| | |
|---|---|
| **`Title** | Safeguarding and Child Protection |
| **Associated Policies** | • Anti-Bullying (TPO/STU/01)<br>• Behaviour and Discipline (TPO/STU/03)<br>• Complaints (TPO/QA/02)<br>• Disciplinary Procedure (TPO/STA/22)<br>• Safer Recruitment, SCR and Staff Files (TPO/STA/03)<br>• Professional and Safe Conduct (TPO/STA/10)<br>• Special Educational Needs and Inclusion (TPO/STU/05)<br>• Recruitment and Induction (TPO/STA/27)<br>• Student Care and Welfare (TPO/STU/06)<br>• Training and Development (TPO/STA/18)<br>• Whistle Blowing (TPO/STA/19)<br>• Online Safety (TPO/STU/12)<br>• Data Protection (TPO/STA/25)<br>• Single Equality (TPO/EO/01)<br>• Home Academy Agreement<br>• Dealing with Allegations Against Staff (TPO/STA/21)<br>• Peer on Peer Abuse (TPO/HS/12)<br>• Relationship Education, Relationships and Sex Education and Health Education Policy (TPO/STU/10) |

REVIEWED: SEPTEMBER 2021

NEXT REVIEW: SEPTEMBER 2022
*Or sooner if required*

## Contents

**Key Contacts for Safeguarding at Brooke Weston Trust** ..... 3
Aim of policy ..... 6
Principles this policy is based on ..... 6
Legislation and statutory guidance ..... 7
Definitions ..... 8
Equality statement ..... 10
Confidentiality and information sharing ..... 10
**Who is responsible for carrying out this policy?** ..... **11**
**Local Governing Bodies** ..... **12**
**Principals/Associate Principals** ..... **13**
**Designated Safeguarding Leads (DSL)** ..... **14**
**All staff** ..... **15**
Recognising abuse: Training ..... 16
**Recognising and responding to abuse: how to take action** ..... **18**
Specific safeguarding issues ..... 22
Female Genital Mutilation ..... 22

Radicalisation and extremism ..... 23
Children at greater risk of harm ..... 23
Peer on Peer Abuse ..... 23
Online Safety ..... 23
Children with Special Educational Needs and Disabilities ..... 23
Students with a social worker and those who previously needed a social worker ..... 23
Looked after children and previously looked after children ..... 24
Record keeping, confidentiality and information sharing ..... 24
Relationship Education, Relationship and Sex Education and Health Education ..... 25
Safer working practice ..... 26
Safeguarding concerns about and allegations against members of staff ..... 26
Allegations that may meet the harms threshold ..... 27
Allegations against staff ..... 27
Allegations against the Principal/Associate Principal ..... 27
Safeguarding concerns that do not meet the harm threshold (low level concerns) ..... 27
Reporting low level concerns ..... 28
Supply staff ..... 28
Recruitment and selection of staff ..... 28
Single Central Record ..... 30
Alternative Provision ..... 30
Abuse of trust ..... 30
Complaints ..... 31
Use of physical interventions ..... 31
Use of Academy premises for non-Academy activities ..... 31
Early years settings within academies ..... 31
Elective Home Education ..... 32
Policy Review ..... 32
APPENDIX A – Signs and symptoms of possible significant harm ..... 33
APPENDIX B – Further guidance for specific safeguarding concerns ..... 40
APPENDIX C – Main Issues within our locality ..... 58
APPENDIX D – Public Health Emergency COVID-19 arrangements ..... 63
APPENDIX E – Equality Impact Assessment ..... 70

## 1. Key Contacts for Safeguarding at Brooke Weston Trust

**1.1** Academy-level contacts, including the Principal, Designated Safeguarding Leads (DSL) and Deputy Safeguarding Leads (DepSL), are on pages 4-6.

**1.2** The Safeguarding Strategic Lead for Brooke Weston Trust (BWT) and the Safeguarding Advisors, who operate across all Trust Academies in a support and advisory capacity, can be contacted using the details below:

- Strategic Lead and Secondary phase Safeguarding Advisor:
  Claire Greaves 01536 532700 cgreaves@brookewestontrust.org
- Primary phase Safeguarding Advisor
  Sarah Fleming Sarah.Fleming@beanfieldprimary.org 01536 262000

**1.3 The Multi-Agency Safeguarding Hub (MASH)**

The MASH team can advise on whether a family needs early help or whether they meet the threshold for statutory child protection. They can be contacted by members of staff or parents/carers.

- North Northamptonshire: Telephone: 0300 126 7000.
- Cambridgeshire: Cambridgeshire County Council: 0345 045 5203.

**1.4 Local Authority Designated Officer (DO)**

North Northamptonshire
Email: LADOreferral@northamptonshire.gov.uk
Designated Officers Andy Smith - 01604 367862, Christine Lamb - 01604 362633
http://www.northamptonshirescb.org.uk/Academys/referrals-eha/designated-officer/

Cambridgeshire
Email: LADO@cambridgeshire.gov.uk Telephone 01223 727967 (office hours)
Designated Officers Janet Barr - 01223 727968, Paul Walker - 01223 727969, 01223 727967
https://www.safeguardingcambspeterborough.org.uk/children-board/professionals/lado/

**1.5 Out of hours service**

Should you need to contact children's Social Care urgently during the evening, at night or at the weekend, phone the out of hours team on 01604 626938 (Northamptonshire) or 01733 234724 (Cambridgeshire). An operator will answer the phone and take details of the problem and your contact details. They will then pass this information over to the duty social worker.

**1.6 Whistleblowing Officer**

Jane MacDonald (jane.macdonald@grettonprimary.org or 01536 770366)

**1.7 Other contacts**

NSPCC 0808 800 5000 or help@nspcc.org.uk – 24 hour service.
Childline 0800 1111 https://www.childline.org.uk/
Police 111 or 999 in emergency

| | Brooke Weston Academy | | | Corby Business Academy | | | Kettering Science Academy | | Corby Technical School | | | Thomas Clarkson Academy | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **Principal** Shaun Strydom | | | **Principal** Simon Underwood | | | **Principal** Tony Segalini | | **Principal** Angela Reynolds | | | **Principal** Richard Scott | |
| **DepSL** Angeline Annable | **DSL** Kate Jeyes | **DepSL** Nina Smith | **DepSL** Caren Brown | **DSL** Amy Harris | **DepSL** Yassin Elhasbaoui | | **DSL** Claire Greaves | | **DSL** Elizabeth James | | | **DSL** Alex Salmon | |
| **DepSL** Vicky Hilling | **DepSL** Wanda Gerard | **DepSL** Rebecca Waterson | **DepSL** Claire Robinson | **DepSL** Donna Lapsley | **DepSL** Laurence Woodcock | **DepSL** Laurie Chapman | **DepSL** Victoria Matcham | **DepSL** Beth Clark | **DepSL** Linda Arnold | **DepSL** Emma Toye | **DepSL** Ben Armstrong | **DepSL** Hayley Davies | **DepSL** Claire Ziebart | **DepSL** Claire Thomas |
| **DepSL** Stuart Littlejohn | **Safeguarding Governor** Vikki Williams | **DepSL** Sarah Mangan | **DepSL** Patrick Hallam | **Safeguarding Governor** Claudia Slabon | **DepSL** Francia Dickinson | | **Safeguarding Governor** Paul Jackson | | | **Safeguarding Governor** Gary Campbell | **DepSL** Kieron Chatfield | **DepSL** Kate Allgood | **Safeguarding Governor** Jan Hutchinson | **DepSL** Emma Flisher |

| | Beanfield Primary | | | Peckover Primary | | | Compass Primary | | Gretton Primary | | | Oakley Vale Primary | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **Principal** Sam Eathorne | | | **Principal** Kate Kendal | | | **Principal** Jo Fallowell | | **Principal** Jane MacDonald | | | **Principal** Emma Goodwin | |
| | **DSL** Sarah Fleming | **DepSL** Charlie Smith | **DepSL** Louise Tombleson | **DSL** Esther Fletcher | **DepSL** Charlotte Salter | | **DSL** Fran Dunn | | **DSL** Jane MacDonald | | | **DSL** Julia Baulch | |
| **DepSL** Sam Eathorne | **DepSL** Callum Reilly | **DepSL** Julia Dickinson | **DepSL** Nikki Howell | **DepSL** Teresa Stiles | **DepSL** Sam McGovern | | **DepSL** Nicole Andrews | | **DepSL** Hannah Moore | | **DepSL** Claire Johnson | **DepSL** Becky Annetts | **DepSL** Andy Buffham |
| | **Safeguarding Governor** Stephen Prati | | | **Safeguarding Governor** David Oliver | | | **Safeguarding Governor** Reg Talbot | | **Safeguarding Governor** Tim Eaton | | | **Safeguarding Governor** Stephen Prati | |

