p> <p>Full Child Protection in Education – every 2 years</p> <p>The Prevent Duty – every 3 years</p> <p>Online Safety – every 2 years</p> <p>Equality and Diversity – every 3 years</p> <p>Any relevant training offered by their local partnership either through network meetings or specific contextual safeguarding training to the locality</p> <p>Read and understand all updates that are sent through from Head of Safeguarding</p>

	Read and understand KCSiE in full	
SENDCo, Designated LAC lead, Mental Health Lead Note this training is in addition to the training as staff	Read and understand KCSiE, in full	<u>Read and understand (within two weeks of the start of term):</u> KCSiE, in full.
Primary Principals (if not DSL / DDSL) Note this training is in addition to the training as staff	<u>EduCare Courses:</u> Child Protection in Education The Prevent Duty Understanding the Role of the Safeguarding Lead Managing Allegations against Staff Safer Recruitment Training Equality and Diversity FGM Online safety <u>Optional Recommended Courses:</u> Child missing in education Child sexual exploitation Mental Wellbeing in Child Protection Sexual violence and Harassment between Children and Young People	<u>EduCare Courses:</u> Child Protection in Education Refresher annually within first two weeks of term Full Child Protection in Education – every 2 years The Prevent Duty – every 3 years Safer Recruitment Training – every 3 years Equality and Diversity – every 3 Years Online Safety – every 2 years
Secondary Principals (if not DSL/DDSL) (in addition to all staff)	<u>EduCare Courses:</u> Child Protection in Education The Prevent Duty Understanding the Role of the Safeguarding Lead Managing Allegations against Staff Safer Recruitment Training Equality and Diversity FGM Online safety <u>Optional Recommended Courses:</u> Child missing in education	<u>EduCare Courses:</u> Child Protection in Education Refresher annually within first two weeks of term Full Child Protection in Education – every 2 years The Prevent Duty – every 3 years Safer Recruitment Training – every 3 years Equality and Diversity – every 3 Years

	<p>Child sexual exploitation</p> <p>Mental Wellbeing in Child Protection</p> <p>Sexual violence and Harassment between Children and Young People</p>	
<p>Academy Committee</p> <p>AC Safeguarding Lead</p> <p>The Trust Board</p>	<p><u>EduCare Courses:</u> Child Protection in Education</p> <p>Recommended Equality and Diversity Read and understood:-</p> <p>The model Child Protection and Safeguarding Policy</p> <p>The staff Code of Conduct</p> <p>The role of the DSL in any of the Academies (explained by DSL)</p> <p>Section 1 and Appendix A of Keeping Children Safe in Education. (complete Educare questionnaire) Excalibur Code of Conduct for Directors and local governors</p> <p>All of above and The Governance of Safeguarding Module - Educare</p> <p><u>EduCare Courses:</u> Child Protection in Education</p> <p>Recommended Equality and Diversity Read and understood:-</p> <p>The model Child Protection and Safeguarding Policy</p> <p>The staff Code of Conduct</p> <p>The role of the DSL in any of the academies</p> <p>Section 1 and Appendix A of Keeping Children Safe in Education.</p> <p>Excalibur Code of Conduct for Directors and local governors</p> <p>All of above</p>	<p><u>EduCare Courses:</u> Child Protection Refresher every year</p> <p>Recommended Equality and Diversity – every 3 years</p> <p>Read and understood:-</p> <p>The model Child Protection and Safeguarding Policy</p> <p>The staff Code of Conduct</p> <p>The role of the DSL in any of the Academies (explained by DSL)</p> <p>Section 1 and Appendix A of Keeping Children Safe in Education. (complete Educare questionnaire)</p> <p>Excalibur Code of Conduct for Directors and local governors</p> <p>All of above and Child Protection Education and Governance of Safeguarding – every 2 years</p> <p><u>EduCare Courses:</u> Child Protection Refresher every year</p> <p>Recommended Equality and Diversity – every 3 years</p> <p>Read and understood:-</p> <p>The model Child Protection and Safeguarding Policy</p> <p>The staff Code of Conduct</p> <p>The role of the DSL in any of the academies</p> <p>Section 1 and Appendix A of Keeping Children Safe in Education.</p> <p>Excalibur Code of Conduct for Directors and local governors</p>

<p>The Board Safeguarding Lead</p> <p>Clerk to Academy Committee/Board</p>	<p>Equality and Diversity (Educare) Preventy Duty (Educare)</p> <p>The Browne Jacobson course found at Training for Lead Safeguarding AC members and Trustees (brownejacobson.com)</p> <p>Child Protection in Education Equality and Diversity</p>	<p>Child Protection refresher every year Equality and Diversity every 3 years Prevent Duty every 3 years</p> <p>Child Protection refresher every year Equality and Diversity every 3 years</p>
<p>Executive Team (in addition to their role as staff)</p>	<p>The Head of Safeguarding will take the following EduCare courses:</p> <p>Prevent Training Child Exploitation Training Sexual Violence and Harassment between Children and Young People Safer Recruitment Online Safety Mental Wellbeing in Child Protection</p>	<p><u>EduCare Courses:</u> Child Protection in Education – every 2 years</p> <p>In addition the Head of Safeguarding will take the following EduCare courses – every 2 years: Prevent Training Child Exploitation Training Sexual Violence and Harassment between Children and Young People Safer Recruitment Online Safety Mental Wellbeing in Child Protection</p>

Staff will sign to state they have completed the training along with other matters. This sign off will be provided by Head of HR for all academies and the Central Team.

The individual academies need to chase up any staff who have not completed the training and ensure that staff completing the training is recorded on the SCR. Head of HR will do the same for the central team in the Trust.

The academies can add any training they have identified as a need through auditing or review.

If any staff are missing from the first INSET day briefing this needs to be followed up within the first two weeks of term to ensure they have accessed the briefing (recording the briefing and giving access on Teams would be one solution to this ensuring DSL time is not spent on this).

Each Trustee of the Board and the Academy Committee in each academy will complete the Child Protection Refresher via EduCare by 20th October every year. This course will be allocated to them by the Head of HR for the Trust Board (who will inform the Head of Governance) and the DSL for each Academy Committee (who will inform the clerk to the Academy Committee). It is also the persons' responsibility who assigned the course to ensure that members have completed the training by the given date.

The Academy Committee Safeguarding Lead will be allocated their training by the DSL for their own academy. The Head of HR will allocate the training for the Board Safeguarding Lead and the Executive Team and training is to be recorded on the SCR.

Recording and evaluating safeguarding CPD

It is statutory to record the training that staff have had, and to ensure that staff who have missed these opportunities are able to have this learning covered. Today's safeguarding CPD guidance stresses the development of a wide-range of knowledge and skills, cannot

be simply “delivered” in a short amount of time. Safeguarding CPD is an ongoing process, so rather than keep a register of attendance, it would be far more effective for staff to build a portfolio around their deepening safeguarding knowledge and EduCare allows them to do this online. EduCare also is able to evaluate the understanding of the individual and what they have learnt.

Academies still must register training on the SCR, but this is easily done as EduCare can be accessed by your academy to see the training completed by your staff and the dates it was completed.

Lastly it is about effective CPD. How as an academy, do you know the safeguarding CPD has been **effective?** Consider building evidence for this, safeguarding learning walks for example. As well as analysis of the data around safeguarding including bullying, exclusions etc.

How to allocate training can be found in the EduCare Admin User Guide available on the Excalibur SharePoint site.

Staff with a service level agreement, contractor or supply teacher/temporary support staff

It is essential that academies have confirmation from the primary employer that these staff have had basic child protection training and have read Section 1 and Appendix A of the Keeping Children Safe in Education legislation. This needs to be recorded on the SCR. A DBS check is not enough. They need to be aware of the academy child protection policy, staff code of conduct and the role of the DSL in the academy.

Supervision

There is a clear supervision policy and practice in place for DSLs. DSLs support each other and are trained in supervision. Each DSL is offered supervision every 6 weeks and can contact either their supervisor or the Head of Safeguarding at any other time for advice or guidance.

There is a supervision policy and practice for EYFS staff in place for the Trust and all academies with EYFS must follow it.

It is the responsibility of the Principals to ensure time is available for supervising and supervision of staff.

Establishing Good Practice: Minimising Vulnerability to Allegations

All academies should ensure that ALL staff are aware of this good practice and it is referred to on a regular basis and this advice is displayed within the staffroom.

Always:

- ✓ Work in an open environment. Avoid private or out of sight locations and encourage open communication.
- ✓ Speak clearly, without whispering, so that students do not need to come close to hear.
- ✓ Avoid spending time alone with individual students away from others
- ✓ Treat all students, regardless of race, disability, religion or belief, gender, sexual orientation, equally and with respect and dignity.
- ✓ Ensure the student's welfare comes first and record it.
- ✓ Be aware of the impact of proxemics; maintain safe and appropriate distances; know where and how to place your body.
- ✓ Avoid touching students, but where **educationally necessary** staff should follow these guidelines:
 - try to demonstrate without touching first
 - ask permission; say what you intend to do first and explain why
 - if a pupil seems uncomfortable; stop
 - only touch hands, arms or shoulder nearest you (don't reach across the body)
 - be aware of overall proximity; maintain physical space; don't stand behind
 - inappropriate areas for touch include chest, diaphragm, waist, thighs
- ✓ move away as soon as the contact is no longer required
- ✓ Maintain professional boundaries, perhaps using a specific mobile number or email address for work purposes, rather than sharing personal details.
- ✓ Present as an exemplary role model by not smoking or drinking alcohol, swearing, allowing suggestive conversations or jokes or wearing less than professional clothing when in the company of a student.
- ✓ Seek to be enthusiastic and constructive when giving feedback rather than making negative or critical remarks.
- ✓ Record any injury that occurs and seek attention from a qualified First Aider.
- ✓ Record any incident of concern involving student's welfare.
- ✓ Follow the Excalibur Restraint Policy if and when needed.

Never:

- ✗ Allow allegations made by a child to go unchallenged, unrecorded or not acted upon (this applies to any form of abuse or bullying).
- ✗ Lock doors, cover windows or use "Do Not Disturb" signs.

- ✘ Impose humiliating or power-based punishments on a student or reduce a child to tears.
- ✘ Engage in rough, physical or sexually provocative games, including horseplay.
- ✘ Allow or engage in any form of inappropriate touching.
- ✘ Share a bedroom with a child on an academy trip.
- ✘ Allow children to use inappropriate language unchallenged.
- ✘ Make sexually suggestive comments or "jokes" to a child, even in fun.
- ✘ Engage in any form of relationship, sexual or otherwise, with a young person you work with even if they are over the age of consent, but under 18 (older with vulnerable adults).
- ✘ Do things of a personal or intimate nature for children or disabled young people that they can do for themselves.
- ✘ Invite or allow children to stay with you at your home unsupervised.
- ✘ "Friend" a child on their social media or yours; social media can blur boundaries.
- ✘ Take photographs or videos of children unless written/signed consent has been obtained from a parent/carer; this includes the use of phones.
- ✘ Seek physical contact. Try to gently discourage contact, rather than reject students. Model appropriate contact e.g. shaking hands or patting the shoulder. Never allow physical contact when you are alone.
- ✘ Take a child in your car, but where this is unavoidable,
 - Ensure that a manager has agreed in advance
 - Prepare a risk assessment
 - Ensure the vehicle is roadworthy and insurance covers business use
 - Obtain parental permission, preferably in writing
 - Take more than one person
 - Sit child in the back
 - Travel directly to the destination
 - Keep conversation professional

Low level concerns about staff

Low level concerns are not insignificant, they are concerns about a person's behaviour that might not meet the threshold for an "allegation" which would need to be referred to the LADO/DOFA. Any concerns must be referred to the Principal. Our academies must follow the Excalibur Low Level Concerns Policy. All low level concerns should be recorded on the spreadsheet that has been provided by HR.

Low level concerns include behaviours or working practices that are inconsistent with the staff code of conduct, including inappropriate conduct outside of work. These behaviours include:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phones.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating or offensive language.

It is important then that the staff code of conduct is clear and that there is effective induction into the academy, so that all staff understand the expectations. Where there are breaches of the code of conduct, the behaviour policy or safeguarding policy appropriate action should be taken in a timely manner. This should also prompt a review of the policy which may need strengthening or clarifying.

Academy leaders should endeavour to create an academy culture of "openness, trust and transparency", so that staff are empowered to identify concerning, problematic or inappropriate behaviour.

Staff and Social Media

Social media has provided an unprecedented opportunity to connect with other people, in the local community and across the world; with people we know well and those we have never met. Whilst this can be very positive, there are also many potential negative aspects. One negative is the ease with which it is possible for young people to receive unwanted and potentially dangerous contacts.

Academies and colleges are being really creative in the use of social media for communication across the academy and for teaching and learning. However, this must be undertaken carefully and part of a planned process that considers the safeguarding risks involved.

Staff must **not** follow students on Facebook or vice versa; students should be made aware of this. IT systems such as ClassDojo or Show my Homework or similar platforms are the only way that staff should have access to communication with students and these need to be monitored.

Professionalism

All staff who use social media must ensure that their professional reputation (and that of their academy or college) is kept appropriate at all times. Whilst it is possible to use privacy

settings to control who sees their account, it is remarkably easy for these settings to be altered and inappropriate content leaked.

Staff should not breach any confidentiality by sharing images or information about the academy, college, staff or students.

Connecting with parents

Whilst less obviously a safeguarding risk, connecting with parents on personal social media blurs professional boundaries and is to be discouraged.

Managing Allegations against staff

Allegations and complaints against staff can be minimised by having:

- Safer Recruitment strategies in place
- Appropriate induction and training
- Open and transparent safeguarding ethos
- Professional code of conduct
- Regular briefing and discussion of safeguarding issues
- Ensuring that children are aware of safeguarding issues through the curriculum e.g. PSHE

An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in such a way that indicates he or she would pose a risk of harm if they worked regularly or closely with a child.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (incident does not necessarily involve a child, for example, domestic abuse).

This applies to any child the member of staff/volunteer has contact with in their personal, professional or community life. **All allegations against a member of staff that meet the threshold of the four bullet points above must be referred to the LADO/DOFA or if you have any concerns.** Do contact the Head of HR or Head of Safeguarding to discuss if you are unsure.

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

Allegations against a teacher who is no longer teaching and historical allegations of abuse **MUST** be referred to the police. The Principal must refer any matter to the Head of HR in these circumstances and discuss.

The Trust will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

When an allegation is received:

- Take the matter seriously and keep an open mind.
- Do not investigate.
- Do not promise confidentiality to the informant.
- Make a written record of the allegation using the informant's words (including time, date and place where the alleged incident took place, what was said and anyone else present, sign and date).
- If the concerns are about the Headteacher/Principal, then the Head of HR and the CEO should be informed.

- The Designated Safeguarding Officer or Headteacher/Principal must immediately contact the Local Authority Designated Officer(s) LADO/DOFA and the Head of HR for the Trust copying in the Head of Safeguarding.
- Decisions must not be made without discussion with the LADO/DOFA
- Make a written record of discussions with LADO/DOFA and others.
- Make sure LADO/DOFA has full details of the person against whom a concern has been raised and the person who is the subject of the concern.
- Keep the Head of HR and Head of Safeguarding updated regarding the process of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement and in line with the Employment Manual.

Suspension of the accused until the case is resolved

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, the Trust will only suspend an individual if the Trust have considered all other options available and there is no reasonable alternative (in consultation with the Head of HR).