| | |
|---|---|
| **Brooke Weston Academy** – 01536 396366<br>Kate Jeyes, Designated Safeguarding Lead, KJeyes@brookeweston.org<br>Nina Smith, Deputy Safeguarding Lead, NSmith@brookeweston.org<br>Wanda Gerard, Deputy Safeguarding Lead, WGerard@brookeweston.org<br>Angeline Annable, Deputy Safeguarding Lead, AAnnable@brookeweston.org<br>Vicky Hilling, Deputy Safeguarding Lead, VHilling@brookeweston.org<br>Stuart Littlejohn, Deputy Safeguarding Lead, SLittlejohn@brookeweston.org<br>Sarah Mangan, Deputy Safeguarding Lead, SMangan@brookeweston.org | **Beanfield Primary** – 01536 262000<br>Sarah Fleming, Designated Safeguarding Lead, Sarah.Fleming@beanfieldprimary.org<br>Julia Dickinson, Deputy Safeguarding Lead, Julia.Dickinson@beanfieldprimary.org<br>Callum Reilly, Deputy Safeguarding Lead, Callum.Reilly@beanfieldprimary.org<br>Sam Eathorne, Deputy Safeguarding Lead, Sam.Eathorne@beandfirldprimary.org<br>Charlie Smith, Deputy Safeguarding Lead, Charlie.Smith@beanfieldprimary.org |
| **Corby Business Academy** – 01536 303120<br>Amy Harris, Designated Safeguarding Lead, Amy.Harris@corbybusinessacademy.org<br>Caren Brown, Deputy Safeguarding Lead, Caren.Brown@corbybusinessacademy.org<br>Yassin Elhasbaoui, Deputy Safeguarding Lead, Yassin.Elhasbaoui@corbybusinessacademy.org<br>Laurence Woodcock, Deputy SL, Laurence.Woodcock@corbybusinessacademy.org<br>Donna Lapsley, Deputy Safeguarding Lead, Donna.Lapsley@corbybusinessacademy.org<br>Claire Robinson, Deputy Safeguarding Lead, Claire.Robinson@corbybusinessacademy.org<br>Patrick Hallam, Deputy Safeguarding Lead, Patrick.Hallam@corbybusinessacademy.org<br>Francia Dickinson, Deputy Safeguarding Lead, Francia.Dickinson@corbybusinessacademy.org | **Compass Primary** – 01536 532707<br>Fran Dunn, Designated Safeguarding Lead, FDunn@compassprimary.org<br>Nicole Andrews, Deputy Safeguarding Lead, NAndrews@compassprimary.org |
| **Corby Technical Academy** – 01536 213100<br>Elizabeth James, Designated Safeguarding Lead, EJames@corbytechnicalschool.org<br>Linda Arnold, Deputy Safeguarding Lead, LArnold@corbytechnicalschool.org<br>Emma Toye, Deputy Safeguarding Lead, EToye@corbytechnicalschool.org<br>Ben Armstrong, Deputy Safeguarding Lead, BArmstrong@corbytechnicalschool.org<br>Kieron Chatfield, Deputy Safeguarding Lead, KChatfield@corbytechnicalschool.org | **Gretton Primary** – 01536 770366<br>Jane MacDonald, Designated Safeguarding Lead, Jane.MacDonald@grettonprimary.org<br>Hannah Moore, Deputy Safeguarding Lead, Hannah.Moore@grettonprimary.org |
| **Kettering Science Academy** – 01536 532700<br>Claire Greaves, Designated Safeguarding Lead, CGreaves@ketteringscienceacademy.org<br>Laurie Chapman, Deputy Safeguarding Lead, LChapman@ketteringscienceacademy.org<br>Victoria Matcham, Deputy Safeguarding Lead, VMatcham@ketteringscienceacademy.org<br>Beth Clark, Deputy Safeguarding Lead, BClark@ketteringscienceacademy.org | **Oakley Vale Primary** – 01536 461199<br>Julia Baulch, Designated Safeguarding Lead, JBaulch@oakleyvaleprimary.org<br>Becky Annetts, Deputy Safeguarding Lead, BAnnetts@oakleyvaleprimary.org<br>Andy Buffham Deputy Safeguarding Lead, abuffham@oakleyvaleprimary.org<br>Claire Johnson, Deputy Safeguarding Lead, CJohnson@oakleyvaleprimary.org |
| **Thomas Clarkson Academy** – 01945 585237<br>Alex Salmon, Designated Safeguarding Lead, ASalmon@thomasclarksonacademy.org<br>Hayley Davies, Deputy Safeguarding Lead, HDavies@thomasclarksonacademy.org<br>Claire Ziebart, Deputy Safeguarding Lead, CZiebart@thomasclarksonacademy.org<br>Emma Flisher, Deputy Safeguarding Lead, EFlisher@thomasclarksonacademy.org<br>Claire Thomas, Deputy Safeguarding Lead, CThomas@thomasclarksonacademy.org<br>Kate Allgood, Deputy Safeguarding Lead, KAllgood@thomasclarksonacademy.org | **Peckover Primary** – 01945 584741<br>Esther Fletcher, Designated Safeguarding Lead, efletcher@peckoverprmary.org<br>Kate Kendal, Deputy Safeguarding Lead, kkendal@peckoverprimary.org<br>Louise Tombleson, Deputy Safeguarding Lead, ltombleson@peckoverprimary.org<br>Sam McGovern, Deputy Safeguarding Lead, smcgovern@peckoverprimary.org<br>Nikki Howell, Deputy Safeguarding Lead, NHowell@peckoverprimary.org<br>Teresa Stiles, Deputy Safeguarding Lead, TStiles@peckoverprimary.org<br>Charlotte Salter, Deputy Safeguarding Lead, CSalter@peckoverprimary.org |

Contact information for the Chief Executive in the event of reporting a Principal/Associate Principal: acampbell@brookewestontrust.org / 01536 397000

## 2. Aim of policy

**2.1** The Brooke Weston Trust commits to providing an environment that safeguards and promotes the welfare, safety, health and guidance of our students. The BWT recognises the importance of the contribution it can make to protecting and supporting students across its academies**.**

**2.2** The aim of the policy is to:

- Protect children from any maltreatment or harm and prevent impairment of their health and/or development;
- To ensure each academy offers a provision of safe and supportive environment for all children under its care, with a culture of vigilance
- Ensure all staff, governors and visitors are aware of and clearly understand their statutory safeguarding responsibilities;
- Provide all staff, governors and visitors with the information required to meet their safeguarding duty and protect children from harm, including clear processes and procedures;
- Enable all children, no matter what their background or circumstance, to have optimum life chances beyond the Academy.

**2.3** BWT will therefore ensure the following arrangements are in place to safeguard and promote the welfare of children:

- Prevention: BWT will provide an environment and establish and maintain an ethos and culture where all students feel secure, are encouraged to talk and in which they are listened to carefully. Staff and volunteers will be trained regularly to understand their responsibilities with regard to reporting safeguarding or child protection concerns. Students are taught about safeguarding, including online, through various teaching and learning opportunities as part of a broad and balanced curriculum. Students are taught to recognise when they are at risk and how to get the help they need through PSHE, Wellbeing and mental health work and Anti-Bullying activities.
- Protection: BWT will ensure that each member of staff, governor and other visitor involved in regulated activity with students have an up to date DBS check and are sufficiently trained and supported to respond appropriately and sensitively to Child Protection concerns.
- Support: The BWT ethos provides structured systems of support for all students. This includes teaching students, as part of the curriculum, to keep themselves safe from all forms of abuse and appointing appropriately qualified and experienced staff (DSLs and DepSL's) to provide advice, training and support around safeguarding concerns.
- Working with parents and external agencies: The BWT will work closely with parents to ensure appropriate communications and actions are undertaken. The BWT will develop and maintain links with relevant external agencies in all matters relating to safeguarding and child protection. All academies assess the risks and issues in the wider community as part of the safeguarding curriculum.
- Commitment: BWT expects that everyone to share this commitment, creating a culture of vigilance.

## 3. Principles this policy is based on

**3.1** BWT recognises that:

- the welfare and safety of a student is always of paramount consideration and will work together with parents, carers and other agencies to safeguard and promote the welfare of the child;
- all children regardless of age, special needs or disability, racial or cultural heritage, religious belief, gender or sexual orientation have the right to be protected from ill treatment and neglect and to experience a good standard of care;
- all children have the right to be heard and that the wishes and feelings of the child should be sought and influence the decision making;

- all incidents and allegations of suspicious or poor practice or abuse will be taken seriously, listened to and responded to appropriately. This includes allegations raised through the whistleblowing procedures;
- there is a consistent understanding of acceptable behaviour of young people towards other young people and staff within the Trust and
- safeguarding is everyone's responsibility.

**3.2** All academies must be aware of and follow the procedures established by the Safeguarding Partnership Boards (North Northamptonshire and Cambridgeshire/Peterborough);

- Everyone must be alert to signs of abuse and neglect and follow procedures to ensure that children receive effective support, protection and justice. know to whom they should report any concerns or suspicions;
- BWT acknowledges that adults or other children can abuse children. We are committed to creating a culture of safety, that minimises the opportunity for any kind of abuse (including all forms of peer on peer abuse) through training, education and robust response procedures.
- Academies must have procedures (of which all staff and visitors are aware) for handling suspected cases of abuse of students, including procedures to be followed if a member of staff is accused of abuse, or suspected of abuse;
- A Designated Safeguarding Lead (DSL) and any Deputy Safeguarding Leads (DepSL's) will have responsibility for co-ordinating action within the Academy and liaising with other agencies. They must be the most appropriate person to advise on the response to safeguarding concerns.

**3.3** BWT commits to work in partnership with the North Northamptonshire Safeguarding Children Partnership (NSCP) and the Cambridgeshire and Peterborough Safeguarding Children Partnership and will follow their guidance and implement their systems and protocols for referring families for early help and reporting child protection concerns. The Partnerships will ensure that each academy is aware of issues within the community that are relevant to them. DSL's will ensure that all staff and governors are aware of those issues and systems for reporting and will provide local safeguarding updates as signposted by the partnership(s).

## 4. Legislation and statutory guidance

This policy sets out how the Brooke Weston Trust carries out its statutory responsibility to safeguard and promote the welfare of students. This includes:

**4.1** **Statutory Guidance**

- Keeping Children Safe in Education (KCSIE) (September 2021)
- Working Together to Safeguard Children (2018)
- Multi-agency statutory guidance on female genital mutilation (July 2020)
- Early Years Foundation Stage
- Teachers' Standards July 2021

**4.2** **Legislation**

- The Children Act 1989 and The Children Act 2004
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance)
- The Education Act 2002
- The Academy Staffing (England) Regulations 2009
- Part 1 of the schedule to the Non-Maintained Special Academies (England) Regulations 2015.
- The Equality Act (2010)
- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)

- The Childcare Act 2006
- Public Sector Equality Duty 2012

**4.3** The BWT also has regard relevant to **non-statutory guidance** relating to safeguarding, including:

- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2019 and the addendum added April 2020)
- Sexual violence and sexual harassment between children in schools and colleges (2021)
- Dealing with Allegations of Abuse Against Teachers and Other Staff (March 2012)
- Information Sharing: Guidance for Safeguarding Services (July 2018)
- Teaching Online Safety in schools (2019)
- DfE Guidance on Relationships education, relationships and sex education (RSE) and health education (July 2020)
- Laming Report 2003, Victoria Climbié, and "Baby Peter" Review 2009
- What to do if you are worried a child is being abused (2015)
- Bichard Inquiry 2003 - the Soham murders
- Jay Rotherham enquiry 2015
- Protecting Children From Radicalisation: The Prevent Duty 2015 Education (Independent Academy Standards) (England) Regulations 2014

**4.4** **Guidance**

From the North Northamptonshire and Cambridgeshire Safeguarding Children Partnership (NSCP):
http://www.northamptonshirescb.org.uk
https://www.safeguardingcambspeterborough.org.uk/children-board/

**4.5** **BWT policies**

This policy links with other Academy policies and procedures, including:

- Behaviour and discipline policy
- Peer on peer abuse policy
- Anti-bullying policy
- Professional and safe conduct policy
- Complaints policy
- Health and safety policy
- Attendance policy
- Online safety policy
- SEND policy
- Equality policy
- Relationship Education, Relationships and Sex Education and Health Education policy
- Supporting student with medical needs policy
- Curriculum policy
- Whistleblowing policy
- Acceptable use of IT Policy
- Privacy notices
- Our public health emergency (COVID-19) procedures are in Appendix D.

## 5. Definitions

**5.1** **Safeguarding and promoting the welfare of children** is defined in KCSIE (September 2021) 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.

**5.2** For the purposes of this policy, the term **'safeguarding'** refers to everything all academies do to keep children safe and promote their welfare, including (but not limited to):

- Supporting students' health, safety and well-being, including their mental health;
- Meeting the needs of children with special educational needs and/or disabilities;
- The use of reasonable force;
- Meeting the needs of children with medical conditions;
- Providing first aid;
- Educational visits;
- Intimate care and emotional wellbeing;
- Online safety and associated issues;
- Appropriate arrangements to ensure Academy security, taking into account the local context;
- Keeping children safe from risks, harm and exploitation; and
- Child protection.

**5.3** **Child protection** is part of safeguarding and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**5.4** **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. It can be perpetrated by an adult or adults known or unknown to a child, or a child or children known or unknown to the child. It can happen in person or online. Where abuse is perpetrated by another child, it is known as 'peer on peer' or 'child on child' abuse.

**5.5** **Neglect** is a form of abuse and 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[1].

**5.6** **Peer on peer abuse** refers to the abuse of a child or children perpetrated by another child or children. Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).[2]

**5.7** **Children** includes everyone under the age of 18.

**5.8** Within this policy:

[1] See Appendix C for more information about abuse and neglect.
[2] Keeping Children Safe in Education (2021)

- **Parent'** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents and foster carers.
- **'Staff'** or **'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the Academy.

**5.9** **Keeping Children Safe in Education** (September 2021) may be abbreviated to 'KCSIE'.

**5.10** Child abuse is covered by the term **"significant harm"** and is defined in the Adoption and Children Act 2002 in the following way:

- "harm" means ill-treatment or the impairment of health or development
- "development" means physical, intellectual, emotional, social or behavioural development
- "health" means physical or mental health
- "ill-treatment" includes sexual abuse and forms of ill-treatment which are not physical

## 6. Equality statement

**6.1** The Trust are committed to anti-discriminatory practice and recognise children's diverse circumstances. Some children are at an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We ensure that all children have the same protection, regardless of any barriers they may face.

**6.2** Please refer to Section 12 for further details about how we work to support children with special educational needs and disabilities (SEND) and the Equality Impact Statement (Appendix E).

## 7. Confidentiality and information sharing

**7.1** Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Academies have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between each Academy, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

**7.2** All academies adhere to the Data Protection Act (2018) and the General Data Protection Regulation (2018).

**7.3** <u>Sharing information with parents:</u>

- Each Academy will ensure the Safeguarding and Child Protection Policy is available publicly on each Academy's website and on the Brooke Weston Trust website.
- Where appropriate, staff will discuss any concerns about a child with the child's parents. The Designated Safeguarding Lead (DSL) will normally do this in the event of a concern, suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.
- If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

**7.4** <u>Consent:</u>
The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.

**7.5** As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.

**7.6** When considering whether, or not, to share safeguarding information (especially with other agencies), staff will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.

**7.7** All staff in each Academy will be made aware of their duties in relation to Data Protection and safeguarding, particularly in respect of confidentiality. This includes the following:

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding.
- Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.

## 8. Who is responsible for carrying out this policy?

**8.1** Safeguarding and promoting the welfare of children is **everyone's responsibility** – it is the duty of all staff and volunteers at BWT to accept and understand their responsibilities for safeguarding and to follow the agreed principles and procedures outlined in this policy.

**8.2** This policy extends to all governors, visitors and contractors who come into any Academy building.

**8.3** It is the duty of all staff employed by the BWT to attend all statutory training as deemed appropriate.

**8.4** The BWT maintains an attitude of 'it could happen here' and 'would this be good enough for my child'.

**8.5** **The Board of Directors** will:

- determine and keep under review the Trust's safeguarding policy;
- ensure that an effective organisation is created for the management of safeguarding and child protection concerns;
- ensure that the Trust promotes the correct attitude towards safeguarding and child protection with staff, volunteers and visitors; and
- monitor and evaluate the effectiveness of the academies' safeguarding practices and procedures.

**8.6** **The Chief Executive Officer (CEO)**

The CEO, as delegated by the Board of Directors, is accountable for the safeguarding of children across the BWT and responsible for the implementation of this policy across the Trust's academies. This will be undertaken through the support of the Safeguarding Review Group. The CEO reports to the Board of Directors on all safeguarding matters.

The CEO will

- ensure that the Trust has a suitable behaviour policy for Students and a staff behaviour policy or Code of Conduct.
- ensure that this policy is reviewed annually and ratified by the Board.

**8.7** **The Safeguarding Review Group**

The Safeguarding Review Group is a subcommittee of the Board. The core purpose of the Safeguarding Review Group is to initiate improvements in the Trust's working practices, systems and procedures to support effective safeguarding practice in each Academy's statutory and regulatory roles to protect young persons from potential or actual harm.

**8.8** It is the responsibility of the Safeguarding Review Group to ensure implementation of the Trust's safeguarding policies, monitoring the effectiveness and impact of the policies and recommend and implement improvements where needed.

**8.9** The Chair of the Safeguarding Review Group provides a (brief and by exception) written report to each Board meeting to report on risk in this area.

**8.10** **Local Governing Bodies**
It is the overarching responsibility of the local governing bodies to ensure that the Brooke Weston Trust's Safeguarding and Child Protection policy and procedures are in place at academy level and are operating effectively.

**8.11** The local governing body must appoint a nominated Safeguarding Governor to monitor the academies' implementation of the policy in more depth and report back to the Local Governing Body.

**8.12** All governors must attend all relevant training and development provided by the Trust, including the annual safeguarding refresher training and Prevent training. It is the responsibility of all governors to ensure they have read and understood the KCSIE document (Part 1 and Annex B) and this policy and have signed a declaration confirming this has been undertaken.

**8.13** Part 2 of KCSIE (September 2021) sets out the responsibilities of governing bodies and all governors will adhere to this guidance at all times. As part of these responsibilities the governors will:

- ensure that they comply with their duties under statutory guidance and legislation;
- work to facilitate a whole Academy approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedure and training at the Academy are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole Academy or college safeguarding approach and wider staff training and curriculum planning;
- ensure that the Academy takes into account local criteria for action and protocol for assessment and supply information as requested by the three safeguarding partners;
- ensure that the Academy has an effective child protection policy, which is published on the Academy website and/or available by other means and review this annually;
- ensure that the Academy has systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible;
- ensure that the Academy takes safeguarding concerns seriously and takes the wishes and feelings of children into account;
- ensure that there are systems in place for young people to safely express their views and give feedback on safeguarding practice;
- ensure that all staff undergo safeguarding and child protection training on induction;
- consider a whole-Academy approach to online safety, including the use of mobile technology in Academy;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- ensure that children are taught about safeguarding, including online safety. Please refer to the Online Safety Policy for further information;
- ensure that an appropriate safeguarding response for children who go missing from education is in place;
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead;
- ensure that appropriate filters and monitoring systems are in place to keep children safe online;
- ensure that there are appropriate procedures in place to manage safeguarding concerns, or allegations against staff; and
- respond to allegations of abuse against the headteacher. The CEO will act as the 'case

manager' in the event that an allegation of abuse is made against the Principal.

**8.14** The **Executive Principal/Chief Education Officer (secondary)** have strategic responsibility for the standards in Trust academies as defined by the Ofsted framework. It is the responsibility of the Executive Principals to:

- ensure that a suitable organisation within each academy is in place to satisfy the duties and arrangement as outlines in this policy, including ensuring that appropriate staffing with the required time, funding, resources and support is in place;
- ensure, in co-ordination with the Principal, that all relevant Senior Managers are capable and competent in their given roles and provided with suitable and sufficient information and instruction; and
- ensure each academy has a nominated Safeguarding Governor.

**8.15** **Principals/Associate Principals** are accountable for the effective safeguarding of children in their Academy's and will:

- ensure that this policy is reviewed annually and ratified by the governing body;
- ensure that this policy and associated procedures, including the use of CPOMS, are adhered to by all staff and take action as necessary if not;
- ensure that staff (including temporary staff) and volunteers are informed of systems that support safeguarding, including this policy, as part of their induction.
- ensure that all staff are made aware of the named governor for safeguarding and the Designated Safeguarding Lead;
- promote an environment and culture of safety where students feel safe and listened to and this includes ensuring that the curriculum includes safeguarding and how to keep safe;
- ensure that the role of 'Designated Safeguarding Lead' is explicit in the role-holder's job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent;
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead;
- organise appropriate cover for the role of Designated Safeguarding Lead for any out of hours/out of term activities;
- appoint a 'Designated Teacher for Looked After and Previously Looked After Children' to promote the educational achievement of children looked after and previously looked after;
- ensure the whistle blowing policy and procedures have been disseminated to all staff and that any allegations against staff are responded to appropriately;
- ensure safe recruitment practice is followed when recruiting to posts.
- appoint a lead for online safety (usually the DSL – see Annex C KCSIE);
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with children;
- respond to allegations of abuse/concerns against all other members of staff and act as the 'case manager' in the event of an allegation of abuse/concerns made against another member of staff or volunteer, implementing the appropriate disciplinary and appeals procedures as required
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the Academy works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;
- safeguard children's wellbeing and maintain public trust in the teaching profession as part

of their professional duties (Teaching Standards, 2012);
- ensure that children's social care (from the host local authority or placing authority) have access to the Academy to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2021);
- ensure the relevant staffing ratios are met, where applicable (Early years providers and primary academies); and
- make sure each child in the Early Years Foundation Stage is assigned a key person (Early years providers).

**8.16 Designated Safeguarding Leads (DSL)**
The DSL is a member of the Senior Leadership Team. The DSL takes lead responsibility for child protection and wider safeguarding. Each Academy's DSL is listed on p. 4-6. The full responsibilities of the DSL are set out in Annex C, KCSIE (2021).

**8.17** When the DSL is absent, the Deputy DSL will cover. If they are not available, a member of SLT will cover. Any deputies will be trained to the same standard as the designated safeguarding lead. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

**8.18** The Designated Safeguarding Lead will:
- act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- be aware of and up to date with latest national and local guidance and requirements, ensuring this is shared with all key personnel.
- advise on the response to safeguarding concerns;
- liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children (2018);
- identify if children may benefit from early help;
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- support the Academy with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- refer cases to the police where a crime may have been committed;
- be available during Academy or college hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;
- undertake training to equip them with the skills to carry out the role and update this every two years;
- ensure all staff that work directly with children have read and understood Part 1 and Annex B of Keeping Children Safe in Education (September 2021);
- ensure all staff that do not work directly with children have read either Part 1 or Annex A (as appropriate) of Keeping Children Safe in Education (2021);
- update their knowledge and skills regularly and keep up with any developments relevant to their role;
- provide staff in Academy with the knowledge, skills and support required to safeguard children;
- ensure that all staff in the academy receive initial training and appropriate regular update training via whole staff training or bulletins on safeguarding, including how to recognise the signs and symptoms of abuse. This includes provision of training on how to report a

safeguarding concern through the Academy's CPOMS safeguarding referral system.