- Based on an assessment of risk, the Trust will consider alternatives such as:
- Redeployment within the academy so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the academy so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative academy or other work for the Excalibur Academy Trust.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation which meets the criteria above, the Principal (or chair of AC members (where the Principal is the subject of the allegation) acting as the 'case manager', will take the following steps:

1. Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
2. Immediately discuss the allegation with the Head of HR and outline the steps to be taken by the Trust.
3. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer and Head of HR (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
4. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, Head of HR, police and/or children's social care services, as appropriate
5. If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer and the Head of HR. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the academy and their contact details.
6. If it is decided that no further action is to be taken regarding the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer and Head of HR what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
7. If it is decided that further action is needed, take steps as agreed with the designated officer and Head of HR to initiate the appropriate action in academy and/or liaise with the police and/or children's social care services as appropriate.
8. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Delegated Services provide support as would a trade union rep.
9. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

10. Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
11. Make a referral to the DBS via the Head of HR where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
12. Early Years providers will inform Ofsted of any allegations of serious harm or abuse by any person living/working with, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
13. If the academy is made aware that the secretary of state has made an interim prohibition order in respect of an individual, the Trust will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
14. Where the police are involved, wherever possible Excalibur Academies Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the academy's disciplinary process, should this be required at a later point.

Additional considerations for supply staff

Please note that the Employment Manual takes a broad approach to the meaning of 'staff' and therefore key policies on conduct will also apply to supply staff. For clarity these will include The Dignity at Work Policy, Code of Conduct, Anti-bribery and Corruption Policy, Health and Safety at Work Rules, Disciplinary Rules, Whistleblowing Policy, IT Acceptable Use Policy, Social Media Policy, Communications Policy and Smoking, Alcohol and Drugs Policy. Any concerns against any member of supply staff should be escalated in accordance with the appropriate policy.

Allegations of a safeguarding nature should therefore be dealt with in the same way as allegations against other staff and the Trust may therefore also need to liaise with the supply agency who supplied the member of staff. If there are concerns or an allegation is made against someone not directly employed by the academy, such as supply staff provided by an agency, the academy will take the actions below in addition to our standard procedures.

- The academy will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer and Head of HR to determine a suitable outcome.
- The Head of HR will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the academy, while the academy carries out the investigation.
- The academy will involve the agency fully, but the academy will take the lead in collecting the necessary information and providing it to the local authority designated officer as required.
- The academy will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (the academy will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

- When using an agency, the academy will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, the academy will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, the academy will hold this within 15 working days.

Specific actions

Action following a criminal investigation or prosecution:

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services. The Head of HR will be included in this discussion.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the academy's personnel adviser will discuss with the designated officer and the Head of HR whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS. **This is a legal duty and failure to refer when the criteria are met is a criminal offence.**

If the individual concerned is a member of teaching staff, the case manager and Head of HR will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the academy.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Principal, or other appropriate person in the case of an allegation against the Principal, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, Head of HR, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the academy will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, the Trust will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. The Trust will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, the academy/Trust will not refer to any allegation which has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are substantiated, the academy will review the circumstances of the case with the local authority's designated officer and Head of HR to determine whether there are any improvements that the academy can make to the academy's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. The academy will consider how future investigations of a similar nature could be carried out without suspending the individual.

Safeguarding for visitors and volunteers

Visitors

- All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings in a safe place during their visit. Academies should endeavour to have an electronic visitor sign in system and use this rather than paper based option.
- If the visitor is unknown to the setting, check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
- Visitors are expected to sign using the electronic system and wear a visitor's badge and are provided with key safeguarding information including the contact details of safeguarding personnel in academy. Academies to use the information leaflet as model that is to be found on the safeguarding SharePoint site.
- Visitors to the academy who are visiting for a professional purpose, such as educational psychologists and academy improvement officers, will be asked to show photo ID and,
- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out. Self-employed visitors must show a DBS.
- All other visitors, including visiting speakers, will always accompanied by a member of staff. The academy will not invite into the academy any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using academy facilities is not seeking to disseminate extremist views or radicalise pupils or staff. All speakers or workshop leaders must be social media and google checked to ensure there are no issues around their organisation.
- All regular visitors will be asked to provide proof of up-to-date Child Protection Training and if this is not available will be required to complete EduCare Child Protection Training.

Volunteers

- No volunteers on whom no checks have been obtained will be left unsupervised or allowed to work in regulated activity.
- The academy will undertake a risk assessment and use their professional judgement and experience when deciding what checks, if any, are required.
- The risk assessment should consider:

- The nature of the work with children, especially if it will constitute regulated activity, including the level of supervision.
 - What the academy knows about the volunteer, including formal and informal information offered by staff, parents and other volunteers.
 - Whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability.
 - Where the role is eligible for a DBS check, what level is appropriate.
- Details of the risk assessment should be recorded.
 - The academy will obtain an enhanced DBS check (which should include children's barred list information) for all volunteers who are new to working with regulated activity with children
 - All volunteers if volunteering on a regular basis will be required to provide proof of up-to-date Child Protection Training and if not able to provide this will complete EduCare Child Protection in Education Training.

Safeguarding practice regarding students not on site

Pupils working in alternative provision settings

Where an academy places a pupil with an alternative provision provider, they will obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that the academy would otherwise perform. It is also good practice to complete a risk assessment and ensure that the academy has checked safeguarding policy of the alternative provision provider. It is important that termly visits are conducted to the alternative provision to ensure that it is meeting expectations regarding safeguarding.

Adults who supervise pupils on work experience

When organising work experience, academies will ensure that policies and procedures are in place to protect children from harm.

Academies will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Off Site visits and exchange visits

The academy will carry out risk assessments prior to any off-site visit and designate the specific roles and responsibilities of each adult, whether employed or volunteers.

Where there are safeguarding concerns or allegations that happen offsite, staff will follow the procedures described in the appendices.

Any adult over 18 in a host family will be subject to DBS checks. The academy will work with partner academies abroad to ensure that similar assurances are undertaken prior to any overseas visit by our pupils.

Pupils staying with host families

Where the academy makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people. Where the academy is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner academies abroad to ensure that similar assurances are undertaken prior to the visit.

Use of academy premises for non-academy activities

The academy ensures that when it hires out academy facilities to organisations or individuals (for example community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe this applies even if no children from the academy are participating.

The academy ensures that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these) and ensure that there are arrangements in place to liaise with the academy on these matters where appropriate.

The academy will ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises, and any failure to comply with this would lead to termination of the agreement.

The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO

Online Safety

See also Excalibur Online Safety Policy.

All academies must have their own contextualised online safety policy. All academies must have a SWGFL 360 online safety tool in place being regularly reviewed.

Online safety concerns the safe use of technology, most notably the internet and social media. Many adults are less familiar with IT than children and young people and it is partly this knowledge gap that can place pupils at risk.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. All academies must ensure online safety is a running and interrelated theme whilst devising and implementing procedures and policies.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example; pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact:** being subjected to harmful online interaction with other users; for example: child to child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increase the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying,) and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and or financial scams. The academy will report any concerns to the Anti-Phishing Working Group (<https://apwg.org/>)

All academies will carry out an annual review of their approach to online safety and this will be completed by April each academic year. This will be sent to the Head of Safeguarding. The review that will be used will be from SWGFL 360 online safety assessment.

Staff and mobile phones

Staff are allowed to bring their personal phones to academy for their own use, but must limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. All academies must ensure their staff are aware of this and are reminded of this on a regular basis.

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

All academies will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the academy.

Teaching online safety in school (DfE, June 2019)

To help schools consider the breadth of safeguarding concerns the government published a guidance document 'Teaching online safety in school (DfE, June 2019). It outlines to

schools the importance of helping children and young people not only use the internet safely, but also give them opportunities to learn how to behave online. Throughout, the guidance emphasises the importance of teaching that is always age and developmentally appropriate. All academies must ensure that their curriculum teaches explicitly about online safety and that students understanding is regularly reviewed.

The guidance is non-statutory and applies to all local authority maintained schools, academies and free schools. The advice may also be helpful to nurseries and FE colleges.

Teaching online safety in school should be read in conjunction with Education for a Connected World Framework (UKCIS, 2018) which offers 'age specific advice about the online knowledge and skills that pupils should have the opportunity to develop at different stages of their lives.'

Education for a Connected World Framework (UKCIS, 2020)

Teaching online safety in school should be read in conjunction with Education for a Connected World Framework (UKCIS, 2020) which offers 'age specific advice about the online knowledge and skills that pupils should have the opportunity to develop at different stages of their lives.'

The Framework focuses on eight aspects of online education:

1. Self-image and identity
2. Online relationships
3. Online reputation
4. Online bullying
5. Managing online information
6. Health, wellbeing and lifestyle
7. Privacy and security
8. Copyright and ownership

Although the Teaching online safety in school guidance says that it does not imply additional content or teaching requirements, schools should review their curriculum to ensure that all aspects are covered; and to find out whether staff are confidently understanding the risks too.

The document says that there are many areas in the curriculum where the topics could be taught, not least in the compulsory Relationships (Sex Education) and Health Education in place from September 2020. In these curriculum areas, pupils will be taught what positive, healthy and respectful online relationships look like.

The guidance includes the following underpinning knowledge and behaviours:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Online behaviour
- How to identify online risks
- How and when to seek support

Although the nature of online harms has been considered some time, it is not until we look through the comprehensive risks listed in this document that they together they reflect how harmful the internet might be. It is easy to see the potential harms, but it is important that

academies communicate them in a safe and beneficial way, so that pupils remain respectfully cautious and not fearful.

Potential Harms covered in the guidance includes:

- Age restrictions
- Content: How it can be used and shared
- Disinformation, misinformation and hoaxes
- Fake websites and scam emails
- Fraud (online)
- Password phishing
- Personal data
- Persuasive design which keeps 'users online for longer than they might have planned or desired'
- Privacy settings
- Targeting of online content
- Abuse (online)
- Challenges (to do something and post about it)
- Content which incites...hate, violence
- Fake profiles
- Grooming
- Live streaming
- Pornography
- Unsafe communication
- Impact on confidence (including body confidence)
- Impact on the quality of life, physical and mental health and relationships
- Online vs. Offline behaviours
- Reputational damage
- Suicide, self-harm and eating disorders

The Teaching online safety in school guidance, reminds schools that when teaching about these safeguarding topics (and others), staff should be mindful that there may be a child or young person in the lesson who is or has been affected by these harms. During or after a lesson, a pupil may be prompted to disclose about something that may have happened online.

The guidance says that it is good practice to consult the Designated Safeguarding Lead 'when considering and planning any safeguarding related lessons or activities (including online) as they will be best placed to reflect and advise on any known safeguarding cases, and how to support any pupils who may be especially impacted by a lesson'.

The Teaching online safety in school guidance emphasises the need for a whole academy approach so that it is embedded in everything the academy does including:

- Creating a culture that incorporates the principles of online safety across all elements of school life
- Proactively engaging staff, pupils and parents/carers
- Reviewing and maintaining the online safety principles
- Embedding the online safety principles
- Modelling the online safety principles consistently

Documents

Teaching online safety in school (DfE 2019)

Education for a Connected World (UKCIS, 2020)

Useful websites for online safety include:

UK Council for Internet Safety (UKCIS) - www.education.gov.uk/ukccis

Child Exploitation and Online Protection Centre (CEOP) - www.ceop.police.uk

Think U Know – www.thinkuknow.co.uk

UK Safer Internet Centre – www.saferinternet.org.uk

SWGfL (South West Grid for Learning) - <http://www.swgfl.org.uk>

London Grid for Learning – <https://lgfl.net/online-safety/>

The UK Safer Internet Centre runs a helpline for professionals working with children and young people.

The Professionals Online Safety Helpline

Email helpline@saferinternet.org.uk or call 0844 3814772 (10am – 4pm)

Filtering and monitoring standards for schools and colleges

The following are the standards your academy should meet on filtering and monitoring.

Academies should provide a safe environment to learn and work, including when online.

Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.

Clear roles, responsibilities and strategies are vital for delivering and maintaining effective filtering and monitoring systems. It's important that the right people are working together and using their professional expertise to make informed decisions.

How to meet the standard

Academy committees and Trustees have overall strategic responsibility for filtering and monitoring and need assurance that the standards are being met.

To do this, they should identify and assign:

- a member of the senior leadership team and a governor, to be responsible for ensuring these standards are met
- the roles and responsibilities of staff and third parties, for example, external service providers

We are aware that there may not be full-time staff for each of these roles and responsibility may lie as part of a wider role within the academy or Trust. However, it must be clear who is responsible and it must be possible to make prompt changes to your provision.

Technical requirements to meet the standard

The senior leadership team working with the Trust IT lead are responsible for:

- procuring filtering and monitoring systems
- documenting decisions on what is blocked or allowed and why
- reviewing the effectiveness of your provision
- overseeing reports

They are also responsible for making sure that all staff:

- understand their role
- are appropriately trained
- follow policies, processes and procedures
- act on reports and concerns

Senior leaders should work closely with the Trust, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring. Your IT service provider may be a staff technician or an external service provider.

Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL should work closely together with IT service providers to meet the needs of your setting. You may need to ask filtering or monitoring providers for system specific training and support.

The DSL should take lead responsibility for safeguarding and online safety, which could include overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

The IT service provider should have technical responsibility for:

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports
- completing actions following concerns or checks to systems

The IT service provider should work with the senior leadership team and DSL to:

- procure systems
- identify risk
- carry out reviews
- carry out checks

You should review your filtering and monitoring provision at least annually. For filtering and monitoring to be effective it should meet the needs of your pupils and staff, and reflect your specific use of technology while minimising potential harms.

To understand and evaluate the changing needs and potential risks of your academy, you should review your filtering and monitoring provision, at least annually.

Additional checks to filtering and monitoring need to be informed by the review process so that academy committees and the Trust have assurance that systems are working effectively and meeting safeguarding obligations.

How to meet the standard

Academies and Trustees have overall strategic responsibility for meeting this standard. They should make sure that filtering and monitoring provision is reviewed, which can be part of a wider online safety review, at least annually.

The review should be conducted by members of the senior leadership team, the designated safeguarding lead (DSL), and the IT service provider. The results of the online safety review should be recorded for reference and made available to those entitled to inspect that information.

Your IT service provider may be a staff technician or an external service provider.

Technical requirements to meet the standard

A review of filtering and monitoring should be carried out to identify your current provision, any gaps, and the specific needs of your pupils and staff.

You need to understand:

- the risk profile of your pupils, including their age range, pupils with special educational needs and disability (SEND), pupils with English as an additional language (EAL)
- what your filtering system currently blocks or allows and why
- any outside safeguarding influences, such as county lines
- any relevant safeguarding reports
- the digital resilience of your pupils
- teaching requirements, for example, your RHSE and PSHE curriculum
- the specific use of your chosen technologies, including Bring Your Own Device (BYOD)
- what related safeguarding or technology policies you have in place
- what checks are currently taking place and how resulting actions are handled

To make your filtering and monitoring provision effective, your review should inform:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked
- monitoring strategies

The review should be done as a minimum annually, or when:

- a safeguarding risk is identified
- there is a change in working practice, like remote access or BYOD
- new technology is introduced

There are templates and advice in the reviewing online safety section of [Keeping children safe in education](#) but the Trust uses the 360 SWGFL model.

Checks to your filtering provision need to be completed and recorded as part of your filtering and monitoring review process. How often the checks take place should be based on your context, the risks highlighted in your filtering and monitoring review, and any other risk assessments. Checks should be undertaken from both a safeguarding and IT perspective.

When checking filtering and monitoring systems you should make sure that the system setup has not changed or been deactivated. The checks should include a range of:

- academy owned devices and services, including those used off site
- geographical areas across the site
- user groups, for example, teachers, pupils and guests

You should keep a log of your checks so they can be reviewed. You should record:

- when the checks took place
- who did the check
- what they tested or checked
- resulting actions

You should make sure that:

- all staff know how to report and record concerns
- filtering and monitoring systems work on new devices and services before releasing them to staff and pupils
- blocklists are reviewed and they can be modified in line with changes to safeguarding risks

You can use South West Grid for Learning's (SWGfL) [testing tool](#) to check that your filtering system is blocking access to:

- illegal child sexual abuse material
- unlawful terrorist content
- adult content

Your filtering system should block harmful and inappropriate content, without unreasonably impacting teaching and learning.