- ensure that all staff must have an understanding of child abuse, neglect and exploitation and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs and disabilities.
- take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- take responsibility for the transfer of safeguarding files when a child leaves the Academy;
- monitor Academy mobility, and in particular take responsibility for those children removed from the Academy is in adherence with LA and Trust guidance, ensuring that all reasonable steps are taken to ensure that the child is safe;
- attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- ensure that parents and carers are informed of the safeguarding procedures by a statement in the Academy prospectus, access to the policy and procedures on the Academy website and reminders via newsletters.
- work closely with other relevant education professionals (e.g. SENCO, Virtual Academy Head) to ensure children with additional vulnerabilities are safeguarded;
- help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the Academy leadership team;
- promote a 'culture of safeguarding', in which every member of the Academy community acts in the best interests of the child;
- regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding at the Academy;
- work with the Academy Business Manager/HR to ensure that safe recruitment checks are carried out and that the Academy's Single Central Record is up to date in line with statutory requirements, as set out in KCSIE and
- Liaise with the headteacher regarding safeguarding cases and issues.
- The DSL in each Academy can be contacted by email (see p. 5 and 6).

**8.19 All staff**

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children. All staff:

- have a responsibility to provide a safe environment, where children can learn;
- will be trained so that they know what to do if a child tells them that he/she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse and neglect;
- will be made aware of systems in the Academy that support safeguarding and child protection;
- use CPOMS to record concerns, decisions and actions;
- all staff must also be alert to the signs of harm and abuse;
- must be aware of who the DSL and DDSL's are within the academy and have their contact details;
- will be made aware of safeguarding issues that put children at risk of harm and behaviours associated with these risks;
- should ensure that they know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;

- will be made aware of and should be clear on the Academy's policy and procedures with regards to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;
- will be made aware of the early help process and understand their role in it;
- should be prepared to identify children who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;
- may be required to support social workers and other agencies following a referral;
- will be made aware of the process for making referrals to Children's Social Care (though the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- should be prepared to make referrals to the MASH if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety;
- will receive safeguarding updates throughout the year as part of continuous professional development;
- will be encouraged to contribute to the development of safeguarding policy and practice;
- should always seek advice from the Designated Safeguarding Lead if they are unsure; and
- all teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).

**8.20** All staff will be made aware of the systems and documents that support safeguarding, including this policy, the staff code of conduct, the role and identity of the DSL and any deputies, the behaviour policy and the safeguarding response to children who go missing from education.

**8.21** All staff that work directly with children will be provided with a copy of, and must read, Part 1 and Annex B of Keeping Children Safe in Education (September 2021) annually and will receive annually updated training on their safeguarding roles and responsibilities. Staff that do not work directly with children will be provided with a copy of Part 1 of Keeping Children Safe in Education (2021) and must read this document. In either case, all members of staff must sign a declaration confirming they have done this.

**8.22** Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of Academy safeguarding policy or practice, they speak to the Designated Safeguarding Lead immediately, so that additional training can be arranged.

**8.23** The **Trust Safeguarding Lead and Advisor** will work in an advisory capacity across the Trust, providing support and guidance to Principals, DSL's and DDSL's on all safeguarding related matters. The main areas of responsibility include:

- Strategic oversight of developing safeguarding and child protection ensuring statutory compliance and development of this area
- Provision of advice, guidance and support to Academy's on complex safeguarding cases
- Sharing of best practice through DSL networking sessions across BWT academies
- Manage the safeguarding and Prevent audit processes to ensure sufficient quality assurance of safeguarding systems within academies
- **Each academy Principal will retain accountability for all safeguarding-related matters within their academy.**

## 9. Recognising abuse: Training

**9.1** The Trust is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. We strive to ensure that staff fully understand their safeguarding

responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect or harm.

**9.2** All staff should have an understanding and awareness of safeguarding incidents and/or behaviours associated with factors outside Academy and home. These should be considering the context within which such incidents or behaviours occur, known as 'contextual safeguarding' (definition included in Appendix B).

**9.3 All staff**

**9.3.1** All staff members must undertake safeguarding and child protection training at induction (including online safety and whistle-blowing procedures) to ensure they understand the Academy's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.

**9.3.2** All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. This should be renewed every 2 years.

**9.3.3** Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

**9.3.4** Teachers and support staff as relevant to their role will receive training to ensure that they can manage behaviour effectively to ensure a good and safe educational environment and they should have a clear understanding of the needs of all Students.

**9.3.5** Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

**9.3.6** Volunteers will receive appropriate training, as applicable.

**9.4 The DSL and Deputy DSLs**

**9.4.1** The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years.

**9.4.2** In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

**9.4.3** They will also undertake Prevent awareness training and online safety training.

**9.5 Governors**

**9.5.1** All governors receive safeguarding training, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

**9.5.2** In the event that a governor of a BWT Academy has been unable to attend safeguarding training sessions by the specified date for completion, their position as a governor will be reviewed by the Chair of Governors in discussion with the Principal/Associate Principal.

**9.5.3** An annual record of training will be maintained.

**9.5.4** As the CEO may be required to act as the 'case manager' in the event that an allegation of abuse is made against a Principal or Associate Principal, they should receive training in managing allegations for this purpose.

**9.6 Recruitment (interview panels)**

**9.6.1** At least one person conducting any interview for a post at the Academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2021), and will be in line with local safeguarding procedures.

**9.7 Supervision**

**9.7.1** All DSL's and Deputy DSL's who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

**9.8 Specific safeguarding issues**

**9.8.1** Staff will also receive specific training on the following issues and action will be taken if the Academy suspects that a child is at risk of or is the victim of;

- physical abuse;
- sexual abuse;
- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation (including involvement in county lines);
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- online safety;
- peer on peer abuse;
- radicalisation;
- relationship abuse;
- serious violence;
- sexual violence or sexual harassment (including peer on peer abuse);
- sexting or sharing of youth produced sexual imagery;
- so-called 'honour-based' abuse;
- trafficking and modern slavery;
- upskirting; and
- substance abuse

## 10. Recognising and responding to abuse: how to take action

**10.1** If a member of staff, parent or member of the public is concerned about a student's welfare, they should report it to the DSL as soon as possible. On occasions when the DSL is not available, it should be reported to the deputy safeguarding lead/s immediately. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.

**10.2** Although any member of staff can make a referral to children's social care, where possible there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

**10.3** All staff will be alert to indicators of abuse (including peer on peer abuse) and will report any of the following to the Designated Safeguarding Lead immediately;

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may indicated that they have been

harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child's presentation;
- any indicators that a child may be experiencing peer on peer abuse;
- any concerns relating to people who may pose a risk of harm to a child; and/or
- any disclosures of abuse that children have made.

**10.4** More information about our approach to peer on peer abuse (including sexual violence and sexual harassment) can be found at Appendix B. Please aso refer to the Peer on Peer Abuse Policy.

**10.5** For signs and indicators of significant harm (physical abuse, emotional abuse, neglect and sexual abuse), please see Appendix A of this policy.

**10.6** For more information regarding specific safeguarding issues, please see Appendix B of this policy.

**10.7** **Reporting a Concern**

If a child discloses that he or she has been abused in some way, the member of staff/volunteer will:
- listen to what is being said without displaying shock, disbelief or other emotion;
- accept what is being said;
- allow the child to talk freely;
- reassure the child, but not make promises which might not be possible to keep;
- never promise a child that they will not tell anyone – it may not be in their best interest;
- reassure them that what has happened is not their fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify – do not investigate;
- not criticise the alleged perpetrator;
- explain what has to be done next and who has to be told;
- reassure the victim they are being taken seriously and they will be supported and kept safe. A victim should never be given the impression they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report;
- make a written record (see Record Keeping), informing the child that you are doing so; and
- pass the information to the DSL and DDSL without delay, either in person (for immediate, priority cases) or through the use of CPOMS (lower-level concerns) depending on the nature of the concern.
- From this point on, the DSL or the DepSL will keep a confidential record of all comments, actions and observations. These records will be filed, kept securely and access will only be given to the DSL, the DepSL and the Executive Principal/Principal/Associate Principal.
- The DSL or the DepSL will automatically inform the Executive Principal/Principal/Associate Principal of any new cases and from that point on, any further developments. The DSL or the DepSL will then advise on the next step or steps and liaise with any external agencies outside Academy that may be necessary
- The academy will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL or the DepSL will make contact with the parent in the event of a concern, suspicion or disclosure
- However, if the DSL or the DepSL believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care/Multi Agency Safeguarding Hub (MASH).
- If the DSL or the DepSL believes that "a child is experiencing or may have already experienced abuse or neglect" or "is at risk of suffering significant harm" either now or in the future then the academy will comply with the procedures of the Local Safeguarding Children Board.

**10.8** If a child is suffering or likely to suffer, or in immediate danger

Any member of staff that suspects or has evidence of child abuse must **immediately** contact the DSL or the DepSL within the Academy for handling these issues.

Where possible, there should be a conversation with the Designated Safeguarding Lead but a referral must be made if a child may be suffering or at risk of suffering harm. Anyone can make a referral to children's social care. If anyone other than the DSL makes a referral to children's social care or to the police, they should inform the DSL as soon as possible.

**10.9** If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action.

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the Northamptonshire Thresholds Guidance. If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 6.1 for more details.

All concerns, discussions and decisions will be recorded in writing.

The DSL will provide guidance on the appropriate action. Options will include:

- managing any support for the child internally via the Academy's own pastoral support processes;
- seeking advice from the local early help co-ordinator/s;
- an Early Help Assessment; or
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

**10.10** Early help

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Lead any ongoing/escalating concerns so that consideration can be given to a referral to children's social care if the child's situation does not appear to be improving.

We recognise that any child can be the victim of abuse and may benefit from early help. However, we will be particularly vigilant to potential need for early help if a child;

- is disabled or has certain health conditions and has specific additional needs;

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the Academy day.

**10.11** Referrals

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the Academy/college will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The academy will be guided by MASH as to the appropriate outcome e.g. complete an Early Help Assessment (EHA) or refer to a relevant specialist agency.