The importance of meeting the standard

An active and well managed filtering system is an important part of providing a safe environment for pupils to learn.

No filtering system can be 100% effective. You need to understand the coverage of your filtering system, any limitations it has, and mitigate accordingly to minimise harm and meet your statutory requirements in [Keeping children safe in education](#) (KCSIE) and the [Prevent duty](#).

An effective filtering system needs to block internet access to harmful sites and inappropriate content. It should not:

- unreasonably impact teaching and learning or school administration
- restrict students from learning how to assess and manage risk themselves

How to meet the standard

The Trust will support the senior leadership team to procure and set up systems which meet this standard and the risk profile of the academy.

Management of filtering systems requires the specialist knowledge of both safeguarding and IT staff to be effective. You may need to ask your filtering provider for system specific training and support.

Technical requirements to meet the standard

Make sure your filtering provider is:

- a member of [Internet Watch Foundation](#) (IWF)
- signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
- blocking access to illegal content including child sexual abuse material (CSAM)

If the filtering provision is procured with a broadband service, make sure it meets the needs of your school or college.

Your filtering system should be operational, up to date and applied to all:

- users, including guest accounts
- school owned devices
- devices using the school broadband connection

Your filtering system should:

- filter all internet feeds, including any backup connections
- be age and ability appropriate for the users, and be suitable for educational settings
- handle multilingual web content, images, common misspellings and abbreviations
- identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them
- provide alerts when any web content has been blocked

Mobile and app content is often presented in a different way to web browser content. If your users access content in this way, you should get confirmation from your provider as to whether they can provide filtering on mobile or app technologies. A technical monitoring system should be applied to devices using mobile or app content to reduce the risk of harm.

It is important to be able to identify individuals who might be trying to access unsuitable or illegal material so they can be supported by appropriate staff, such as the senior leadership team or the designated safeguarding lead.

Your filtering systems should allow you to identify:

- device name or ID, IP address, and where possible, the individual
- the time and date of attempted access
- the search term or content being blocked

Academies will need to conduct their own data protection impact assessment (DPIA) and review the privacy notices of third party providers. [A DPIA template](#) is available from the ICO.

[The DfE data protection toolkit](#) includes guidance on privacy notices and DPIAs.

The UK Safer Internet Centre has guidance on establishing [appropriate filtering](#).

Your senior leadership team may decide to enforce Safe Search, or a child friendly search engine or tools, to provide an additional level of protection for your users on top of the filtering service.

All staff need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:

- they witness or suspect unsuitable material has been accessed
- they can access unsuitable material
- they are teaching topics which could create unusual activity on the filtering logs
- there is failure in the software or abuse of the system
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
- they notice abbreviations or misspellings that allow access to restricted material

Dependencies to the standard

Check that you meet:

- [Broadband internet standards](#)
- [Cyber security standards](#)

You should have effective monitoring strategies that meet the safeguarding needs of your school or college,

The importance of meeting the standard

Monitoring user activity on an academy device is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software.

Monitoring allows you to review user activity on an academy device. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.

Your monitoring strategy should be informed by the filtering and monitoring review. A variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

How to meet the standard

The Trust will support the senior leadership team to make sure effective device monitoring is in place which meets this standard and the risk profile of the school or college.

The designated safeguarding lead (DSL) should take lead responsibility for any safeguarding and child protection matters that are picked up through monitoring.

The management of technical monitoring systems require the specialist knowledge of both safeguarding and IT staff to be effective. Training should be provided to make sure their knowledge is current. You may need to ask your monitoring system provider for system specific training and support.

Technical requirements to meet the standard

The Trust support the senior leadership team to review the effectiveness of your monitoring strategies and reporting process. Make sure that incidents are urgently picked up, acted on and outcomes are recorded. Incidents could be of a malicious, technical, or safeguarding nature. It should be clear to all staff how to deal with these incidents and who should lead on any actions.

The UK Safer Internet Centre has guidance for schools and colleges on establishing [appropriate monitoring](#).

Device monitoring can be managed by IT staff or third party providers, who need to:

- make sure monitoring systems are working as expected
- provide reporting on pupil device activity
- receive safeguarding training including online safety
- record and report safeguarding concerns to the DSL

Make sure that:

- monitoring data is received in a format that your staff can understand
- users are identifiable to the academy, so concerns can be traced back to an individual, including guest accounts

If mobile or app technologies are used then you should apply a technical monitoring system to the devices, as your filtering system might not pick up mobile or app content.

In the online safety section of [Keeping children safe in education](#) there is guidance on the 4 areas of risk that users may experience when online. Your monitoring provision should identify and alert you to behaviours associated with them.

Technical monitoring systems do not stop unsafe activities on a device or online. Staff should:

- provide effective supervision
- take steps to maintain awareness of how devices are being used by pupils
- report any safeguarding concerns to the DSL

Academy monitoring procedures need to be reflected in your Acceptable Use Policy and integrated into relevant online safety, safeguarding and organisational policies, such as privacy notices.

Academies that have a technical monitoring system will need to conduct their own data protection impact assessment (DPIA) and review the privacy notices of third party providers. [A DPIA template](#) is available from the ICO.

[The DfE data protection toolkit](#) includes guidance on privacy notices and DPIAs.

Dependencies to the standard

Check that you meet:

- [Cyber security standards](#)

Responding to an online safety incident

Preserve the evidence

If the incident involves the discovery of indecent images or videos of children, the police should always be contacted immediately for advice. The academy must also contact the Head of Safeguarding.

If the incident involves unacceptable, inappropriate or potentially illegal use of a computer, mobile phone or camera, make no-one else comes into contact with the device. Do not shut down a computer, but do turn off the monitor instead. Where possible lock the equipment away.

Seek technical advice.

Consider the impact of the online safety incident

If the incident is solely against the academy's Acceptable Use Policy, consider applying the consequences indicated in that policy or the over-arching behaviour policy.

If the incident is of a potentially criminal nature, the police should be contacted.

If the incident involves an adult, the Local Authority Designated Officer(s) (LADO/DOFA) must be contacted for further advice.

Safeguarding Scheme of Delegation

Area of responsibility	Trust Board	Board Safeguarding Member	Board Committee	Executive Team (HR, Secondary And Primary leads, Head of Safeguarding, Head of IT)	Academy Principal/ delegated to DSL	Academy Committee
Strategic Leadership Responsibility for the Organisations Wider Safeguarding arrangements	Responsible					
Individual with Leadership Responsibility for the Organisation's Safeguarding arrangements		Responsible				
Strategic liaison, reporting and champion		Responsible				
Strategic Requirements knowledge at Board level		Responsible				
Duty knowledge at Board level	Responsible					

Safeguarding and pupil welfare	Monitor		Monitor	Monitor	Responsible	Monitor Safeguarding AC member - knowledge
Allegations of abuse made against other children			Monitor	Monitor	Responsible	
Allegations made against Teachers Including Supply teachers, other staff, volunteers, contractors			Monitor	Monitor and informed	Responsible	
Safe Recruitment procedures			Monitor	Responsible	Responsible	
The Prevent Duty			Monitor	Responsible	Responsible	
Academy Attendance			Monitor	Monitor	Responsible	
Use of Reasonable force			Monitor	Monitor	Responsible	
Academy security				Monitor	Responsible	
Supporting pupils in schools with Additional			Monitor	Monitor	Responsible	

health needs						
Safeguarding policy and handbook	Responsible	Monitor		Responsible to produce	Responsible to locally contextualise	Monitor completed
Policies related To safeguarding I.e restraint, equalities etc			Responsible	Responsible to produce	Responsible To contextualise	
Appoint a DSL on SLT with job description				Monitor	Responsible	
Staff training			Monitor	Responsible for definition Monitor	Responsible	
AC Governor training			Monitor	Responsible for definition Monitor	Responsible	Monitor
Online safety			Monitor	Monitor	Responsible	
Looked after children			Monitor	Monitor	Responsible	
Appoint Safeguarding link AC member		Monitor	Monitor	Monitor	Monitor	Responsible
Safeguarding curriculum			Monitor	Monitor	Responsible	
Single Central Record			Monitor	Monitor	Responsible	
Local Authority Audit			Monitor	Monitor	Responsible	Monitor

Report to Trust – October			Monitor	Responsible	Responsible	Monitor
CPOMs - input and monitoring				Monitor	Responsible	

The Role of the Trust Board

The following outlines the Trust Board role and that of the link board member regarding safeguarding in academies within The Excalibur Academies Trust.

Introduction

Section 175 of the Education Act 2002, and the Education (Independent School Standards) Regulations 2014 place a duty on boards of maintained schools and academy trusts to have arrangements in place to ensure they:

- Carry out their functions with a view to safeguarding and promoting the welfare of children.
- Have regard to the statutory guidance issued by the Secretary of State in considering what arrangements they need to make for the purpose of that section.

The Trust Board must ensure that the Trust and therefore all of its academies are carrying out all of its safeguarding duties, with a view to **safeguarding and promoting the welfare of children**. Keeping Children Safe in Education 2022 sets out that the Trust Board should take **strategic leadership responsibility** for the organisation's wider safeguarding arrangements (and the Prevent Duty should be seen as part of the wider safeguarding obligation).

To help do this effectively, the Trust Board will have an individual to take leadership responsibility for the organisation's safeguarding arrangements, which includes the Prevent Duty (Governance Handbook (DFE 2020)). This board member will champion child protection issues, liaise with head of safeguarding, and report to the Trust board. Everyone on the Board should understand safeguarding, but the safeguarding board member has the detailed knowledge.

The Trust Board must be trained as per the training grid.

The Trust Board has allocated the responsibility of monitoring the safeguarding across the Trust to its Education Scrutiny Committee that will report into the Board on a regular basis.

Aspects of safeguarding the committee will cover (see grid):

The statutory guidance, KCSIE, places requirements on all boards to ensure their academies have effective safeguarding policies and procedures in place which have taken into account local risks, any statutory guidance issued by the Secretary of State, any Local Authority guidance and locally agreed inter-agency procedures.

Key areas for policies and practice to address include:

- Safeguarding policies (model provided by Excalibur to be completed by the academy with specific information)
- The Trust Safeguarding Action Plan
- Academies Safeguarding Reviews
- The role of the Designated Safeguarding Lead (DSL) and Head of Safeguarding
- Inter-agency working
- Staff training
- Online training – via EduCare which is provided by Excalibur
- Opportunities to teach safeguarding
- Allegations of abuse made against teachers, principals, supply teachers, other staff, volunteers and contractors
- Looked after children
- Children with special educational needs and disabilities

The Excalibur Academies Trust Child Protection and Safeguarding policy identifies that:

The Trust's Board of Directors are responsible for ensuring that safeguarding arrangements are fully embedded within each Academy's ethos and reflected in the Academy's day-to-day safeguarding practices.

The Academy Committee's responsibilities in relation to safeguarding

The responsibilities placed on Academy Committees are:

- Ensuring that an effective child protection policy is in place, together with a behaviour policy.
- Appointing a safeguarding link AC member ensuring that they undergo full child protection training every two years (see training grid).
- Prioritising the welfare of children and learners and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Having due regard to the need to prevent people from being drawn into terrorism in accordance with the Counter Terrorism and Security Act 2015 (Prevent Duty).
- Consider the Safeguarding audits of the academy produced for the Trust and for the local authority.

The role of the link AC governor for safeguarding

Duties are summarised below:

- Be the lead person who understands the safeguarding requirements.
- Support the work of the designated the safeguarding lead.
- Meet with the designated safeguarding lead and any other relevant staff as per the calendar.
- Ensure that any safeguarding deficiencies are brought to the attention of the academy committee.
- Ensure that the safeguarding and child protection policy is being followed.

- Ensure DSL reports to the Academy Committee at the intervals set out in the calendar in Appendix 2.
- Support the academy to develop a culture of safeguarding.
- Ensure members of academy committee are fully trained as per the training grid and they themselves have completed all their training.

The safeguarding AC governor should **not** have access to any record keeping such as CPOMs regarding safeguarding. This information remains confidential and can only be presented as data, with names not being disclosed, by the DSL to the safeguarding AC governor.

The role of the safeguarding AC governor is an important one and acts as a conduit between the academy and the academy committee to ensure that the academy is not only compliant but reflects on its practice to develop its ability to keep its pupils safe, now and into the future. Reflection is really key to developing best practice. The more that schools understand their strengths and areas for development the better.

Four key questions for the academy committee to answer confidently, and on an evidential basis, to gauge whether the impact of safeguarding is effective are:

- Are we compliant?
- Are we improving our processes?
- Is there evidence of consistency across the academy?
- Is there evidence of impact? Is our practice improving?

Meeting with the Designated Safeguarding Lead (DSL)

The DSL is the senior academy leader responsible for the effectiveness of safeguarding on a day-to-day basis. The DSL might do much of the child protection work by themselves or may have a few people to help.

The Safeguarding AC governor can fulfil an important critical friend and support role for the DSL. Keeping Children Safe in Education says that DSLs “should be given the time, funding, training, resources and support to (do their job effectively)”. The safeguarding AC governor should be able to periodically check that the DSL feels there are sufficient resources and time, or whether the Academy Committee should be raising a concern.

For safeguarding to be most effective, it is important that the safeguarding AC governor and the DSL work together to ensure that the strategic and the day-to-day work well. The DSL and AC governor should meet together on termly to discuss safeguarding issues. **Appendix 2** provides an example calendar which could be amended to suit individual academies.

Some of the regular topics for meetings might include:

- Data trends including online issues
- New/emerging issues
- Topical items/hot topics
- Vulnerable groups
- Referrals

Finding evidence of impact

Safeguarding covers many different aspects of academy life, and it can be hard to evidence the impact of policies and practice. Effective safeguarding goes beyond compliance statutory requirements and permeates the culture of the academy. Impact can often be best judged by:

- Talking to people about their experiences and their knowledge around how to keep themselves, children and young people safe.
- Data can often be used to quantify impact and to show trends although numbers of child protection incidents in themselves tell us nothing about the quality of arrangements. Data analysis by pupil groups can be particularly useful, particularly in identifying groups that might need greater support or more targeted work.
- Case studies can be used to illustrate the difference a strong safeguarding approach can make.
- Surveys, face-to-face conversations or forums with pupils, parents, staff and AC governors can offer an interesting insight into the success and challenges of providing highly effective safeguarding.

Training

All AC governors and directors need to complete the training as per the grid.

The DSL will attend an Academy Committee meeting to talk through any specific areas of safeguarding pertinent to the individual setting – how to report a concern on a visit etc.

To ensure the Safeguarding AC governor is able to execute the above duties it is important they are trained at a higher level than other AC governors. The Safeguarding AC governor must complete the training as per the training grid.

Safeguarding AC governors are welcome to attend any other training that is offered by LA, Excalibur or NGA. Safeguarding AC governors need to keep a copy of this training and to inform the DSL for it to be recorded on the SCR.

Local Authority Safeguarding Audit of the academy

The local authority of the academy will carry out an Annual Safeguarding Audit. This will usually take place in the Autumn or early Spring terms. The audit is a self-assessment of its own level of preparedness and is used to set an action plan to improve within the year.

The Safeguarding AC governor should take part in discussing the audit with the DSL discuss and the subsequent revision of the academy safeguarding action plan, report this to the Academy Committee and ensure a copy of the audit and local authority feedback and action plan have been sent to the Head of Safeguarding for the Trust by the DSL.

Reporting to the Trust

The local authority audit, action plan and report should be sent to the Head of Safeguarding as soon as complete. In addition to this the Link AC governor must discuss with the DSL the safeguarding audit for EAT which is on the Excalibur Safeguarding Leads SharePoint site. This

needs to be completed by 20th **October** each year alongside the safeguarding data, again the form for this is on the Excalibur Safeguarding Leads SharePoint site. This needs to be completed and sent to the Head of Safeguarding by 20th **October** each year.

These should both be reported to the Academy Committee in the first report to the Academy Committee by the DSL.