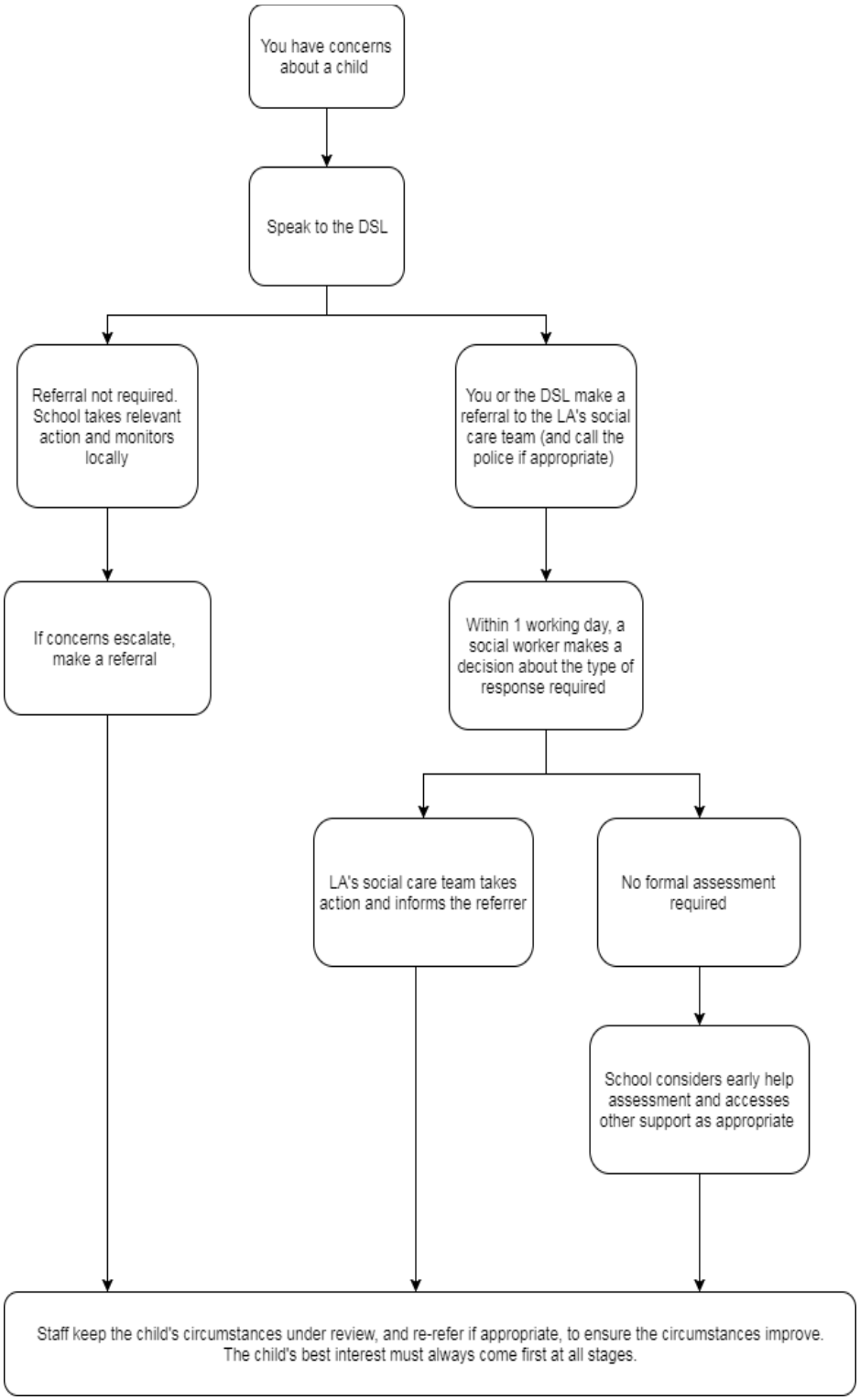
All Child Protection records will be maintained in a confidential file at the academy. The protocols as outlined in the Data Protection Policy must be followed.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Contact details for the MASH below.

Figure 1




## 11. Specific safeguarding issues

### 11.1 Female Genital Mutilation

FGM is a collective term for all procedures involving the partial or total removal of external female genitalia for cultural or other nontherapeutic reasons. Please refer to Appendix B, Section 9, for more information.

**11.2 Radicalisation and extremism**
The Brooke Weston Trust has a statutory duty under Section 26 of The Counter-Terrorism and Security Act 2015 and the statutory Prevent Guidance 2015 to have due regard to the need to prevent people from being drawn into terrorism. Please refer to Appendix B, Section 11, for more information.

**11.3 Children at greater risk of harm**
The Trust recognises that some children need a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage. Please refer to Appendix B, Section 21, for more information.

**11.4 Peer on Peer Abuse**
Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. All academies take peer on peer abuse seriously and will respond immediately. Please refer to the Peer on Peer Abuse Policy for full details.

**11.5 Online Safety**
Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, the Online Safety Policy is written in line with KCSIE (September 2021) 'Teaching Online Safety in Schools' 2019, statutory RSHE guidance 2019 and other statutory documents. It complements existing and forthcoming subjects including Health, Relationships and Sex Education, Citizenship and Computing; it is designed to sit alongside the Trust's statutory Safeguarding and Child Protection Policy. Any issues and concerns with online safety must follow safeguarding and child protection procedures. Please refer to the Online Safety Policy for full details.

## 12. Children with Special Educational Needs and Disabilities

**12.1** The Trust fully recognises the importance of awareness around additional vulnerabilities of children with special educational needs (SEN) and disabilities and the additional safeguarding challenges.

**12.2** Additional barriers can exist when recognising abuse and neglect in this group, including:

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

**12.3** All academies identify students who might need more support to be kept safe or to keep themselves safe, and put support in place. Academies offer extra pastoral support for Students with SEN and disabilities. Staff at each academy will be supported through training. Further information can be found in the BWT SEND Policy.

## 13. Students with a social worker and those who previously needed a social worker

**13.1** Students may need a social worker due to safeguarding or welfare needs. The Trust 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. We work with the local authority and external agencies to ensure there is effective support for this group of children.

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

**13.3** Where a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student'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; and
- the provision of pastoral and/or academic support.

**13.4** Contact plans are created for children with a social worker, and other children who we have safeguarding concerns about, for circumstances where they won't be attending the Academy (for example in a local lockdown during Covid) or they would usually attend but have to self-isolate. Each child has an individual plan with arrangements according to need. These plans are shared as required.

## 14. Looked after children and previously looked after children

**14.1** All staff must be aware of the issues regarding safeguarding for looked after and previously looked after children which is identified as a vulnerable group.

**14.2** All academies will have staff with the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, they will ensure that:

- appropriate staff have relevant information about children's 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 school heads;
- each Academy has a Designated Teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance; and
- the designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

**14.3** 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; and
- work with virtual school 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.

## 15. Record keeping, confidentiality and information sharing

**15.1** All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

**15.2** When a child has made a disclosure, the member of staff/volunteer should;

- record as soon as possible after the conversation, using CPOMS
- not destroy the original notes in case they are needed by a court;
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- draw a diagram to indicate the position of any injuries if relevant; and
- record statements and observations rather than interpretations or assumptions

**15.3** All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

**15.4** The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

**15.5** Records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

**15.6** Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with the records retention schedule.

**15.7** If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

**15.8** The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 is in place to protect the personal information of individuals. It does not prohibit information about children being shared with specific authorities if it is for the purposes of safeguarding children and individuals at risk. Information that could be relevant to keeping a child safe should be shared so that informed decisions can be made about a child's welfare. We have a duty of care for our students and safeguarding is of upmost importance to us. GDPR does not 'trump' safeguarding. Processing safeguarding data is necessary for compliance with our legal obligation to which Brooke Weston Trust is subject. Therefore, consent is not needed for the effective sharing of safeguarding information between an academy and relevant authorities.

**15.9** The Trust will uphold confidentiality at all times in line with the Data Protection Act Principles to ensure that information is:

- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than necessary
- Processed in accordance with the data subject's rights
- Secure

**15.10** In the event of a student who is being dealt with under the Academy's child protection procedures transferring to another Academy, the DSL will:

- Find out the name of the receiving Academy (and, where appropriate the Local Authority)
- Contact the relevant member of staff at that Academy to discuss the transfer
- Securely send all information relating to the student to the receiving Academy (and where relevant the Local Authority)
- Check with the receiving Academy that the student has actually arrived there on the expected day; and inform all relevant agencies of the transfer

**15.11** Upon receipt of any request regarding direct access to academy documentation on a Child Protection file, the Principal and DSL will be informed and a decision taken on the appropriate way forward in accordance with the Data Protection Policy.

**15.12** Any external individual or organisation contracted by the academies to work with academy students must report any child protection incidents or disclosures from students to the Principal or DSL at the earliest opportunity. Such bodies will, as part of their contractual arrangements with the academies, be required to work in accordance with the Trust's child protection and safeguarding policy.

## 16. Relationship Education, Relationship and Sex Education and Health Education

**16.1** Through the curriculum, staff will raise students' awareness and build their confidence and resilience so that they have a range of contacts and strategies to ensure their own protection and

that of others, recognising that students need opportunities to develop the skills they need to stay safe from abuse.
There should be opportunities within the curriculum for students to develop the skills they need to recognise and stay safe from abuse.

**16.2** All students have age appropriate Relationship/ Education and Relationship and Sex Education and Health Education. Please see the Relationship Education, Relationships and Sex Education and Health Education Policy.

**16.3** All students, through the curriculum, should be encouraged to be healthy, to stay safe, to enjoy and achieve, to make a positive contribution and to achieve economic wellbeing. There should also be opportunities for students to learn about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

## 17. Safer working practice

**17.1** All staff work to create and embed a culture of openness, trust and transparency, in which the Trusts values and expected behaviour (as set out in the Professional and Safe Conduct Policy) are constantly lived, monitored and reinforced by all staff.

**17.2** All staff must act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the Professional and Safe Conduct Policy, Acceptable Use Policy and Safer Recruitment Consortium document Guidance for safer working practice for those working with children and young people in education settings (September 2019).

**17.3** The Board, Governors and senior leaders will ensure that this policy is adhered to by:

- ensuring 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 through effective training;
- empowering staff to share any low-level safeguarding concerns;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage; and
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and
- helping to identify any weakness in the Academy's safeguarding system.

**17.4** Staff must adhere to the staff Professional and Safe Conduct Policy at all times. In the event of any concerns or allegations, the school will deal with them promptly, in line with local guidance and KCSIE (September 2021).

**17.5** Staff use of mobile phones

- Staff are allowed to bring their personal phones to school for their own use, but will 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 students. Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- The General Data Protection Regulation and Data Protection Act 2018 will be adhered to when taking and storing photos and recordings for use in the school.

## 18. Safeguarding concerns about and allegations against members of staff

**18.1** The Trust recognises the possibility that adults working in the Academy may harm children, including governors, volunteers, supply teachers and agency staff.

**18.2** Allegations that may meet the harms threshold

The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the Academy or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

- 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 a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This includes behaviour or incidents that have occurred in the Academy and outside of the Academy.

Staff who are concerned about the conduct of a colleague towards a student may worry that they have misunderstood the situation and may wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The Trust's Whistleblowing policy and Dealing with Allegations of Abuse Against Staff Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

**18.3** Allegations against staff

If a concern or allegation of abuse arises against any member of staff, supply teacher or volunteer (other than the Principal/Associate Principal) must be reported to the Principal immediately and not discussed directly with the person involved. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. Alternatively, staff are able to report the concern through the Trust whistleblowing procedure or directly to the Designated Officer (details on p.3). Further detail is provided in the Dealing with Allegations of Abuse Against Staff Policy.

The Principal/Associate Principal should consider if the concern or allegation meets the threshold for Designated Officer intervention. Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made and the police will be contacted if necessary.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, or would have been removed if they had not have resigned.