Possible questions for AC governors to ask to evaluate whether safeguarding procedures are securely in place:

- Are effective plans in place to ensure that the key safeguarding duties are being undertaken? How does the Governing Body know?
- Has the link AC governor for safeguarding had the necessary training to effectively carry out their role?
- What training have AC governors had to ensure they have the skills and knowledge to effectively evaluate the safeguarding and child protection arrangements in school?
- What are the local risks for children at the academy? Does the safeguarding policy reflect local risks?
- How does the academy ensure that it promotes the well-being of pupils?
- To what extent is this a happy school with a positive learning culture?

PART TWO

Contextual Safeguarding

“As well as threats to the welfare of children from within their families, children may be vulnerable to abuse, or exploitation from outside their families.”

C Firmin, Working Together to Safeguard Children (2018), paragraph 33

Contextual Safeguarding is a conceptual framework for understanding, assessing, and reducing the risk of harm from outside the family home.

Contextual Safeguarding is based on research and extensive trials in multi-agency safeguarding hubs. Information about the research and its practical application can be found at the Contextual Safeguarding network (www.contextualsafeguarding.org.uk). Membership of the network is free and a wealth of resources is available.

Contextual Safeguarding seeks to understand child protection risks from beyond the family. This becomes of increasing importance for adolescents who naturally begin to spend more time out of their home and under the influence of their peers. In the neighbourhood, young people can be negatively affected by a range of risks as they spend more and more time in retail areas, open spaces, and on public transport. Those seeking to safeguard young people therefore need to assess and intervene in these places.

Research shows us that teenagers are influenced more by their peers and wider relationships than their parents and the pervading attitudes and social norms of their social group may be positive or negative. A safe, supportive, and effective peer group will engender positive relationships, whilst negative experiences may lead to violent, coercive, and harmful behaviours.

Contextual Safeguarding extends the capacity to safeguard from the home to the neighbourhood, and other places where teenagers spend their time, including schools and colleges. Contextual Safeguarding theory considers the dynamic “interplay” between the child, family, peers, school and neighbourhood; and the “weight of influence” presented by the attitude of their peers.

For example, while parents, carers and teachers may emphasise the harm from smoking cannabis, the peer group may endemically play down the dangers and illegality and may even imply that members of the group should smoke the drug to be accepted. The influence of the group is greater than that of parents.

Firmin and her colleagues identified four domains that need to be present for Contextual Safeguarding to be effective:

1. Target - prevent, identify, assess, and intervene with the social conditions of abuse
2. Legislation - incorporate extra-familial contexts into child protection frameworks
3. Partnerships - with sectors/individuals responsible for the natural extra-familial contexts
4. Outcome measures - monitor outcomes for success in relation to contextual, as well as individual change

The Contextual Safeguarding system aims to disrupt or limit harmful extra-familial contexts, to reduce the risk of harm. For example, a park as a source of sexual exploitation may have extra lighting installed, bushes cut back and increased police or council patrols. There is an emphasis on everyone working in the neighbourhood to play their part, including street cleaners, bus drivers, and retailers. This contributes to a wider understanding of how the neighbourhood is used in antisocial or unsafe ways.

When schools have concerns about teenagers, they should always consider the wider context and sources of influence on the young person.

Further Information

Contextual Safeguarding: an overview of the operations, strategic and conceptual framework (C. Firmin, University of Bedford, 2017)

Contextual Safeguarding Network www.contextualsafeguarding.org.uk

Child Sexual Exploitation

For detailed guidance see:

Child Sexual Exploitation: definition and guide for practitioners (DFE) (2017)

Child sexual exploitation is a form of child sexual abuse affecting boys and girls. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

Child sexual exploitation may occur without the child being aware of events or understanding that these constitute abuse.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange; all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Definition:

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

Child sexual exploitation: definition and guide for practitioners (DfE) February 2017

Child Sexual Exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds (who can legally consent to have sex) can still be abused even if the sexual activity appears consensual.
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
- Can take place in person or via technology, or a combination of both.
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- May occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example).
- Can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due

to a range of other factors including gender, sexual identify, cognitive ability, physical strength, status, and access to economic or other resources.

Consent

Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation) consent cannot legally be given whatever the age of the child.

Key factor in Child Sexual Exploitation

Child sexual exploitation involves some form of exchange (sexual activity in return for something) between the victim and/or perpetrator or facilitator. Where there is no such exchange, for example, where the gain for the perpetrator is sexual gratification (or the exercise of power or control), this is described as sexual abuse (and not exploitation).

The exchange can include both tangible (such as money, drugs and alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). The receipt of something by a child/young person does not make them any less of a victim.

It is also important to note that the prevention of something negative can also fulfil the definition of exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

Links to other kinds of crime

- Child trafficking
- Domestic abuse
- Sexual violence in intimate relationships
- Grooming (including online grooming)
- Abusive images of children and their distribution
- Drugs-related offences
- Gang-related activity
- Immigration-related offences
- Domestic servitude

Potential Vulnerabilities

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

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status

- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Struggles with sexual identity

Possible indicators of child sexual exploitation

- Acquisition of money, clothes, mobile phones, etc without plausible explanation
- Gang association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

Online Exploitation

All young people are at risk from online exploitation and may be unaware that this is happening. Online exploitation includes the exchange of sexual communication or images and can be particularly challenging to identify and respond to. Children, young people and perpetrators are frequently more familiar with, and spend more time in, these environments than their parents and carers.

Online child sexual exploitation allows perpetrators to initiate contact with multiple potential victims and offers a perception of anonymity. Where exploitation does occur online, the transfer of images can be quickly and easily shared with others which makes it difficult to contain the potential for further abuse.

Children may be perpetrators of abuse

It must be recognised that children may also be perpetrators of abuse, sometimes at the same time as being abused themselves.

Further Information

Child sexual exploitation: definition and guide for practitioners (DfE 2017)
www.safeguardinghandbook.co.uk/cse

County Lines

(Also known as “Criminal Exploitation of Children”)

County lines is the organised criminal distribution of drugs from the big cities into smaller towns and rural areas using children and vulnerable people.

Although cannabis is occasionally linked to the county lines organisations, it is harder drugs that provide the focus: heroin, cocaine, and amphetamines. The county lines gangs use standard business techniques to develop their trade. In a new area, they need to offer discounts, a consistent quality product, and make sure it is reliably delivered. The main county line gangs operate from London and Liverpool, but other groups work out of Bristol, Reading, Birmingham and Manchester. Faces from the cities are not known by police in the quieter areas and can operate more easily, at least for a time.

The influence of county lines is nationwide. Metropolitan Police have found gang members from Islington in 14 different police areas. People from Liverpool have been arrested in Cumbria and Devon. Street gangs managed by elders and ultimately the shadowy organised crime gangs are the hub of county line activity. The further away from the street, the less likely are arrests or attention from the police. It is the so-called soldiers that are forced to “go country”, to distribute and deliver the drugs. The soldiers identify and groom younger boys, often 9 or 10 years old; and there are always others who want to be part of the gang and its allure of ready cash, clothes, cars, and respect. Entry is often by violent initiation.

Girlfriends are pulled into the gang and are often subject to a high level of sexual violence. Others close to the gang members, their families, friends and neighbours – reluctant affiliates – are drawn into the gang’s sphere of influence too.

The boys, typically 15 and 16, but sometimes younger, travel by coach, train and taxi. With only a burner, or disposable phone, often stolen, and a stash of drugs. For the gang’s security each runner only knows one other phone number along the delivery chain.

At first, they might be offered £500 to go missing for a couple of days, but later, it could be two weeks, a month, or even longer. This is a dangerous time, attacks from rival gangs, an everyday struggle to survive, and the potential for arrest. Any lost drugs must be paid for, one way or another. Of course, the drug runner needs a place to stay. And to do this, the gang will take over the home of a vulnerable person, often after following them home. This is known as “cuckooing”. Once in the property, drugs and weapons can be stored there along with a possible venue for dealing drugs and the sexual exploitation of girls and young women.

The vulnerable people whose homes have been taken over in this way are kept compliant by intimidation, violence, and threats that now they are involved, they could be jailed too. The impact on local communities cannot be underestimated. Debt bondage further threatens the vulnerable person and keeps them from reporting the intruders. The vulnerable person is told that drugs or guns are missing, and that they have to pay for them, of course, they can’t, so they have to pay off the debt by abusive or violent methods.

Children most at risk are those with chaotic backgrounds, maybe some previous offending, poor school attenders, and often children who are looked after. Signs that should prompt people to consider a young person’s involvement in county lines include:

- Being found in distant areas
- Unexplained new clothes, money, or phones
- Being associated with older people
- A significant change in behaviour or mental state.

Documents that provide further information and guidance include a detailed briefing document from the National Crime Agency, and Home Office, the County Lines Guidance, published in July 2017.

As part of academy's duty to promote pupils' wellbeing, academies have a role to play in preventing drug misuse as part of our pastoral responsibilities and to support the Government's drug strategy (2010) to provide information, advice and support to pupils via the curriculum

Domestic Abuse

In the year ending March 2020, an estimated 2.3 million adults aged 16 to 74 years experienced domestic abuse in the previous 12 months (1.5 million women and 757,000 men)

Police data shows that an average of two women each week are killed by a partner or ex-partner.

The Domestic Abuse Act 2021 has now come into law. For the first time the definition identifies that children are victims of domestic abuse, if they 'see, hear or experience the effects of the abuse'. The statutory definition now includes not only violence, but also emotional, coercive and controlling behaviour and economic abuse. The definition applies to people over the age of 16.

In the Domestic Abuse definition, 'abusive behaviour' is:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse
- Psychological, emotional or other abuse

The people involved must be 'personally connected':

- Are married to each other
- Are civil partners of each other
- Have agreed to marry one another (whether or not the agreement has been terminated)
- Have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- Are or have been in an intimate personal relationship with each other
- Have, or there has been a time when they each have had, a parental relationship in relation to the same child
- Are relatives

Grooming of children for sexual abuse

Safer recruitment procedures are aimed at preventing people who have harmed children, or may harm children, from working in schools, either as a member of staff or a volunteer. However, academies must also be aware that once people are working in the academy they may go on to abuse children.

The Finklehor Model

David Finklehor is a researcher in understanding child sexual abuse, in particular how adults groom children for abuse. Finklehor's research sets out four pre-conditions of abuse. It is the model of abuse which forms the foundation of Safer Recruitment procedures. Grooming is a gradual process and can take place over a long period of time.

The Four Pre-Conditions:

Stage One – Motivation “Wanting To”

Stage Two – Internal Inhibitors “Conscience”

Stage Three – External Inhibitors “Creating Opportunities”

Stage Four – Overcome Victim Resistance “Getting Away with It”

Stage One – Motivation

The person recognises that they have a sexual interest in children and that they are motivated to act on those feelings. This thinking is reinforced by fantasies.

Stage Two – Internal Inhibitors

The majority of perpetrators recognise that sexual offences against children are wrong, but they are able to rationalise this wrongdoing in some way so that they can override their conscience. The justification of their behaviour may include blaming the victim, denying their abusive conduct, minimising responsibility for their actions, or minimising the harm to the victim.

Stage 3 – External Inhibitors

The opportunity for an offence to occur must be created by the perpetrator. These are not random acts. Potential offenders must place themselves in an environment where they can meet children. Some offenders have chosen to work in schools, so that they can abuse young people. Within the academy context, people who go on to harm children will find opportunities during both school time and out of hours.

Reducing the opportunity to offend in schools and protect children from harm is an important part of a safeguarding policies, including an effective staff code of conduct and creating environmental protections, such as windows in doors.

A significant external inhibitor in schools is the presence of other adults, systems and procedures, so it is important for the potential offender to groom staff (and/or parents) to ensure that they can circumvent any protections around the child, whilst appearing plausible. Many offenders in schools are well-regarded. This increases the likelihood that any children reporting issues will not be believed, and thus there is a greater freedom to create opportunities to groom or offend.

Stage 4 – Overcome Victim Resistance

This is the “offending stage.” There has often been a slow process of developing a trusting relationship. Typically, vulnerable children will be targeted. The offender will often create a “special” relationship involving greater (social) contact, rewards and/or threats, bribes, or “trickery” to behave in increasingly inappropriate ways. The offender will usually aim to maintain the relationship and so continue to harm the child. Offenders may come across as kind to the children, but also show glimpses of anger that serve to intimidate or threaten.

“Grooming” is not a specific form of child sexual exploitation but should be seen as a way in which perpetrators target children and manipulate their environments. It is an approach to exploitation and may be the beginning of a complex process adopted by abusers. Grooming can be defined as developing the trust of a young person or his or her family in order to engage in illegal sexual activity or for others to engage in illegal sexual activity with that child or young person.

Who is at risk?

Those at most risk include:

- Children with disabilities
- Children previously, or currently, abused or maltreated
- Children or families under stress, or with financial pressures, including poverty
- Children who are isolated, perhaps away from home, or socially excluded
- Children whose backgrounds are chaotic or dysfunctional

The signs to be aware of -

Special Attention	Excessive time alone or in private
Confidante	Giving small gifts, money, cards, letters
Social Media	Befriending parents and home visits

Although the signs may be seen as a grooming process, there are legitimate reasons for some of them and so they are only intended as a guide. Transparency in all actions is important.

Whilst there is little reason for children to be “following” staff on their private social media account, schools do use email between staff and students, and sometimes have school social media accounts. In these cases, academies need very clear policies on professional social media use; and should have more than one administrator for the account. Please see the section in the handbook.

In many cases of the sexual abuse of children in schools by staff the work with, other staff have often been distracted by the person's often charismatic or imposing personality. Such offenders will typically be grooming the family too, by getting to know them, stepping over professional boundaries and by making frequent home visits. To counter this possibility, schools should be clear about the purpose of such visits, limit them to relevant staff members and have a professional protocol about behaviour, relationships and recognise the need to record such visits.

Reducing the risk of grooming and abuse by staff

The risk of grooming and sexual abuse of staff can be minimised by creating a strong safeguarding culture and by raising awareness of the potential for harm in the academy itself. An open culture, where staff feel that they can ask questions about the conduct of other adults and speak to relevant academy leaders, including the designated safeguarding lead, headteachers or AC governors.

Safer Recruitment processes must be as effective as possible, and ensure that, as far as possible, the background and motivations of potential employees is checked out. A robust code of professional conduct can make it easier for people to raise concerns and for leaders to take action. Staff who realise that they have inadvertently breached the code, should report the incident to the head. Or ask for permission if the breach is planned.

See also low-level concerns and Excalibur low-level concerns policy.

So-called 'honour-based' abuse (including FGM and forced marriage)

See also KCSiE, Annex B.

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is the non-medical, partial or total removal of the external female genital organs. This procedure is typically carried out on young girls, although it can happen later. FGM is illegal in the UK and particularly affects girls and women from Africa.

Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. The Female Genital Mutilation Act 2003 tightened this law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.

The Serious Crime Act 2015 strengthened further the legislation on FGM and now includes:

- The right to anonymity for victims.
- The offence of failing to protect a girl aged under 16 from the risk of FGM.
- The provision of Female Genital Mutilation Protection Orders (FGMPO).
- The duty on professionals (including teachers) to notify policy when they discover that FGM appears to have been carried out on a girl under 18.

NB for academy staff this will occur from a disclosure and not a physical examination

Although at the time of writing there has never been a successful prosecution for an FGM offence, since the implementation of the Serious Crime Act 2015 policy have made a number of FGMPOs.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

The most significant countries where FGM is practiced are:

Burkina Faso, The Gambia, Sierra Leone, Djibouti, Guinea, Somalia, Eritrea, Mali, Ethiopia, Mauritania

Although FGM takes place between birth and around 15 years old; it is believed that the majority of cases

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Academies need to ensure that staff receive training around forced marriage and the presenting symptoms. are aware of the 'one chance' rule, i.e. may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmufco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or academy counsellor, as appropriate.

Faith abuse

The National Action Plan to Tackle Child Abuse Linked to Faith or Belief is intended to help raise awareness of the issue of child abuse linked to faith or belief and to encourage practical steps to be taken to prevent such abuse.

Information Sharing and Child Protection

Information sharing is an important aspect of safeguarding children and vulnerable people. Serious Case Reviews often record that a failure to share information has been a key factor. It is important however that information is shared legally. What follows is guidance, if in doubt seek advice from the Head of Safeguarding.

Working Together to Safeguard Children Act (2018) says:

“The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.”

“It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required.”

“It continues to be good practice to ensure transparency and to inform parents/carers that you are sharing information for these purposes and seek to work cooperatively with them.”

When children are suffering or may be at risk of suffering significant harm, concerns must always be shared with children's social care or the police.

Sharing information enables practitioners and agencies to identify and provide appropriate services that safeguard and promote the welfare of children. Below are common myths that may hinder effective information sharing.

Data protection legislation is a barrier to sharing information

The Data Protection Act 2018 and GDPR do not prohibit the collection and sharing of personal information, but rather provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them.

Consent is needed to share personal information.

You do not need consent to share personal information. It is one way to comply with the data protection legislation but not the only way. The GDPR provides a number of bases for sharing personal information. It is not necessary to seek consent to share information for purposes of safeguarding and promoting the welfare of a child if there is a lawful basis to process any personal information required. The legal bases that may be appropriate for sharing data in these circumstances could be “legal obligation”, or “public task” which includes the performance of a task in the public interest or the exercise of official authority. Each of the lawful bases under GPDR has different requirements. It continues to be good practice to ensure transparency and to inform parents/carers that you are sharing information for these purposes and seek to work cooperatively with them.

This is not the case, unless the information is to be used for a purpose incompatible with the purpose for which it was originally collected. In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners.

The Common Law Duty of Confidence and The Human Rights Act 1998 prevent the sharing of personal information

This is not the case. In addition to the Data Protection Act 2018 and GDPR, practitioners need to balance The Common Law Duty of Confidence and the Human Rights Act 1998 against the effect on the individuals or others of not sharing the information.

IT systems are often a barrier to effective information sharing

IT systems, such as the Child Protection Information Sharing Project (CP-IS) can be useful for information sharing. IT systems are most valuable when practitioners use the shared data to make more informed decisions about how to support and safeguard a child.

Sharing information with parents

The Trust is committed to working in partnership with parents and carers. In most situations, the academy will discuss initial concerns with them. However, the D/DSL will not share information where there are concerns that doing so would:

- Place a child at increased risk of significant harm
- Place an adult at increased risk of serious harm
- Prejudice the prevention, detection or prosecution of a serious crime
- Lead to the unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

When the academy becomes aware that a pupil is being privately fostered, the academy will remind the carer/parent of their legal duty to notify Children's Social Care

Children in Care/Looked after children and previously looked after children

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

- Appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual academy heads
- The academy have appointed a designated teacher, [insert name/role], who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

Mental Health

See also KCSiE, Annex B; also Excalibur Mental Health and Wellbeing Policy

In Keeping Children Safe in Education, the definition of safeguarding was updated to specifically include mental health, see below.

Safeguarding and promoting the welfare of children is defined for the purpose of this guidance as:

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

"Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems." KCSiE

Poor mental health as a result of trauma can often manifest in a young person's behaviour, both outward and inward. Trauma can arise from abuse, exploitation and neglect, even when there is no obvious cause. When considering behaviour, particularly that which some staff may regard as "challenging", consideration should be given to a potential safeguarding issue, either currently or in the past.

Keeping Children Safe in Education says that schools should "ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems."

It is not the role of academy staff to provide a diagnosis, only appropriately trained specialists are able to do so. Staff who know their pupils well will be able to make observations that can support colleagues in diagnosing what may be happening.

It is useful to think about a graduated approach towards mental health and well-being:

- Good mental health for all pupils
- Support for vulnerable pupils (on a short, medium or long-term basis)
- Specialist response for more serious impacts on mental health

Excalibur Academies Trust request that all academies have a "designated teacher for mental health" role who will create policy, curriculum and practice in this area. **All academies by 2024 must have one member of staff at least with Senior Mental Health Lead training or Mental Health First Aid Training (in small primary schools).** All academies will be trauma informed by 2025. Excalibur Head of Safeguarding will lead the Mental Health leads in each academy to develop and share best practice across the Trust.

Identifying potential symptoms of mental ill-health in children and young people

Mental ill-health can be complex and difficult to identify as there are often several symptoms which worsen slowly over time. Academy staff are sometimes able to identify greater change than parents, for example, seeing a child after a school holiday seemingly “changed” in some way.

Childhood, and particularly adolescence, is a time of immense change and these natural changes can camouflage underlying issues, and also exacerbate them. This means that the signs of more serious emotional distress can be missed.

In general, as a sense of positive well-being declines, more serious mental health disorders disrupt the enjoyment of everyday life and impact on an ability to function well. Some apparent disorders are perfectly normal in some circumstances, for example, bereavement will lead to a period of sadness and anger.

Although the perceived stigma of mental health is lessening as time goes on, it can still discourage children and young people, and their parents, to seek support.

Warnings of a period of mental ill-health include:

- Persistent sadness
- Withdrawing from or avoiding social interactions
- Self-harming
- Talking about death or suicide
- Outbursts or extreme irritability
- Out-of-control behaviour that can be harmful
- Drastic changes in mood, behaviour or personality
- Changes in eating habits
- Loss of weight
- Difficulty sleeping
- Frequent headaches or stomach aches
- Difficulty concentrating
- Changes in academic performance
- Avoiding or missing school

Common disorders in childhood and adolescence:

Anxiety

Anxiety disorders include persistent fears and worries that prevent young people taking part in everyday activities, such as playing with friends, going to school or leaving the house. Anxiety may involve panic attacks.

Diagnoses include attachment, anxiety, generalised anxiety or obsessive-compulsive disorders.

Attention Deficit Hyperactivity Disorder (ADHD)

Children with ADHD have difficulty with a mixture of attention, impulsive behaviours and hyperactivity. ADHD can be seen without hyperactivity and is known as ADD.

Autism Spectrum Disorder

Autism Spectrum Disorder is a lifelong developmental condition which affects how people communicate and interact with the world. The autistic spectrum is broad, and it impacts people in many different ways.

Conduct Disorders

Conduct disorders loosely includes an ongoing pattern of behaviour which violates the rights of others or social norms. Typical behaviours include aggression and violence, a refusal to respond to reasonable requests, damage to property and difficulty with peer relationships. In younger children it is more often referred to as "oppositional defiant disorder."

Complicating issues could include a co-existing mental health disorder, a neuro-developmental condition, a learning disability or substance misuse, depression and other mood disorders.

Depression is identified by a persistent sadness and loss of interest in activities or interactions with others.

Eating Disorders

Young people with eating disorders have a preoccupation with body image, disordered thinking about weight loss and show unsafe eating and dieting habits. Eating disorders can be life-threatening and include anorexia and bulimia.

Post-traumatic Stress Disorder (PTSD)

Traumatic events, whether specific or taking place over a period, can leave children with PTSD. Symptoms may include fearfulness, hyper-vigilance, clinginess or a lack of concentration. Sleeplessness, nightmares and bed-wetting may also occur. PTSD might show as anger and violence towards others.

Resources

Teaching about mental wellbeing (DfE, 2020)

Make It Count: Guide for teachers

Mental Health First Aid England

Beacon House

Child-on-child Abuse

The government guidance Keeping Children Safe in Education makes it clear that schools should have procedures in place to manage allegations of abuse by pupils. This is known as child-on-child abuse, and may include:

- Bullying, including cyberbullying
- Physical abuse
- Sexual violence and sexual harassment
- Sexual exploitation
- Sharing nudes and semi-nudes
- "Initiation ceremonies" or other rituals
- Emotional abuse
- Financial abuse

Specific instances may not be abusive in themselves, but they may be indicative of power or coercive control. In areas where gangs are prevalent students may attempt to recruit other pupils using any of the above methods. Peer abuse may be used within and between gangs as weapons. Some children affected by sexual exploitation may be forced to recruit other children under the threat of blackmail or violence.

Child on child abuse should never be dismissed as "banter" or even an inevitable part of growing up. It can have a lifelong impact and may even lead to young people ending their own life. Staff in the academy should understand how to recognise child on child abuse, what the procedures are to report it and how such concerns are investigated. Gender is an important aspect of child-on-child abuse, with girls more often affected than boys. Children with SEN and disabilities are also more frequently abused by their peers.

Tackling child-on-child abuse, as with other issues, needs to include an understanding of the ways that it is seen in the academy (and local area). Strategies to respond to child-on-child abuse include understanding the levels and type of risk, approaches to minimise the risks, and how sanctions and any further referrals are made. Support needs for those abusing and the abused should also be identified.

Young people who are affected by child-on-child abuse may show physical injuries, stop attending school, have poor mental health, show physical manifestations like headaches and stomach pains, drink alcohol, smoke or start using street drugs. Young people affected may begin to abuse others.

In young people, it is simplistic to see the abuser as a solely a perpetrator, as they may be affected by abuse themselves. While sanctions for behaviour is important, policies should also reflect on how those children abusing their peers are to be supported, and this may also mean referring them to external agencies. Complex issues cannot be solved by one agency alone.

When looking at the risk of child-on-child abuse in the academy, it is vitally important to seek the views of the whole school community, including young people themselves, across all age groups, and those more at risk: girls, children with SEN and young people identifying as LGBT.

Risk can be identified from looking back at what has happened in the past and learning from those incidents. It is important to look back at previous issues and to know the academy's data on child-on-child abuse. Does the information show that particular kinds of abuse are widespread, diminishing or indicating an upward trend? One useful technique is to look with young people at different areas in the academy or the local community where incidents are higher, or more often to occur. Creating a map of safe and unsafe areas can be very enlightening.

Other aspects to consider are identifying the cultural norms in the academy, how parents are engaged in the process, and importantly what protective factors there are. Once the risk of child-on-child abuse has been assessed, strategies for minimising the risk should be identified. Such strategies should include the broader aspects such as an effective programme of healthy relationships, education, creating an academy culture of respect, and tackling gender inequality, bias and expectations.

Individual children and young people may need specific risk assessments. Whilst understanding the academy's context for child-on-child relationships and abuse, the broader context is important too. One approach that can be used is Contextual Safeguarding.

Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) 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 [state where, for example, on CPOMS].

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence², or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child:

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
 - a. a police officer;
 - b. employed by the police;
 - c. under the direction or control of the chief officer of a police force; or
 - d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - PACE Code C 2019.

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

Duty to Prevent Terrorism

Definitions:

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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.

In response to the Prevent duty on schools set out in the Counter Terrorism and Security Act 2015, the DfE have published guidance to help schools implement the duty.

Key Points

There are four themes within the Prevent duty;

1. Risk assessment
2. Working in partnership
3. Staff training
4. IT policies

Identifying “at risk” pupils

- Local authorities and police will have contextual information
- No single way to identify a young person who is at risk
- Small changes in behaviour might indicate there are concerns about their wellbeing
- Even very young children might show signs of radicalisation

Academies should act “proportionately”: the prevent duty does not require teachers to “carry out unnecessary intrusion into family life”.

Ofsted

The Schools Inspection Framework makes explicit reference to the duty to prevent radicalisation and extremism.

It is, of course, important to remember that Ofsted will be looking at impact, not just at what the academy is doing.

Policy and procedures

Academies need clear policies and procedures to address concerns about radicalisation, although it is not necessary to have a distinct policy.

Referrals

Academies should know how to make a referral to either the Prevent team or the child protection assessment team (as appropriate) when there are concerns about a child.

Academies should know how to make a referral to the voluntary “Channel” programme

Online training about Channel can be found here:

www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html

Academies should find out their local referral route, before they need it.

Working in Partnership

- Local safeguarding partnership co-ordinate local agencies responses to safeguarding children from extremism or radicalisation
- Local safeguarding partnerships refer to radicalisation or extremism concerns in their threshold guidance
- The Home Office has funded Prevent co-ordinators to work in the community, including with schools
- Effective partnership with parents to signpost them towards sources of support.

Training

- Home Office has developed a training package called WRAP – Workshop to Raise Awareness of Prevent
- Individual academies should decide their own training needs but must ensure all staff have had training through the EduCare Child Protection Refresher Training.
- See training manual
- DSLs should be able to offer advice and support to other staff

IT

- IT filtering prevents extremist material being accessed in schools (be aware of pupils using community languages to circumvent filtering)
- Internet safety
- Develop an awareness of online risks and how extremists use social media to engage with young people
- Every teacher needs to be aware of the online activity of extremist and terrorist groups

Building resilience to radicalisation

Academies should offer a “safe environment” to explore sensitive or controversial topics and should “satisfy themselves” that any resources they use are suitable for pupils.

- Spiritual, moral, social and cultural (SMSC)
- British values
- Personal, Social and Health Education (PSHE)
- Time to consider sensitive or controversial topics
- Give pupils skills and knowledge to understand and manage difficult situations

- Learn to recognise and manage risk
- Learn to make safer choices
- Deal with peer pressure when it threatens their personal safety or well-being

Citizenship

- Understand political and social issues
- Learn about democracy, government and how laws are made
- Learn about diversity and the wide-range of ethnic identities in the UK
- Learn about the need for mutual respect and understanding

What to do if you have a concern about individual pupils

- Identify concern
- Inform Designated Safeguarding Lead in the usual way
- The DSL will refer to Social Care or the local Prevent lead according to local protocols
- For non-urgent concerns, the local police can be called on 101

Department for Education Helpline

Dedicated telephone helpline for extremism to help academy staff and AC governors to raise concerns relating to extremism directly and in confidence. The helpline is not intended for use in emergency situations.

Telephone 020 7340 7264

Email: counter.extremism@education.gsi.gov.uk

Documents

Prevent duty guidance for England and Wales (Home Office, 2015)

The use of social media for online radicalisation (Home Office, 2015)

The Prevent duty: departmental advice for schools and childcare providers (DFE, 2015)

Prevent Duty: catalogue of training courses (DfE, 2016)

Safeguarding Pupils who are Vulnerable to Extremism

Extremism and radicalisation is another part of safeguarding children and young people. As with any other concern, the risk of harm is raised when young people are vulnerable and is often noticed when students change their behaviour, clothing or attitudes. Ofsted look carefully at how schools are safeguarding children from extremism and radicalisation.

One aspect of safeguarding children and young people from radicalisation is set out in "Promoting fundamental British values as part of SMSC in schools". This guidance set out British values as:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of those with different faiths and beliefs

Government "Prevent" Strategy

The government approach to reducing the risk of terrorism is called "CONTEST" and has four parts to it:

Protect – to strengthen protection against a terrorist attack;

Prepare - to mitigate the impact of a terrorist attack;

Pursue – to stop terrorist attacks;

Prevent –to stop people becoming terrorists or supporting terrorism

Extremism takes many forms and all ideologies are included in this area of safeguarding:

- Islamic extremism
- Left-wing extremism
- Right-wing extremism
- Animal rights extremism

Indicators of vulnerability include:

Identity

- The student/pupil is distanced from their cultural/religious heritage and experiences;
- Discomfort about their place in society;
- Personal crisis – the student/pupil may be experiencing family tensions;
- A sense of isolation;
- Low self-esteem;
- They may have dissociated from their existing friendship group and become involved with a new and different group of friends;
- They may be searching for answers to questions about identity, faith and belonging.

Personal Circumstances

- Migration;
- Local community tensions; and
- Events affecting the student/pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy

Unmet Aspirations

- The student/pupil may have perceptions of injustice;
- A feeling of failure;
- Rejection of civic life;

Experiences of Criminality

- Involvement with criminal groups
- Imprisonment; and
- Poor resettlement/reintegration on release

Special Educational Needs

- Social interaction

- Empathy with others
- Understanding the consequences of their actions; and awareness of the motivations of others

More critical risk factors could include;

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation, resulting in issues of identity crisis and/or personal crisis.