**18.4** Allegations against the Principal/Associate Principal

Allegations against the Principal must be reported to the CEO.

**18.5** Safeguarding concerns that do not meet the harm threshold (low level concerns)

In the event that there is a safeguarding concern about a member of staff, guidance outlined in Part 4, Section 2 of KCSIE (September 2021) will be adhered to.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to

consider a referral to the LADO.

**18.6** It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. All Academies will act quickly, proportionately and appropriately in the event of a low level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.
Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (September 2021).

**18.7** **Reporting low level concerns**
Low-level concerns should be reported to the Principal/Associate Principal. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept by the Principal/Associate Principal and/or HR.

The Principal may:

- Speak directly to the person who raised the concern (unless it has been raised anonymously).
- Speak to the individual involved and/or witnesses.

The Principal will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues within the Academy are identified, the Academy will either:

- take action through our disciplinary procedures;
- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

The Academy will retain information about low-level concerns until the member of staff is no longer employed by the Trust.

**18.8** <u>Supply staff</u>
Although the school/college does not directly employ supply teachers, any concerns or allegations against supply teachers are handled properly. No Academy will cease to use a supply teacher for safeguarding reasons without finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome. The Principal will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation.

The Academy will inform supply agencies of its process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. Informing supply agencies of our process for managing allegations includes inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant school policies. Please also refer to the Managing Allegations Against Staff Policy.

## 19. Recruitment and selection of staff

**19.1** The BWT recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff and volunteers working at the academy are suitable to do so, therefore, they do not pose any kind of risk to our students.

**19.2** The recruitment and selection of all employees will be made on merit and in accordance with the provisions of Employment Law, the Education Act 2011, the Academy Staffing (England) Regulations 2009 and the statutory guidance, *Safeguarding Children and Safer Recruitment in Education Settings* and the Academy's equal opportunities policy. See also https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006

**19.3** Safer recruitment should be reflected in every stage of the process and safeguarding judgements need to be made, in differing degrees, in relation to all those that a student in Academy may come into contact with, as they may be perceived to be safe and trustworthy adults.

**19.4** The Trust will ensure that its recruitment and selection procedures include clear systems to vet all applicants before they are placed at a Academy including:

- All advertisements for vacancies across the Trust will make reference to the Trust's commitment to safeguarding children and young people
- An Academy application form is completed for all applicants
- Following up two professional references, including at least one who can comment on the applicant's suitability to work with children
- Requesting copies of original qualifications
- Ensuring appropriate police checks are made and enhanced DBS disclosures obtained
- Reference to and awareness of safeguarding issues is addressed during the interview process
- Please refer to the Recruitment and Induction Policy for further information, including a checklist of pre-employment checks.

**19.5** The Principal will ensure that members of the Senior Management team have received training in Safer Recruitment and that all interview panels have a member of trained staff on them. Safer Recruitment training should be renewed at least every 3 years.

**19.6** Where the Trust recruits temporary or supply staff through an agency, the Trust will ensure the following through the relevant agency:

- References from the most recent placements
- Right to work documentation
- Ensuring appropriate police checks and an enhanced DBS disclosure is in place
- Documentary evidence of the candidate's identity

**19.7** Each academy will ensure that the following procedures are followed for contractors on site:

- Contractor to provide original and valid DBS certificate and photo ID to Academy/site for scrutiny. If approved then proceed to step 2, if rejected then refuse entry to contractor (notwithstanding option to provide escort)
- Acceptance by Academy/site of documentation.
- Site inserts copy of documentation into an "approved visitors" folder with register at reception. NB all documentation must be destroyed on completion of project.
- Contractor "signed into/onto" site and given formal site induction by Site Manager and safeguarding lead who outlines Safeguarding Policy/practice at earliest opportunity.
- Contractor issued with an "approved visitor" badge.
- Contractor conducts work.
- On departure signs out, returns badge and visit duration is recorded in approved visitor register.

- On subsequent visits contractor shows photo ID and signs in at reception. Reception refers to approved visitor register and records and alerts contractor to any known issues/risks/events.
- Site staff notified accordingly by reception staff.
- Approved visitor granted access to site to undertake work task.

## 20. Single Central Record

**20.1** Each academy will maintain a Single Central Record (SCR) of all Academy employees, agency staff, consultants, volunteers (including governors), contractors and any others involved in regulated activity (including Alternative Provision). This record will include:

- An identity check
- Barred list check
- An enhanced DBS check
- Prohibition from teaching check
- Further checks on people who have lived or worked outside the UK
- Check of professional qualifications, where required
- A check to establish the person's right to work in the UK
- Prohibition from management check, including section 128 when appropriate

**20.2** The SCR will be overseen and directly managed by the Principal, who is responsible for safeguarding in the academy and the academy safeguarding leadership team. It is the responsibility of the HR Administrator/equivalent within the academy to maintain the information on the single central record.

**20.3** Audits will be conducted by the Designated Safeguarding Lead on a termly basis and reported to the Safeguarding Lead.

**20.4** The details of an individual should be removed for the SCR once they no longer work for the Academy and/or Trust.

**20.5** A SCR will be maintained centrally for all Central Team and Trust-wide members of staff and Directors/subcommittee members. This will be shared with all Brooke Weston Trust academies as and when it is updated.

**20.6** For further information about DBS checks, please refer to the Trust's Disclosure and Barring Service Checks Policy.

## 21. Alternative Provision

**21.1** All academies are responsible for the safeguarding of their students when they have placed in an alternative provision.

**21.2** Academies must obtain a written statement from the provider that they have completed all the vetting and barring checks that are necessary on their staff. An annual QA check should take place, along with random spot and planned visits. It is essential that all students on the academy roll have their attendance checked daily and their progress and attainment at least once a half term. Regular contact with parents must be maintained.

## 22. Abuse of trust

**22.1** Inappropriate behaviour by staff towards students is unacceptable. Under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a student under 18 may be a criminal offence, even if that student is over the age of consent. Other examples of inappropriate behaviour can be found in the Professional and Safe Conduct Policy. Such offences will be handled in line with the Dealing with Allegations of Abuse Against Staff.

## 23. Complaints

**23.1** The Brooke Weston Trust's complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Complaints are managed by senior staff, the Principal/Associate Principal and governors and in exceptional circumstances the Chief Executive. Complaints from staff are dealt with under the Academy's complaints and disciplinary and grievance procedures (TPO/QA/02).

## 24. Use of physical interventions

**24.1** There is an absolute ban on the use by any member of staff of any form of corporal punishment. This includes any physical contact which is deliberately intended to punish a student, or which is primarily intended to cause pain, injury or humiliation.

**24.2** It is important to allow children to do what they can for themselves, but depending on age and circumstances, it may be necessary for some physical contact to take place; (e.g. a child who is hurt, who needs instruction in the use of a particular instrument/piece of equipment, safety issues such as the need to prevent a child hurting themselves, running into the road etc.).

**24.3** Section 93 of the Education and Inspections Act 2006 enables Academy staff to use 'reasonable force' to prevent a student from:

- committing any offence (or, for a student under the age of criminal responsibility, what would be an offence for an older student) ;
- causing personal injury to, or damage to the property of, any person (including the student themselves ); or
- prejudicing the maintenance of good order and discipline at the Academy or among any students receiving education at the Academy, whether during the teaching session or otherwise.

**24.4** Academy staff may also be empowered to carry out physical searches for weapons, illegal drugs, pornography etc. Actions by Academy staff must be in accordance with guidance and procedures at all times. In the event of searches or physical restraint being needed, parents will be informed the same day.

## 25. Use of Academy premises for non-Academy activities

**25.1** When Academy facilities are rented or hired out to organisations or individuals the Business Manager/Principal/Associate Principal must ensure that appropriate arrangements are in place to keep children safe.

**25.2** When services are provided under the direct management of the Academy, the Academy's safeguarding and child protection procedures apply. If this is not the case Academy must seek assurances that the body concerned has appropriate procedures in place and inspect these as needed and ensure that arrangements are in place to liaise with the Academy on relevant matters.

**25.3** Safeguarding arrangements must be included in any transfer of control agreement (such as letting or hire agreement). Failure to comply with this would lead to termination of the agreement.

## 26. Early years settings within academies

**26.1** As an early year's provider delivering the Early Years Foundation Stage (EYFS), all Brooke Weston Trust primary academies aim to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2

**26.2** All BWT Primary academies will ensure that all children in the nursery and reception classes, and/or two-year old provision, are able to learn, develop, be safe and healthy by providing;

- a safe secure learning environment;

- a member of staff who holds a current, paediatric first aid certificate is available on the premises at all times, and accompanies children on Academy trips;
- a designated key worker who liaises with parents and carers;
- routine monitoring of health and safety practices, to promote children's safety and welfare;
- Appropriate staffing, ratios and qualifications comply with statutory guidance and can meet the needs of all children;
- an environment where children can be seen and heard at all times;
- a member of staff responsible for leading on safeguarding within the early years; and

training and development for all staff so they are able to take appropriate action where there are safeguarding or child protection concern.

## 27. Elective Home Education

**27.1** The Trust believe that a child's educational needs are best met when they attend school in nearly all cases.

**27.2** The Trust understand that parents/carers have the right to home educate their children under Section 7 of the Education Act 1996.

**27.3** If an Academy is informed that a parent/carer wishes to home educate their child they will co-ordinate a meeting with parents/carers and other relevant professionals to ensure that the parent/carer is acting in the best interests of the child. This is particularly important is a child has SEND, is vulnerable and/or has a social worker.

**27.4** All academies will follow the national guidance: https://www.gov.uk/government/publications/elective-home-education.

**27.5** It is essential that the above be evidenced to demonstrate the child is safe and robust safeguarding procedures are followed.

## 28. Policy Review

**28.1** This policy will be reviewed annually or as required by legislature changes.

**28.2** In the current global pandemic, COVID-19, this policy will be continually reviewed in light of government guidance as the situation changes. Any amendments will be added as an Annex.

**APPENDIX A – Signs and symptoms of possible significant harm**

***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.***

**Indicators in the child**

**a) Bruising**

It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Bruising in or around the mouth
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Linear bruising at any site, particularly on the buttocks, back or face
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks to the upper arms, forearms or leg
- Petechae haemorrhages (pinpoint blood spots under the skin.) Commonly associated with slapping, smothering/suffocation, strangling and squeezing

**b) Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the carers being aware of the child's distress.
If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture.
There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement

Rib fractures are only caused in major trauma such as in a road traffic accident, a severe shaking injury or a direct injury such as a kick.

Skull fractures are uncommon in ordinary falls, i.e. from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over 2 to 3 hours. All fractures of the skull should be taken seriously.

**c) Mouth Injuries**

Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to the cheeks and around the mouth. Rarely, there may also be grazing on the palate.

**d) Poisoning**

Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or carer, but it may be self-harm even in young children.

**e) Fabricated or Induced Illness**

Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their carer. Possible concerns are:

- Discrepancies between reported and observed medical conditions, such as the incidence of fits

- Attendance at various hospitals, in different geographical areas
- Development of feeding / eating disorders, as a result of unpleasant feeding interactions
- The child developing abnormal attitudes to their own health
- Non organic failure to thrive - a child does not put on weight and grow and there is no underlying medical cause
- Speech, language or motor developmental delays
- Dislike of close physical contact
- Attachment disorders
- Low self esteem
- Poor quality or no relationships with peers because social interactions are restricted
- Poor attendance at Academy and under-achievement

**f) Bite Marks**

Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.

**g) Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded.

Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid.

Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation. Scalds to the buttocks of a child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

The following points are also worth remembering:

- A responsible adult checks the temperature of the bath before the child gets in.
- A child is unlikely to sit down voluntarily in a hot bath and cannot accidentally scald its bottom without also scalding his or her feet.
- A child getting into too hot water of his or her own accord will struggle to get out and there will be splash marks.

**h) Scars**

A large number of scars or scars of different sizes or ages, or on different parts of the body, or unusually shaped, may suggest abuse.

**Emotional/behavioural presentation**

- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Fear of parents being contacted and fear of returning home
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of medical help
- Aggression towards others
- Frequently absent from Academy
- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury

**Indicators in the parent**

- May have injuries themselves that suggest domestic violence
- Not seeking medical help/unexplained delay in seeking treatment
- Reluctant to give information or mention previous injuries
- Absent without good reason when their child is presented for treatment
- Disinterested or undisturbed by accident or injury
- Aggressive towards child or others
- Unauthorised attempts to administer medication
- Tries to draw the child into their own illness
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
- Parent/carer may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids
- Observed to be intensely involved with their children, never taking a much needed break nor allowing anyone else to undertake their child's care
- May appear unusually concerned about the results of investigations which may indicate physical illness in the child
- Wider parenting difficulties may (or may not) be associated with this form of abuse
- Parent/carer has convictions for violent crimes

**Indicators in the family/environment**

- Marginalised or isolated by the community
- History of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement

***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.***

**Indicators in the child**

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Child scapegoated within the family
- Frozen watchfulness, particularly in pre-Academy children

- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' - difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- Self-harm
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Chronic running away
- Compulsive stealing
- Air of detachment – 'don't care' attitude
- Social isolation – does not join in and has few friends
- Depression, withdrawal
- Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention
- Fearful, distressed, anxious
- Poor peer relationships including withdrawn or isolated behaviour

**Indicators in the parent**

- Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse
- Abnormal attachment to child e.g. overly anxious or disinterest in the child
- Scapegoats one child in the family
- Imposes inappropriate expectations on the child e.g. prevents the child's developmental exploration or learning, or normal social interaction through overprotection
- Wider parenting difficulties may (or may not) be associated with this form of abuse

**Indicators of in the family/environment**

- Lack of support from family or social network
- Marginalised or isolated by the community
- History of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement

***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.***

**Indicators in the child**

**a) Physical presentation**

- Failure to thrive or, in older children, short stature

- Underweight
- Frequent hunger
- Dirty, unkempt condition
- Inadequately clothed, clothing in a poor state of repair
- Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold
- Swollen limbs with sores that are slow to heal, usually associated with cold injury
- Abnormal voracious appetite
- Dry, sparse hair
- Recurrent / untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent head lice / scabies/ diarrhoea
- Unmanaged / untreated health / medical conditions including poor dental health
- Frequent accidents or injuries

**b) Development**

- General delay, especially speech and language delay
- Inadequate social skills and poor socialization

**c) Emotional/behavioural presentation**

- Attachment disorders
- Absence of normal social responsiveness
- Indiscriminate behaviour in relationships with adults
- Emotionally needy
- Compulsive stealing
- Constant tiredness
- Frequently absent or late at Academy
- Poor self esteem
- Destructive tendencies
- Thrives away from home environment
- Aggressive and impulsive behaviour
- Disturbed peer relationships
- Self-harming behavior

**Indicators in the parent**

- Dirty, unkempt presentation
- Inadequately clothed
- Inadequate social skills and poor socialisation
- Abnormal attachment to the child e.g. anxious
- Low self-esteem and lack of confidence
- Failure to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene
- Failure to meet the child's health and medical needs e.g. poor dental health; failure to attend or keep appointments with health visitor, GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Wider parenting difficulties, may (or may not) be associated with this form of abuse

**Indicators in the family/environment**

- History of neglect in the family
- Family marginalised or isolated by the community.
- Family has history of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Family has a past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

- Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
- Poor state of home environment e.g. unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating
- Lack of opportunities for child to play and learn

***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.***

**Indicators in the child**

a) **Physical presentation**

- Urinary infections, bleeding or soreness in the genital or anal areas
- Recurrent pain on passing urine or faeces
- Blood on underclothes
- Sexually transmitted infections
- Vaginal soreness or bleeding
- Pregnancy in a younger girl where the identity of the father is not disclosed and/or there is secrecy or vagueness about the identity of the father
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

**b) Emotional/behavioural presentation**

- Makes a disclosure.
- Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- Self-harm - eating disorders, self-mutilation and suicide attempts
- Poor self-image, self-harm, self-hatred
- Reluctant to undress for PE
- Running away from home
- Poor attention / concentration (world of their own)
- Sudden changes in Academy work habits, become truant
- Withdrawal, isolation or excessive worrying
- Inappropriate sexualised conduct
- Sexually exploited or indiscriminate choice of sexual partners
- Wetting or other regressive behaviours e.g. thumb sucking
- Draws sexually explicit pictures
- Depression

c) **Indicators in the parents**

- Comments made by the parent/carer about the child.
- Lack of sexual boundaries

- Wider parenting difficulties or vulnerabilities
- Grooming behaviour
- Parent is a sex offender

**d) Indicators in the family/environment**

- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.
- Family member is a sex offender.

**APPENDIX B – Further guidance for specific safeguarding concerns**

These definitions are an extract of those included within the Keeping Children Safe in Education document and include links where more detail can be found. These are included to ensure that staff and governors are aware of potential safeguarding risks and what signs to look out for. If in any doubt, refer all concerns or queries to the academy DSL or deputy DSL who will be able to provide advice and guidance.

**1) Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children:

- 5-11 year olds
- 12-17 year olds

These guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. Please refer to the online child arrangements information tool (Ministry of Justice) for clear and concise information on the dispute resolution service.

**2) Children Missing from Education (CME)**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their Academy's unauthorised absence and children missing from education procedures.

Knowing where children are during Academy hours is an extremely important aspect of Safeguarding. Missing Academy can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

All academies:

- monitor attendance carefully and address poor or irregular attendance without delay.
- always follow up with parents/carers when students are not at Academy.
- need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the Academy as soon as possible if the numbers change.

In response to the guidance in KCSIE (2021) all academies have:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions)
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the Local Authority when we plan to take students off-roll when they:
    - leave Academy to be electively home educated;
    - move away from the Academy's location;
    - move to another Academy as an in year admission or managed move;
    - remain medically unfit beyond compulsory Academy age;
    - are in custody for four months or more (and will not return to Academy afterwards); or
    - are permanently excluded.

Students who are expected to attend the Academy, but fail to take up the place will be referred to the Local Authority.

When a student leaves the Academy, robust records are maintained including the name of the student's new Academy and their expected start date wherever possible.

Further information
DfE statutory guidance – Children Missing Education, 2016

**3) Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

**4) Child Criminal Exploitation (CCE)**

The definition of Child Criminal Exploitation, which can be found on KCSIE (2021) page 12, is:

*"Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence."*

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

*Some of the following can be indicators of CCE:*

- *children who appear with unexplained gifts or new possessions;*
- *children who associate with other young people involved in exploitation;*
- *children who suffer from changes in emotional well-being;*
- *children who misuse drugs and alcohol;*
- *children who go missing for periods of time or regularly come home late; and*
- *children who regularly miss education or do not take part in education."*

CCE is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs grooming and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and if often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- It typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Further Information
Home Office Guidance – County Lines: criminal exploitation of children and vulnerable adults

**5) Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse.

The definition, which can be found on KCSIE (2021) page 12, is:

*"Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence."*

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE 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. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

*CCE indicators can also be indicators of CSE, as can:*
- *children who have older boyfriends or girlfriends; and*
- *children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant*."

**Further information:**

CSE is when children and young people receive something (such as food, accommodation, drugs, alcohol, cigarettes, affection, gifts, or money) as a result of performing, and/or others performing on them, sexual activities. Child sexual exploitation can occur using the internet or on mobile phones. In all cases, those exploiting the child or young person have power over them because of their age, gender, intellect, physical strength and/or resources. For victims, the pain of their ordeal and fear that they will not be believed means they are too often scared to come forward.

CSE can:
- affect any child/young person under the age of 18 years including 16-17 year olds who can legally consent to sex
- Still be abused even if the sexual activity appears consensual
- Include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- Be typified by the term of power imbalance in favour of those perpetrating the abuse.

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. CSE 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 abuse 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); and
- Sexual identity.

Indicators of CSE may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from Academy, 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;
- Associating with other young people involved in exploitation;
- Changes in eating pattern; and
- Economic vulnerability.

**Consent**
Even where a child/young person is old enough to legally consent to sexual activity, the law states consent is only valid where they make a choice and have the freedom and capacity to make that choice. If the child/young person does not have a meaningful choice, i.e. under the influence of harmful substances/fearful of outcome if not compliant, consent cannot be legally given whatever the age.

**Risks faced by children?**

- Children at risk of sexual exploitation are some of the most vulnerable in our society. Many have experienced abandonment or have suffered from physical and mental abuse. They need help but don't know where to look. The risk is deemed higher when children "go missing" or are placed in the care of the Local Authority, as well as children with Learning Disabilities.
- Perpetrators of these crimes are becoming increasingly sophisticated, using the internet to protect their identity and trafficking children around the country to avoid detection.
- Sexual violence in intimate relationships
- Abusive images and their distribution
- Immigration-related offences

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

**Additional Support**

- **NSPCC 24 Hour Child Protection Helpline - 0808 800 5000**
- www.barnados.gov.uk
- Serious organised crime strategy 2013

**6) County lines**

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including academies, further and higher educational institutions, Student Referral Units, special educational needs academies, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and Academy), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism103 should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

**7) Domestic Abuse**

As defined by the Home Office, domestic abuse is:
"Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality."

This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim." *
**This definition includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.*

**Who is at risk?**

Research shows that domestic abuse is most commonly experienced by women and perpetrated by men. Any woman can experience domestic abuse **regardless of race**, **ethnic** or **religious group**, class, disability or lifestyle. Domestic abuse can also take place in **lesbian**, **gay**, **bi-sexual and transgender** relationships, and can involve other family members, including children.