De-radicalisation

- All inclusive ethos
- Create doubt or disillusionment
- Question ideas
- Safe discussions
- Range of views

Private fostering

The legislation governing private fostering is the 'Children (Private Arrangements for Fostering) Regulations 2005' and came into force following the death of Victoria Climbié in 2000. Victoria was privately fostered by her great aunt.

Given the 'hidden' nature of much private fostering, local authorities have a duty to raise awareness of the need to notify the local Children's Services department.

What is private fostering?

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

Why are children in private foster care?

Most frequently, young people are in private foster care for the following reasons:

- Children from other countries sent to live in the UK with extended family
- Host families for language schools
- Parental ill-health
- Where parents who have moved away, but the child stays behind (e.g. To stay at the same school to finish exams)
- Teenagers estranged from their families

The Ofsted report into Private Fostering also refers to these reasons:

- Children brought from outside the UK with a view to adoption
- Children at independent boarding schools who do not return home for holidays and are placed with host families
- Trafficked children

The Duty to refer to the Local Authority

Each party involved in the private fostering arrangement has a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Once the notification has been made to the authority. Children's Services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carers' household. Children's services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

Other professionals, for example GPs surgeries and schools, also have a duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

Note that although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the academy. However, it should be clear who has parental responsibility.

Are children in private foster care defined as 'Looked After Children' ?

No. The term 'Looked After Children' means children who are looked after by the local authority. Privately fostered children are outside the care of the local authority.

Academies should not therefore code children in private foster care as 'LAC'. The Trust requires you to code them on CPOMs or Bromcom as vulnerable and their health and wellbeing should be monitored carefully.

How do local authorities monitor the welfare of children in private fostering?

The local authority must visit each privately fostered child at least every six weeks in the first year of the arrangement; and at least every twelve weeks in the second and subsequent year. In some areas schools are visited as part of this process to discuss the child with teachers.

The private foster carer has a duty to inform the local authority of any substantive changes to the arrangement or within the household.

Should the academy be told about a fostering arrangement?

There is no duty for schools to be given information about a child who is privately fostered by the family, carer or the local authority. There is however a duty on schools to inform children's services where they become aware of such an arrangement.

Sexual Violence and Sexual Harassment

See also KCSiE, Annex B and Excalibur Sexual Harassment Policy

(See guidance document “Sexual Violence and Sexual Harassment between children in schools and colleges” (DfE 2021))

The “Sexual violence and sexual harassment between children in schools and colleges guidance” is a standalone document. It is also summarised in Keeping Children Safe in Education Part 5.

The guidance covers:

- What sexual violence and sexual harassment is
- What the schools' and colleges' legal responsibilities are
- Creating a whole academy or college approach to safeguarding and child protection
- How to respond to reports of sexual violence and sexual harassment

Sexual violence refers to criminal acts: rape, assault by penetration and sexual assault, as defined by the Sexual Offences Act 2003. Sexual harassment is described as “unwanted conduct of a sexual nature”. Importantly, the definition of consent is stated and will help pupils begin to understand it more clearly.

Sexual violence and sexual harassment should be seen in the context of developing a whole academy safeguarding culture, where sexual misconduct is seen as unacceptable, and not “banter” or an inevitable part of growing up. It should be recognised that these issues are likely to occur, and so academy leaders should know the extent and nature of the issue in their own academy and should have plans and procedures in place to deal with them. Groups at particular risk include girls, students who identify as LGBT+, or are perceived by their peers to be LGBT+, and pupils with SEND.

The guidance is clear that victims and alleged perpetrators may be kept apart in classrooms and other shared spaces, and that consideration should be given about travel to and from school. The emphasis should be on ensuring that the victim can continue their normal routines. Schools can consider the conduct of the alleged perpetrator as part of their behaviour policy on the “balance of probabilities” and apply appropriate and proportional consequences. However, in cases that the police are handling, school should ensure that they do not jeopardise the investigation.

It is important that schools record incidents across the whole spectrum of sexual violence and sexual harassment, so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it.

Definitions:

Victim

Although not everyone affected by sexual violence or harassment considers themselves in this way, the guidance refers to this person as the victim throughout.

Alleged Perpetrator

Refers to the young person(s) responsible for the violence or harassment; the alleged child perpetrator must also be considered as someone in need of support and may be a victim of abuse themselves.

Sexual violence

Offences defined below under the Sexual Offences Act 2003:

Rape: intentional penetration of the vagina, anus or mouth of another person, using the penis, without consent

Assault by penetration: intentional penetration of the vagina or anus of another person using a body part (other than the penis), or other object, without consent.

Sexual assault: intentionally touching another person sexually, without consent

Sexual Harassment: unwanted conduct of a sexual nature, including sexual comments, "jokes" or taunts; physical behaviour; or online sexual harassment.

Consent

To agree to vaginal, anal or oral penetration with free will and the capacity to do so; consent is not all-encompassing, may cover only certain sexual activities, may be given with conditions, may be withdrawn at any time; and consent is needed every time sexual activity takes place.

Harmful Sexual Behaviours

Children's sexual behaviours exist on a wide continuum across different ages and stages of development. However, abusive and violent sexual behaviours are inappropriate. Harmful sexual behaviours are often found in children who have been, or are being, abused themselves. Children showing signs of harmful sexual behaviours are in need of appropriate support themselves.

Legal Responsibilities

Schools have a legal responsibility to understand and minimise the risk of sexual violence and sexual harassment as a result of the:

- Statutory safeguarding duty
- Academy's own child protection policy and a behaviour policy which includes its procedures to prevent and tackle bullying
- Need to teach Sex and Relationships Education (in maintained, secondary schools)
- Human Rights Act (1998)
- Equality Act (2010)
- Public Sector Equality Duty

Harmful Sexual Behaviour

Sexualised behaviours in children and young people exist along a continuum. It is vital that professionals are able to distinguish normal from abnormal behaviours. A child's sexual behaviour should be considered abnormal if it:

- Occurs at a frequency greater than would be developmentally expected

- Interferes with the child's development
- Occurs with coercion, intimidation, or force
- Is associated with emotional distress
- Occurs between children of divergent ages or developmental abilities
- Repeatedly recurs in secrecy after intervention by caregivers

Perhaps the best-known resource to help professionals consider normal or abnormal sexual behaviour in children is the “Sexual Behaviours Traffic Light Tool” from Brook, the sexual health charity. ***The Trust recommends that all academies subscribe to this tool and the training associated with it.***

The theoretical background to harmful sexual behaviours in children and young people can be found in the NSPCC's Harmful Sexual Behaviour Framework, in particular the continuum model developed by Simon Hackett, University of Durham.

Academy response to pupil behaviours

The guidance cannot provide specific responses to particular behaviour, as there are so many different circumstances to take into account. Academies should look at the behaviours that they most often see and develop relevant responses to them.

The importance of academy culture

Keeping Children Safe in Education says, “Not tackling child-on-child abuse can lead to an unsafe environment, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.”

“Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours can lead to a culture of unacceptable behaviour.”

Whole academy approach

Reducing the risk of sexual violence and sexual harassment should be seen in the context of developing a whole academy culture of safeguarding. The procedures to deal with sexual violence and sexual harassment should be transparent, and easy to understand for pupils, staff and parents. Staff need to understand how these safeguarding risks manifest in their school and local context. All staff must know how to raise a concern they may have about a pupil, or another adult.

Academies need to develop effective programmes of personal, social, health and economic education (PSHE) and sex and relationships education (SRE). Pupils should be helped to understand safeguarding issues, how to raise a concern they may have about themselves, or a friend or peer and learn to recognise and develop healthy and respectful relationships, avoiding stereotypes and promoting equality. Pupils should be taught that sexual violence and sexual harassment is always wrong.

Academies should consider how they might use the expertise of external, specialist organisations to train staff or support groups of young people.

Beyond Referrals: levers for addressing harmful sexual behaviour in schools (Contextual Safeguarding Network)

- This toolkit includes a range of school self-assessment methods:
- Student Survey
- Staff Survey
- Parent's' Survey
- Reviewing Policies and Procedures
- Reviewing Safeguarding and Behaviour Logs in Schools
- Hotspot Mapping Guidance

Download the toolkit here: [Beyond Referrals: levers for addressing harmful sexual behaviour in schools](#)

Safeguarding and supporting victims and alleged perpetrators

Victim	Alleged Perpetrator	Other children
<ul style="list-style-type: none"> • Needs and wishes of victim are paramount • Not made to feel they are the problem • Consider proportionality of response • Aim for victim to carry out normal routine • Recognise that they may struggle in class and may need time out (if they wish) • Be aware that they may not disclose the whole picture immediately • Prepare for support over a long period and consider who is involved (internal and external) • If victim moves school, the DSL informs the new school of the need for continued support 	<ul style="list-style-type: none"> • Possible tension between discipline and support (these are not mutually exclusive) • Consider age/developmental stage/any SEND • Proportionate response • Consider unmet needs (for example, harmful sexual behaviours (HSB) in younger children may be a sign of abuse or trauma) • If (alleged) perpetrator moves school, the DSL informs the new school of the issues and transfers the child protection file 	<ul style="list-style-type: none"> • Witnesses may need support (especially in cases of sexual violence) • Avoid allowing pupils to "take sides" • Minimise potential for bullying or victimisation in school and on school transport • Be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed) • Develop safeguarding culture • Constantly review reporting procedures and responses • Consider potential for systematic and environmental weaknesses

Sexual Violence and Sexual Harassment – Implementation Checklist

- Staff Learning and Development
- Senior Leadership Team

- Governing Body
- Designated Safeguarding Leads
- Pastoral Leads
- PSHE/RSE Leads
- All staff

Consider how specialist, external organisations could support the development of staff knowledge and understanding in this area.

Pupil Curriculum – page 33-34 of KCSIE 2022 for details of what to include

- Developing healthy, respectful relationships
- What is consent?
- What is sexual violence/sexual harassment?
- Content in SRE/PSHE, other curriculum areas?
- Pupils know how to report concerns about themselves, friends or other pupils

Consider how specialist, external organisations could support the development of staff knowledge and understanding in this area.

Policy and Procedures for incidents of sexual violence and sexual harassment

- Have clear and easily understood policy and procedures
- Ensure sexual violence and sexual harassment is covered in:
 - Child Protection policy
 - Behaviour policy
 - Preventing and tackling bullying policy
 - Sexual harassment policy
- Prepare risk assessment pro-forma (ensure regular review is emphasised)
- Ensure local support services and contact details are documented and easily available
- Identify particular groups at risk, e.g. girls, LGBT students, pupils with SEND

Understand the local context

- Collate data about different types of sexual violence/sexual harassment incidents
- Identify who might be at greater risk
- Know the impact of the academy's work in this area

Sharing nudes and semi-nudes (formerly “sexting”)

Until the publication of the guidance document from the UK Council for Internet Safety (UKCIS) in December 2020, sharing nudes and semi-nudes of children under 18, by young people under 18 was known as “sexting”. However, “sexting” can be confused by some to mean sending text messages about sexual matters. Sharing nudes and semi-nudes can also

be referred to as “youth-produced imagery.” The legal term is “indecent imagery”, and “image-based sexual abuse” is used to describe the non-consensual sharing of nudes and semi-nudes.

Nude and semi-nude images can be sent in a myriad of different ways including social media, gaming platforms, texting or “off-the-air” methods, for example, airdrop on Apple devices. These images may be sent privately or publicly, with or without consent. The images could be still pictures, video or live-streamed. The content may include one person or several.

Whilst “indecent” is not defined in law, the following examples are likely to meet the criteria:

- Nude or semi-nudes sexual posing e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear
- Someone nude or semi-nude touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting someone else sexually
- Sexual activity that includes animals

Creating and sharing nude or semi-nudes of under-18s is illegal, it can be a part of some young people’s sexual development and their exploration of relationships. For this reason, such images may not be inherently harmful to all young people. Some nude images may not be sexually motivated. However, the impact can lead to a risk of harm. In many situations, the response should be one of education and support. Guidance from the UKCIS and the National Police Chiefs’ Council (NPCC) is primarily one of safeguarding and, in certain, circumstances, education settings may be able to deal with the situation without reporting the matter to the police.

How schools should manage incidents where nude or semi-nude images have been shared is set out in “Sharing nudes and semi-nudes” (UKCIS). Designated Safeguarding Leads should ensure that they are familiar with the guidance.

The UKCIS guidance only applies to the sharing of nudes and semi-nudes by and between under-18s. It does not cover the sharing of adult pornography between young people; or the sending of written sexual texts without images. Where adults are sharing images of under-18s, the police should be informed without delay.

In schools, staff who learn of incidents where nude or semi-nude images have been shared must immediately report them to the Designated Safeguarding Lead (DSL). The UKCIS has a one-page overview which outlines to staff what they should and should not do prior to informing the DSL:

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.

- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Considering the motivation of “sexting” images

When analysing the seriousness of a sexting incident and whether to refer the matter to police or social care, it is important to consider the possible motivation of the young person producing the sexual imagery.

Sexting: A Typology

Aggravated Incidents involve criminal or abusive elements beyond the creation, sending or possession of youth-produced sexual images

Adult offenders attempt to develop relationships by grooming teenagers, in criminal sex offences even without the added element of youth-produced images. Victims may be family friends, relatives, community members or contacted via the Internet. The youth-produced sexual images may be solicited by adult offenders.

Youth Only: Intent to Harm cases that arise from interpersonal conflict such as break-ups and fights among friends; involve criminal or abusive conduct such as blackmail, threats or deception; or involve sexual abuse or exploitation by young people.

Youth Only: Reckless Misuse is when there is no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.

Experimental Incidents involve the creation and sending of youth-produced sexual images, with no adult involvement, no apparent intent to harm or reckless misuse.

Romantic episodes in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair.

Sexual Attention Seeking in which images are made and sent between or among young people who were not known to be romantic partners, or where one young person takes pictures and sends them to many others or posts them online.

Other Cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives. (Source: Sharing nudes and semi-nudes (UKCIS))

Important Considerations:

Should DSLs view the nude or semi-nude image?

DSLs must not intentionally view any nudes and semi-nude images unless there is good and clear reason to do so, this needs delegated authority from principal. The decision and reasons for viewing the image(s) must be recorded, as should the names of the people present. (For information about how viewing should be carried out, see "Sharing nudes and semi-nudes")

The image(s) should only be viewed:

- To establish facts because it is not possible to do so from young person
- To report to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report.
- If unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network

Questions to think about when reviewing the incident

- How old is the young person or young people involved?
- Do you have any concerns about the young person's vulnerability?
- Does the young person understand the possible implications of sharing the nudes and semi-nudes?
- Why were the nudes and semi-nudes shared? Was the young person put under pressure or coerced or was consent freely given?
- Have the nudes and semi-nudes to more than one person?
- Was the image shared without the consent of the young person who produced the images?
- Have the nude and semi-nudes been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread of the images?
- Are there additional concerns if the parents or carers are informed?

Children who need a social worker

Pupils may need a social worker due to safeguarding or welfare needs and complex family circumstances. Academies recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

It is the responsibility of the Local Authority to inform the academy when a child has a social worker. Where the academy is aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures

Escalation procedure

The procedure augments the guidance provided by the South West Child Protection Procedures and provides local procedures to be followed. Please ensure you have looked at your local safeguarding board and you follow this guidance.

Before making an escalation:

Before escalating a concern, organisations should ensure that all possible opportunities to resolve the issue this should include:

- Recognition that there is a disagreement over a significant issue, which impacts on the safety and welfare of a child;
- Identification of the problem, and clarity about the disagreement and what you aim to achieve.

These two points could should involve consulting with the Head of Safeguarding to clarify thinking and reviewing the relevant multi – agency policies and procedure.

The Head of Safeguarding for the Trust will then make a decision about whether to move to stage one of raising the concern with the team manager of the agency. The DSL with support of their Principal will then raise it. If it is not resolved in a satisfactory manner then the Head of Safeguarding for the Trust will then move through the relevant Local Safeguarding Board next stages.

OFSTED

Ofsted Inspections and Safeguarding (September 2021)

Schools are aiming to safeguard children as part of their day-to-day work. Whilst an Ofsted inspection is partly about compliance, what they really want to see is impact. This is not just about Ofsted judgements. There are four key aspects inspectors will look for:

- Are the children safe?
- How does the academy know the pupils feel safe?
- Does the academy help pupils learn to keep themselves safe and to be safer?
- What happens when children aren't safe?

Sexual Violence and Sexual Harassment

In June 2021, the findings from Ofsted's 'Review of sexual abuse in schools and colleges' were published. Researchers found that in some schools sexual violence, sexual harassment, both online and offline, had become so commonplace that young people, were not reporting it. In updated the inspection guidance, Ofsted said, 'leaders and managers should assume that sexual harassment and abuse are happening in their setting, even when there are no specific reports and should put in place a whole-school/college approach to respond to the issues.'

New sections have now been included in the inspection framework and in the inspecting safeguarding in early years, education and skills document to direct inspectors to look at the evidence that the academy is responding effectively to child-on-child harms.

Documents to read

Three documents which cover what academies need to know about the safeguarding expectations on academies. It is an expectation that all DSLs will have read the following :

- Keeping Children Safe in Education (latest version)
- Ofsted Inspection Framework (latest version)
- Inspecting safeguarding in early years, education and skills (Updated 2021)
- Positive Environments Where Children Can Flourish (Ofsted, 2018)
- Review of sexual abuse in schools and colleges (Ofsted, June 2021)

Keeping Children Safe in Education is the key document and although everyone needs to read Part One and Annex A, senior staff should read the whole document as the content tells school about what is required.

Ofsted Judgements

- Overall Effectiveness
- Quality of Education
- Behaviour and Attitudes

- Personal Development
- Leadership and Management

Safeguarding does not have a specific judgement; it is included in the leadership and management judgement. If safeguarding in the academy is judged ineffective, the leadership and management grade will be inadequate and the overall effectiveness grade is going to be inadequate as well. Safeguarding also forms part of the behaviour and attitudes judgement, if the pupils don't feel safe; and in the personal development judgement, if pupils are not being helped to live life in modern Britain or are at risk of extremism and radicalisation.

Behaviour and Attitudes

Positive traits

- Pupils feel safe
- Any incidents of bullying, discrimination, and child-on-child abuse (online or offline) are dealt with quickly, consistently, and effectively wherever they occur.

Ineffective traits

- Where there are frequent incidents of bullying or prejudiced and discriminatory behaviour
- Pupils have little confidence in the school's ability to tackle these issues

Personal Developments

Positive traits

- Enabling pupils to recognise online and offline risks to their wellbeing
- Pupils know about the support available to them
- Develop an age-appropriate understanding of health relationships

Ineffective traits

- Leaders and those responsible for governance are not protecting pupils from radicalization and extremist views
- Pupils are unprepared for life in Modern Britain

Leadership and management

Positive traits

- Staff wellbeing is actively considered and supported
- Governance ensures that the academy fulfils its statutory duties
- School has an effective culture of safeguarding

Ineffective traits

- Safeguarding does not meet statutory requirements
- Safeguarding gives serious cause for concern
- Insufficient action has been taken to remedy weaknesses following a serious incident

Effective Safeguarding Culture

1. Always act in the best interests of the child
2. Secure help in a timely way
3. Identify pupils who are at risk of harm or have been harmed
4. Manage safer recruitment and any allegations about adults.

Ineffective Safeguarding

1. Allegations about staff not appropriately handled.
2. Pupils frequently missing from school, but this is not addressed
3. Pupils do not feel safe in school. Pupils do not feel confident staff will help.
4. Incidents of bullying or discriminatory behaviour are common.

Information required by 8.00am on the morning of the inspection

- Single central record
- Records and analysis:
 - Sexual violence and harassment
 - Bullying, discriminatory, and prejudiced behaviour
 - Attendance
- Referrals to DSL:
 - Referrals to local authority and details of the resolution
 - List of open cases and those with a plan

Ofsted is not just interested in seeing the school's records. Inspectors will look at the analysis of them and whether this has led to changes in how or groups of pupils are safeguarded. Records do not need to be anonymised, as Ofsted inspectors have the right to see these records.

Alternative Provision

Keeping Children Safe in Education is quite clear that schools continue to be responsible for pupils educated offsite in alternative provisions. Inspectors will visit the alternative provision if it has not been inspected. Schools need to be able to be confident about these questions:

- How many pupils, and where are they?
- Is the alternative provision registered?
- Has the academy checked it is a safe place?
- Is attendance and progress checked?
- Is personal development promoted?
- Has the alternative provider provided written evidence that all relevant checks have been carried out on their staff?

Physical Intervention (Restraint)

See also Excalibur Restraint Policy

In 2018, Ofsted published "Positive Environments Where Children Can Flourish" which sets out expectations around physical intervention. In settings where physical intervention is part of the behaviour management policy, then it is important that staff have read this document and the setting has reviewed their physical intervention strategy in the light of the document's expectations. The document doesn't prevent physical intervention, but does emphasise that staff must clearly understand when it is acceptable. Staff should manage behaviour which is challenging, starting with the least intrusive approach for the situation.

The Trust expects that all academies will have staff trained in restraint through TeamTeach and that all incidents will be recorded on the academy system and also within the record book that must be kept.

Signs of successful safeguarding

- Pupils can identify a trusted adult
- Adults understand the risks associated with technology
- Clear and effective arrangements for safeguarding CPD
- Supervision for staff who work with pupils whose safety and welfare are at risk

(Source: Inspecting safeguarding in early years, education, and skills (Ofsted 2021))

Summary

It is Ofsted's role to inspect the safeguarding work of schools, but it is important to remember that this is now a matter of simple compliance. Safeguarding is complex and is about intention and impact. At its heart safeguarding is about the vision and values of the academy.

Appendix One – Staff CPD Programme

For DSLs to check that they are ensuring that training and CPD is protecting children. DSLs to use this to assess – the key question is where is your evidence for the effectiveness of this.

	Included in Staff CPD Programme (Y/N)
Safeguarding training for staff, including online safety training, should be integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning.	
Know that safeguarding and promoting the welfare of children is everyone's responsibility	
Know that safeguarding children is everyone's responsibility	
Know that professionals should always consider what is in the best interests of the child	
Know that everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action	
Know the definition of safeguarding and promoting the welfare of children	
Know that children refers to everyone under the age of 18	
Know that all academy and college staff have a responsibility to provide a safe environment in which children can learn	
Know that all schools and colleges should have a designated safeguarding lead who will provide support to staff members to carry out their safeguarding duties	
Know that all academy and college staff should be prepared to identify children who may benefit from early help	
Know that in the first instance, staff should discuss early help requirements with the designated safeguarding lead.	
Know that all staff may be required to support social workers and other agencies following any referral	
Know that all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession	
Be aware of the contents of the academy's child protection policy	

Be aware of the contents of the academy's staff behaviour policy (code of conduct)	
Be aware of the role of the designated safeguarding lead	
All staff members should be aware that they must take part in safeguarding and child protection training, which is regularly updated, at least annually	
All staff should be aware of the early help process, and understand their role in it.	
All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989	
All staff should know what to do if a child tells them he/she is being abused or neglected	
All staff should know how to manage the requirement to maintain an appropriate level of confidentiality	
All staff must know that they should never promise a child that they will not tell anyone about an allegation	
All staff should understand the definition of abuse	
All staff should understand the signs and symptoms of physical abuse	
All staff should understand the signs and symptoms of emotional abuse	
All staff should understand the signs and symptoms of sexual abuse	
All staff should understand the signs and symptoms of neglect	
All staff should understand the impact and indicators of child sexual exploitation (CSE)	
All staff should be aware of the impact of drug taking	
All staff should be aware of the impact of alcohol abuse	
All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues	
All staff should be aware of the dangers of sharing nude and semi-nude images, including videos	
It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports	

All staff should understand, that even if there are no reports in their schools or colleges it does not mean child-on-child abuse is not happening, it may be the case that it is just not being reported	
It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, that are actually abusive in nature	
Staff should be able to recognise the signs of child-on-child abuse and how to report their concerns	
All staff should be able to reassure victims (of child-on-child sexual abuse) that they are being taken seriously and that they will be supported and kept safe	
All staff should be aware of the dangers of children going missing from school, home or care	
Staff should be aware of the new definition of domestic abuse. (Note: The definition of Domestic Abuse Act 2021 applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. Children are victims of domestic abuse.)	
All staff should be aware of the impact of domestic abuse	
All staff should be aware of fabricated or induced illness	
All staff should have an awareness of faith abuse	
All staff should consider whether children are at risk of abuse or exploitation in situations outside their families (this is known as Contextual Safeguarding)	
All staff should be aware of impact of the court system	
All staff should be aware of impact of family members in prison	
All staff should be aware of the impact of "County Lines"	
All staff should be aware of the impact of child criminal exploitation (CCE)	
All staff should be aware of homelessness	
All staff should be aware of female genital mutilation (FGM)	
All teachers should be aware of their duty to report a disclosure of FGM to the police	
All staff should have an awareness of forced marriage	

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime	
All staff should be aware of the impact of gangs and youth violence	
All should have an understanding of so-called "Honour-based Abuse"	
All staff should have an awareness of gender-based violence against women and its difference forms	
All staff should have an awareness of hate crime	
All staff should be aware of the impact of poor mental health on safeguarding	
All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect and exploitation	
All staff should have an awareness of private fostering and the duty on schools to report such arrangements	
All staff should have an awareness of relationship abuse	
All staff should have an awareness of trafficking and modern day slavery	
All staff should understand the academy's duty to prevent radicalisation	
All staff should understand the signs to looking for when considering the risk of radicalisation	
All staff should know that if a child is in immediate danger, or at risk of harm a referral should be made to children's social care or the police	
All staff should know that all concerns, discussions and decisions should be made in writing	
All staff should be aware of the impact of poor safeguarding practice	
All staff should understand the academy's whistleblowing policy	
All staff should be aware of how to raise a concern outside the academy or college	
All staff should know that they are able to make a referral to children's social care themselves	
All staff should understand the impact of technology on safeguarding	

All staff working with under –8s should understand what is meant by disqualification by association	
All staff should understand the definition of “Upskirting”	
All staff should be aware of meaning of “Position of Trust” in the Sexual Offences Act 2003	
All staff should be aware that untrained staff should not make a diagnosis, but can make observations	
All staff should be aware that untrained staff should not make a diagnosis, but can make observations	
All staff should be aware that traumatic experiences can have a life-long impact on mental health, behaviour and education. All staff should have knowledge of what qualifies as a traumatic experience.	
All staff should be aware that when a child has a social worker, it is an indicator that the child is more at risk than most pupils	
Schools and colleges should ensure that staff understand how to recognise and report concerns about other adults in the academy, including low-level concerns policy by ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.	
What to do if you’re worried a child is being abused (DfE 2015)	
All staff should understand that children with special educational needs or disabilities are more vulnerable to abuse and harm	
All staff should be aware of the indicators of abuse or neglect traumatic experiences can have a life-long impact on mental health, behaviour and education	
Guidance for safer working practices (Safer Recruitment Consortium 2019)	
All staff should understand how to work with children so that they protect children from harm	
All staff should understand how to work with children in an open and transparent way	
Guidance for safer working practices (Safer Recruitment Consortium, Addendum April 2020)	
Staff should know how to follow good practice when teaching children online during home-school learning	

Prevent Duty (DfE 2015)	
All staff should understand what the Prevent duty means for schools	
All staff should understand what to do to demonstrate compliance with the duty	
All staff should understand where to find further information, advice and support	
All staff should be able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified	
All staff should understand the academy's arrangements to promote pupils' welfare and prevent radicalisation and extremism	
All staff should be able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified	
All staff should be able to demonstrate a general understanding of the risks affecting children and young people in the area	
All staff should be able to demonstrate a specific understanding of how to identify individual children who may be at risk of radicalisation	
All staff should understand the online risks of radicalisation	
All staff should understand how to refer concerns to the academy's designated safeguarding lead	
All academy staff should understand when it is appropriate to make a referral to the Channel programme	
Child Sexual Exploitation - definition and guide for Practitioners (DfE 2017)	
All staff should be aware of the guidance set out in section A of "Child Sexual Exploitation2 (DfE 2017)	
All staff should understand the definition of child sexual exploitation	
All staff should understand which children are especially vulnerable to sexual exploitation	
All staff should understand how sexual exploitation can have links to other kinds of crime	
All staff should understand the possible indicators of child sexual exploitation	
Academy procedures	

All staff should know how to report concerns about a child	
All staff should know how to report concerns about an adult	
All staff should know how to report concerns about the principal	
All staff should know how to report concerns about the proprietor (where relevant)	
A Competency Framework for Governance (DfE 2017)	
Someone on the Board knows the requirements relating to the safeguarding of children	
Everyone on the Board knows the duties relating to the safeguarding, including the Prevent Duty	
Sexual Violence and Sexual Harassment between children (DfE 2021)	
All staff should understand issues around sexual violence and sexual harassment between children	
All staff should understand the academy's approach to managing incidents of sexual violence and sexual harassment	
Teaching online safety in schools (DfE, 2019)	
All staff should be aware of the risks and dangers associated with online devices and the internet	

Appendix Two – Safeguarding Calendar

This plan has been designed to support academies to develop a culture of safeguarding. It is important to note that this is a best practice plan – some aspects are statutory; some are suggestions.

September	What to do DSL	What to do Safeguarding AC governor	RAG
Policies	Update Excalibur Safeguarding and Child Protection policy to academy context Trust CP Handbook to be updated for context	Monitor the safeguarding policy and handbook is completed at school level	
	Upload Safeguarding and Child Protection policy to academy website and ensure printed copies are available as necessary. Upload CP Handbook to website/staff SharePoint and share where to find with staff.		
	Review other policies related to safeguarding, update as necessary. See SharePoint site for all safeguarding policies. Statutory policies for schools and academy trusts: https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts		
	Audit academy website to ensure that it is compliant with statutory requirements. Academies, free schools and colleges: https://www.gov.uk/guidance/what-academies-free-schools-and-colleges-should-publish-online	Check website with DSL for compliance	
Governance	Ensure safeguarding AC governor in place and update Excalibur Head of Safeguarding of any changes		
Training	Thoroughly induct all new members of staff and ensure that they have received appropriate safeguarding and child protection training, including training on the Code of Conduct and Safer Working		

	<p>Practice. Explain the following to them as part of this training:</p> <ul style="list-style-type: none"> • The Safeguarding and Child Protection Policy • The Behaviour Policy • The staff Code of Conduct • The academy's procedures for children missing education • The role of the DSL (including the name of the DSL and DDSLs) 		
	<p>Deliver safeguarding full training to all new staff by allocating EduCare training – section in handbook</p> <p>Deliver safeguarding annual refresher training to all staff by allocating EduCare training - see section in handbook</p>		
	<p>Deliver safeguarding training to AC governors (or equivalent) by allocating EduCare training</p> <p>Allocate safeguarding training for lead safeguarding AC governor</p>	<p>Ensure AC governors have completed their training by 20th October</p> <p>Complete own training by 20th October</p>	
	<p>Review training and information shared with agency staff, contractors and volunteers to ensure that it is up to date and fit for purpose. See training manual.</p>		
	<p>Review information shared with visitors to the academy (e.g. leaflet handed out at reception) and make sure that it is fit for purpose and handed out to every visitor.</p>		
	<p>Ensure read and act on all newsletters and emails from Head of Safeguarding regarding KCSIE updates and new actions.</p>		
	<p>Sign up to Local Authority DSL Forums for this term.</p>		
Documentation and record-keeping	<p>Provide new staff with copies of (these can be online):</p> <ul style="list-style-type: none"> • The Safeguarding and Child Protection Policy • The Behaviour Policy • The staff Code of Conduct 		

	<ul style="list-style-type: none"> The academy's procedures for children missing education* The role of the DSL (including the name of the DSL and DDSLs)* 		
	Keep a record to evidence that the above documents have been shared with new staff, they have read and understood them and attended training where they have been explained to them. This needs to be recorded on SCR.		
	<p>Ensure all staff have read the following documents and copies have been given to them as necessary:</p> <ul style="list-style-type: none"> The Safeguarding and Child Protection Policy The Behaviour Policy The staff Code of Conduct The academy's procedures for children missing education* The role of the DSL (including the name of the DSL and DDSLs)* 		
	Keep a record to evidence that the above documents have been shared with staff, they have read and understood them and attended training where they have been explained to them. This needs to be recorded on SCR.		
	Check that all new pupil safeguarding files have been received, stored and receipts provided to the sending school.		
	Check pupil contact details to make sure that you have at least one and ideally two contact numbers for parents/carers.		
Self Evaluation	Review previous year action plan, audit and data for Excalibur alongside S175 audit and action plan	Review with DSL	
Reporting to Excalibur	Excalibur audit and data info to completed by 20th October and sent to Head of Safeguarding (this can be started in July)		
	Complete KCSIE action plan if applicable sent by Head of Safeguarding		

Promoting educational outcomes	Share relevant information about vulnerable children and those with a social worker in order to promote educational outcomes for this cohort. See Keeping Children Safe in Education.		
Alternative Provision	Check list of pupils attending alternative provision and make sure you have all necessary paperwork relating to safeguarding and safer recruitment.		
Planning ahead	Plan topics covered in assemblies throughout the year. Link this to cultural calendar and PHSE curriculum.		
	Plan topics to be covered in parent newsletters throughout the year to match topics covered in assembly. Plan timetable whole academy safeguarding updates throughout the year.		
Communication with parents	Share safeguarding information in the parent newsletter. Suggested topics: <ul style="list-style-type: none"> • Introduction to the pastoral and safeguarding team • Travelling to and from school safely 		
National events this month	<ul style="list-style-type: none"> • Sexual Health Week 		

**If this information is contained within a policy, copies should be provided. Otherwise, they should be clearly explained to staff at induction.*

October	What to do DSL	What to do Safeguarding AC governor	RAG
Governance	Report for AC governors on child protection and safeguarding outcomes previous year, Excalibur audit and planned actions for this year.	Ensure item on Academy Committee agenda re safeguarding report	
Training	Suggested topics to cover in staff training or briefings this month: <ul style="list-style-type: none"> • The role of Early Help • Child on child abuse 	Ensure that governors have completed all Educare training.	

	Review training records for safeguarding team and book DSL Refresher training and other relevant training for staff via EduCare. See training manual.		
	Ensure that all staff have completed allocated training and records have been updated on SCR.		
	DSL to attend any local update forums		
Self-evaluation	Complete the Section 175 Local Authority Safeguarding Audit		
	<p>Conduct safeguarding internal review -</p> <ul style="list-style-type: none"> • Ensure CP thread is running through curriculum and this evidenced – curriculum map (ensure consider advice around Harmful sexual behaviours) • Availability of information for children, parents and staff • Contextual safeguarding discussion with students re unsafe areas in and out of school • Learning walks and student voice 	Discuss outcomes with DSL	
Pupil Voice	Hold elections for pupil council or hold a meeting or liaise with who oversees this. Include safeguarding as a standing item on the agenda.		
Safer Recruitment	Arrange for an independent check of the Single Central Record (HR for example).		
External Providers	Liaise with any external providers using the academy site to ensure that they are aware of safeguarding policies and procedures and meet all necessary requirements.		
	Check your external speaker policy is fit for purpose and being used when any speakers or external providers visit the academy.		
Communication with parents	<p>Share safeguarding information in the parent newsletter. Suggested topics:</p> <ul style="list-style-type: none"> • Road safety and staying safe during the winter months • Online safety 		

National events this month	<ul style="list-style-type: none"> • Black History Month • World Mental Health Day • ADHD Awareness Month • International Day of the Girl Child (UNICEF) • Anti-slavery Day 		
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November	What to do DSL	What to do Safeguarding AC governor	RAG
Training	<p>Suggested topics to cover in staff training or briefings this month:</p> <ul style="list-style-type: none"> • Radicalisation and Extremism (see free online training here: https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html) • Sexual harassment and abuse 		
	<p>Check that the DSL and DDSs have all attended Prevent-specific training within the last two years and book onto EduCare training if necessary.</p>		
	<p>Test all new staff and ECT on understanding of Keeping Children Safe in Education (based on training delivered in September).</p>		
Parents	<p>Review the academy's approach to parental engagement. This could include:</p> <ul style="list-style-type: none"> • Parent council or PTA; • Ofsted parent survey (see link for materials to promote this: https://parentview.ofsted.gov.uk/link-to-us); and/or • Parent contact audit (to ensure all parents have been contacted once so far this term). 		
Site Safety	<p>Complete a Safeguarding site walk.</p>		
	<p>Audit the academy site from a safeguarding perspective.</p> <ul style="list-style-type: none"> • Check safeguarding information is visible around school as necessary. 		

	<ul style="list-style-type: none"> • Check for insecure data – unlocked computers, printed data on desks, medical information etc. • Include the pupil council and seek views on where children feel safe and where they don't feel safe. • Observe entry and exit from school and consider if any changes or improvements are required. 		
Record-keeping	Audit pupil safeguarding files to ensure all actions have been added and files are complete.		
Documentation	Review Prevent risk assessment and update using local profile. Review all risk assessments and ensure updated.		
Communication with parents	Share safeguarding information in the parent newsletter. Suggested topics: <ul style="list-style-type: none"> • Anti-bullying 		
National events this month	<ul style="list-style-type: none"> • Anti-bullying week • Men's Health Awareness Week (Movember) • Road Safety Week • Universal Children's Day 		

December	What to do DSLs	What to do Safeguarding AC governor	RAG
Training	Suggested topics to cover this month: <ul style="list-style-type: none"> • Mental Health • Domestic abuse and violence 		
	Sign up to Local Authority DSL Forums for this term.		
	Prepare any training slides/resources for INSET days or allocate any EduCare modules to key staff for next year.		
	Check any new staff have completed EduCare training and check all staff have		

	now completed all training allocated for this period		
Communication with parents	Share safeguarding information in the parent newsletter. Suggested topics: <ul style="list-style-type: none"> • Helplines for the Christmas holidays • Keeping children safe over holidays • Online safety and tech safety 		
Vulnerable children	Review vulnerable children list and provide relevant children with additional information about sources of support over the holidays.		
	Contact social workers as necessary to update them with any concerns prior to the Christmas holidays.		
	Review alternative provision placements and progress towards re-integration.		
	DSL to meet with the Designated Teacher for Looked After Children to review progress and discuss any concerns.		
Promoting educational outcomes	Review progress and attainment of vulnerable children and children with a social worker.		
SEND children	Review safeguarding of children with SEND Audit current practice and consider further actions		
National events this month	<ul style="list-style-type: none"> • Christmas Jumper Day (Save the Children) • Comic Relief or Children in Need 		

January	What to do DSLs	What to do Safeguarding AC governor	RAG
Governance	Report to governing on key actions and data		
Training	Suggested topics to cover this month:		

	<ul style="list-style-type: none"> • Refresher on four types of abuse, signs and symptoms of abuse and processes for referral. • Child on child abuse refresher • Adverse Childhood Experiences 		
Promoting educational outcomes	Share relevant information about vulnerable children and those with a social worker to promote educational outcomes for this cohort. See Keeping Children Safe in Education, for further details.		
Curriculum	Review Relationships, Sex and Relationships and Health Education curriculum. Review Prevent duty and British Values in curriculum.		
Mental Health and Wellbeing	Review support and provision for children experiencing mental health issues and implement any necessary changes.		
	Review systems for identifying and referring mental health issues. See Excalibur policy on MHWB for children and referral form on Trust Safeguarding SharePoint.		
	Include a mental health update in the next report to AC governors.		
Planning ahead	Review training opportunities for staff over the course of this term and book onto any relevant training via EduCare.		
Communication with parents	Share safeguarding information in the parent newsletter. Suggested topics: <ul style="list-style-type: none"> • Healthy living 		
National events this month	<ul style="list-style-type: none"> • Brew Monday (Samaritans) 		

February	What to do DSLs	What to do Safeguarding AC Governor	RAG
Training	Suggested topics to cover this month: <ul style="list-style-type: none"> • Child Sexual Exploitation • Online Safety 		

	<ul style="list-style-type: none"> County lines 		
Self evaluation	<p>Review impact of safeguarding – pupil voice, learning walks, discussion with parents and staff</p> <p>Review action plan and add any new actions</p>	Review action plan with DSL and feedback from LA audit	
Pupil Voice	Carry out a pupil safeguarding survey, analyse results and implement any necessary changes.		
Safer recruitment	Check SCR		
Planning ahead	Check that all relevant staff have had safer recruitment training and book staff onto training if necessary.		
National events this month	<ul style="list-style-type: none"> Sexual Abuse and Sexual Violence Awareness Week LGBT History Month Children's Mental Health Week NSPCC Number Day Safer Internet Day 		

March	What to do DSLs	What to do Safeguarding AC Governor	RAG
Governance	Safeguarding report to Academy Committee to include review of impact and MHWB	Ensure safeguarding review is on agenda of Academy Committee	
Training	<p>Suggested topics to cover this month:</p> <ul style="list-style-type: none"> Child Criminal Exploitation and Serious Violence Children with additional vulnerabilities (SEND, LGBTQ+, Young Carers) 		
Pupils	Ensure transition day plans are in place. Plan how you will organise and approach meetings with parents or relevant staff at feeder schools (if applicable) to share SEND and safeguarding information appropriately in the summer term.		

	Review mental health and wellbeing support for young people completing exams this year.		
Self Evaluation - Attendance	Safeguarding review of attendance – alternative provision, unexplained absence, SEND absence, absence for students on CP plans, child missing in education Add to action plan any new actions after review	Discuss results of attendance review and actions required with DSL	
Vulnerable children	Review vulnerable children list and provide relevant children with additional information about sources of support over the holidays.		
	Contact social workers as necessary to update them with any concerns prior to the Easter holidays.		
	Review alternative provision placements and progress towards re-integration.		
Promoting educational outcomes	Review progress and attainment of vulnerable children and children with a social worker.		
Communication with parents	Share safeguarding information in the parent newsletter. Suggested topics: <ul style="list-style-type: none"> • Online Safety • Looking after your child's mental health 		
National events this month	<ul style="list-style-type: none"> • Eating Disorders Awareness Week • No More Week (Domestic Violence and Abuse) • Young Carers Day • Stop CSE Day • Family Safety Week (March/April) 		

April	What to do DSLs	What to do Safeguarding AC Governor	RAG
Training	Suggested topics to cover this month: <ul style="list-style-type: none"> • Children missing education • Homelessness 		

	Sign up to Local Authority DSL Forums for the summer term.		
	Review safeguarding team training and book any relevant courses before the end of the year.		
	Ensure all new staff have been allocated and completed training		
Promoting Educational Outcomes	Share relevant information about vulnerable children and those with a social worker in order to promote educational outcomes for this cohort. See Keeping Children Safe in Education (2020), page 100 for further details.		
Self evaluation – behaviour	Review of behaviour management – are children on CP plan monitored re behaviour, are records of reasonable force in place following the Trust policy (see SharePoint site), are positive handling plans in place and being reviewed.	Discuss with DSL outcome of behaviour review	
Vulnerable children	Review vulnerable children list, follow up any outstanding referrals (use the NCC escalation policy if necessary) and ensure records are up to date.		
Safer Recruitment	Arrange for an independent check of the Single Central Record if not already done through Trust review or HR review		
Looked-after and previously looked-after children	DSL to meet with the Designated Teacher for looked-after and previously looked-after children to review progress and discuss any concerns.		
Communication with parents	Share safeguarding information in the parent newsletter. Suggested topics: <ul style="list-style-type: none"> • Attendance 		
Work Experience	Review safer recruitment procedures for those supervising children on work experience (if applicable).		

May	What to do DSLs	What to do Safeguarding AC Governor	RAG
Training	Suggested topics to cover this month: <ul style="list-style-type: none"> Children in the court system and children with family members in prison 		
	Plan staff training for September and over the next year		
Self Evaluation - Online Safety	Review the academy's approach to online safety, including; <ul style="list-style-type: none"> the curriculum; filtering and monitoring systems; how the academy keeps children safe when using their own phones in school; and sharing information with parents. Logs Acceptable use policy Update action plan accordingly Send copy of review to Excalibur Head of Safeguarding	Discuss outcomes of online safety review	
Communication with parents	Share safeguarding information in the parent newsletter. Suggested topics: <ul style="list-style-type: none"> How the academy keeps children safe online Mental Health Awareness Week 		
	Review parent/carers access to safeguarding information – translations, access re literacy level		
National events this month	<ul style="list-style-type: none"> Mental Health Awareness Week 		

June	What to do DSLs	What to do Safeguarding AC Governor	RAG
Training	Suggested topics to cover this month: <ul style="list-style-type: none"> • Female Genital Mutilation • So called 'honour-based' abuse and forced marriage (see link to free Home Office training here: https://www.virtual-college.co.uk/resources/free-courses/awareness-of-forced-marriage) 		
Record-keeping	Complete an audit of safeguarding and child protection files.		
	Begin to prepare outgoing pupil safeguarding files for transfer.		
Self evaluation – Prevent	Review Prevent duty and understanding - Training Staff voice Referrals	Discuss with DSL outcome of reviews	
Transition	Begin to hold meetings to share safeguarding information (as necessary) prior to pupil transition.		
Communication with parents	Share safeguarding information in the parent newsletter. Suggested topics: <ul style="list-style-type: none"> • Transition • Child safety in the home 		
National events this month	<ul style="list-style-type: none"> • Child Safety Week • Pride Month • Carers Week 		

July	What to do DSLs	What to do Safeguarding AC Governor	RAG
Governance	End of year report to Academy Committee – data, case studies, trends, reviews and RAG action plan	Ensure safeguarding end of year report on Academy Committee agenda	
Reporting to Excalibur	Send copy of end of year report to Head of Safeguarding Begin work on safeguarding Excalibur data request and audit	Discuss with DSL Excalibur data request and audit	
Training	Suggested topics to cover this month: <ul style="list-style-type: none"> • Private fostering • Safer Working Practice 		
File transfer	Transfer all records as necessary for school leavers and obtain a receipt from the receiving school or college.		
	Put records into storage as necessary, in line with your academy data retention policy.		
Vulnerable children	Review vulnerable children list and provide relevant children with additional information about sources of support over the holidays.		
	Contact social workers as necessary to update them with any concerns prior to the summer holidays.		
	Review alternative provision placements and progress towards re-integration.		
	DSL to meet with the Designated Teacher for Looked After Children to review progress and discuss any concerns.		
Planning ahead	Review draft version of Keeping Children Safe in Education in preparation for September.		
	Plan how the academy will meet requirements under new guidance and legislation sent out by Head of Safeguarding.		

	Amend and update the academy Safeguarding and Child Protection policy in readiness for next academic year and Safeguarding Handbook.		
	Plan DSL rota for summer holidays (if necessary) and share relevant information with social workers/MASH.		
Promoting educational outcomes	Review progress and attainment of vulnerable children and children with a social worker.		
Communication with parents	Share safeguarding information in the parent newsletter. Suggested topics: <ul style="list-style-type: none"> • What's on in the local area over the summer • Sources of support during the school holidays 		
National events this month	<ul style="list-style-type: none"> • Samaritans Awareness Day (The Big Listen) 		