**Why does it happen?**
All forms of domestic abuse - psychological, economic, emotional and physical - come from the abuser's **desire for power and control** over other family members or intimate partners. Although every situation is unique, there are **common factors** involved.

**What are the signs of domestic abuse?**

- **Destructive criticism and verbal abuse**: shouting/mocking/accusing/name calling/verbally threatening
- **Pressure tactics**: sulking, threatening to withhold money, disconnect the telephone, take the car away, commit suicide, take the children away, report you to welfare agencies unless you comply with their demands regarding bringing up the children, lying to your friends and family about you, telling you that you have no choice in any decisions.
- **Disrespect**: persistently putting you down in front of other people, not listening or responding when you talk, interrupting your telephone calls, taking money from your purse without asking, refusing to help with childcare or housework.
- **Breaking trust**: lying to you, withholding information from you, being jealous, having other relationships, breaking promises and shared agreements.
- **Isolation:** monitoring or blocking your telephone calls, telling you where you can and cannot go, preventing you from seeing friends and relatives.
- **Harassment**: following you, checking up on you, opening your mail, repeatedly checking to see who has telephoned you, embarrassing you in public.
- **Threats**: making angry gestures, using physical size to intimidate, shouting you down, destroying your possessions, breaking things, punching walls, wielding a knife or a gun, threatening to kill or harm you and the children.
- **Sexual violence**: using force, threats or intimidation to make you perform sexual acts, having sex with you when you don't want to have sex, any degrading treatment based on your sexual orientation.
- **Physical violence**: punching, slapping, hitting, biting, pinching, kicking, pulling hair out, pushing, shoving, burning, strangling.
- **Denial**: saying the abuse doesn't happen, saying you caused the abusive behaviour, being publicly gentle and patient, crying and begging for forgiveness, saying it will never happen again.

**Is it a crime?**
Domestic abuse may comprise a number of different behaviours and consequences, so there is **no single criminal offence** of "domestic abuse". However, many forms of domestic abuse are crimes – for example, harassment, assault, criminal damage, attempted murder, rape and false imprisonment. Being assaulted, sexually abused, threatened or harassed by a partner or family member is just as much a crime as violence from a stranger, and often more dangerous.

**Not all forms of domestic abuse are illegal**, however; for example, some forms of emotional abuse are not defined as crimes. Nevertheless, these types of violence can also have a serious and lasting impact on an adult's or child's sense well-being and autonomy.

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and realises the impact of domestic abuse on children, as victims in their own right. Children can experience domestic abuse in their own home as witnesses, victims or perpetrators. Children/young people can also experience domestic abuse within their own intimate relationships.

Further Information
Home Office – Domestic Abuse: Various Information/Guidance
DfE advice – Faith-based Abuse: National Action Plan
Home Office – Relationship Abuse: disrespect nobody

**8) Homelessness**

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

**9) So-Called Honour-Based Abuse (HBA)**

So-called HBA encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

**Female Genital Mutilation (FGM)**

FGM is a collective term for all procedures involving the partial or total removal of external female genitalia for cultural or other nontherapeutic reasons. The procedure is typically performed on girls aged between infancy and 15 years, but in some cases is performed on newborn infants or on young women before marriage or pregnancy. The age at which girls undergo FGM varies according to the community. It is illegal in the UK and classed as child abuse and has no health benefits for girls or women; generally, the risks increase with increasing severity of the procedure (physical, psychological and sexual harm). It is also illegal to take a child abroad to undergo FGM.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM:

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-Academy to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from Academy or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

**FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Further information on how to report can be found at: Mandatory reporting of female genital mutilation procedural information.

Further information

Home Office – Female Genital Mutilation

Multi-agency advice – Multi-agency statutory guidance on female genital mutilation, 2016

**Forced marriage**

Forcing a person into marriage is a crime in England and Wales. 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 emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage, June 2014

Forced Marriage Unit – 020 7008 0151 / fmu@fco.gov.uk

**Breast ironing**

Breast ironing is one of five UN defined 'forgotten crimes against women'. It is a practice whereby the breasts of girls typically aged 8-16 are pounded using tools such as spatulas, grinding stones, hot stones, and hammers to delay the appearance of puberty. Breast ironing is often carried out by the girl's mother with the belief that she is:

- Protecting her daughter from sexual harassment and / or rape
- Preventing the risk of early pregnancy by "removing" signs of puberty
- Preventing her daughter from being forced into marriage, so she will have the opportunity to continue with her education

Breast ironing is a cultural custom originating in Cameroon, where up to 24% of girls are believed to have experienced it. It is also practiced in other nations such as: Ginea-Bissau, Chad, Togo, Benin, Guinea. However, there are indications that the tradition has now spread to Central and West African Diaspora living within the UK.

- Around 1,000 9–15 year old girls in the UK are currently thought to be at risk of breast ironing
- It According to a UN report, 58% of perpetrators are the victims' own mothers.

Breast ironing is often a well-kept secret between the girl and her mother. This can make it difficult for professionals to identify. Care must be taken to navigate the deep-seated cultural belief and familial sensitivity of this practice. Many girls will not disclose that they are a victim of breast ironing for fear that their mother will get into trouble; or they believe it is being done for their own good.

Some signs that a girl is at risk from breast ironing include:

- Unusual behaviour after an absence from Academy or college including depression, anxiety, aggression, becoming withdrawn
- Reluctance in undergoing medical examinations
- Some girls may ask for help, but may not be explicit about the problem due to embarrassment or fear
- Fear of changing for physical activities due to scars showing or bandages being visible

The practice of breast ironing is not explicitly covered under legislation. However, it is understood by the Government to be physical abuse.

## FGM Reporting Process Map

**Professionals should**:
- Record all decisions
- Communicate sensitively with the girl/family

Relevant professional concerned that an under 18 has had/is at risk of FGM.

Where there is a risk to life or likelihood or serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.

Informed by the girl that she has had FGM

Observes physical signs which appear to show FGM has been carried out

Suspects FGM has been carried out

Considers girl may be at risk of FGM

**Mandatory reporting duty applies**

Professional required by law to make a report to the Police (orally or in writing – **recommended route: call 101)**

**Response initiated by police, in consultation with local authority children's social care**

**Follow local safeguarding procedures** (mandatory reporting duty does not apply)

Local safeguarding procedures followed

**Response initiated by local authority children's social care**

**IMMEDIATE RESPONSE REQUIRED** re: identified victim or another child/other children

Police and social care take immediate action as appropriate

**ASSESSMENT OF CASE**: multi-agency safeguarding meeting convened in line with local safeguarding arrangements.

Attendees include:
- Police
- Children's social care
- Health

Factors considered may include:
- Measures to protect the girl/others identified as being at risk (children's social care lead)
- Possible criminal investigation (police lead)
- Health and wellbeing requirements of the girl/others, including how care delivered (health lead)

Police provide feedback on cases reported under mandatory reporting duty.

**10) Britishness**

Brooke Weston Trust is committed to ensuring that 'British' values underpin all aspects of the education and curriculum offered to its students. Britishness can be taken as 'referring to a sense of national identity of the British people.' However, it is difficult to create or devise a definition that is agreeable by all. In many respects, Britishness has a fluidity to it, given the ever-changing nature of the multi-cultural mix of people who occupy the British Isles. Therefore, the Trust strongly adheres to a view that irrespective of faith, gender, ethnicity or colour, all students are given the same equal opportunity to education. All students are given the opportunity to enhance their life chances. Every student is encouraged to become a well-rounded citizen, armed with the skills necessary to survive in an ever-changing workplace and be capable of making sound moral and ethical decisions.

The following aspects of Britishness are promoted:

- Freedom and democracy
- Tolerance of different faiths and beliefs
- Respect of law and order
- Belief in personal and social responsibility
- Respect for British institutions, including the Government and the monarchy
- The welfare state
- Mutual Respect
- Individual liberty
- An awareness and understanding of the constitution, as laid down in Magna Carta
- An understanding of Britain's global position

Please refer to the Brooke Weston Trust British Values Statement for further information.

**11) Preventing Radicalisation**

The Brooke Weston Trust has a statutory duty under Section 26 of The Counter-Terrorism and Security Act 2015 and the statutory Prevent Guidance 2015 to have due regard to the need to prevent people from being drawn into terrorism. Extremism is defined as vocal or active opposition to fundamental values of our society, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation is defined as the act or process of encouraging extremist views or actions in others, including forms of extremism leading to terrorism. There are a number of behaviours which may indicate a child is at risk of being radicalised or exposed to extremist views which could include becoming distant or showing loss of interest in friends and activities or possession of materials or symbols associated with an extremist cause.

Staff are expected to be vigilant in protecting students from the threat of radicalisation and refer any concerns to the Designated Senior Manager. Staff will receive appropriate training to ensure they have the knowledge and confidence to identify students at risk, challenge extremist ideas and know where and how to refer concerns.

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as:
   *Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.*

3. Terrorism is an action that endangers or causes serious violence to a person or people; causes serious damage to property or seriously interferes with 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.

4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. There is no single way of identifying if a child is likely to become susceptible to extremist ideology. Students may become susceptible to radicalisation through a range of social, personal and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that Academy staff are able to recognise those vulnerabilities.

6. Indicators of vulnerability include:
    - Identity Crisis – the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society;
    - Personal Crisis – the student may be experiencing family tensions; a sense of isolation; and 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'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 may have perceptions of injustice; a feeling of failure; rejection of civic life;
    - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
    - Special Educational Need – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. 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.

9. What does the Prevent guidance expect academies to do?
    a) **Assess the local risk of extremism** – Staff should assess the risk of children being drawn into terrorism. This assessment should be carried out alongside key partners of the Academy and based on the local environment. Clearly the degree of risk will differ from area to area; those Academy's in areas of high risk will be expected to do more than Academy's in areas of low risk.
    b) **Work in partnership** – Academy's should consider the approach of their Safeguarding Partnership Board/s (Northamptonshire and Cambridgeshire/Peterborough) when putting measures in place to safeguard students. Staff will need to evidence that they are working closely with the police and local Prevent co-ordinator/s by keeping appropriate records and documenting any action taken.
    c) **Staff training** – all staff should have training to ensure they understand radicalisation and extremism and what measures are available to help prevent students from becoming drawn into terrorism. Staff

should have the confidence to identify children at risk and to challenge extremist ideas and should know where and how to refer children and for further help.

d) **Internet safety** - Academies should help children stay safe online by ensuring proper filtering/security settings are in place. This could include the use of spy software which identifies key words commonly used amongst terrorist organisations. Internet safety policies should be reviewed as part of the process.

e) **Sharing information** - personal information may need to be shared to ensure a student at risk of radicalisation is given appropriate support. Information-sharing should be assessed on a case by case basis considering proportionality, consent and confidentiality and taking into account data protection legislation and any information sharing protocols.

Designated safeguarding leads and other senior leaders must be familiarised with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerns with academies.

**Further information**
The DfE has published advice for academies on the Prevent duty.
Educate Against Hate is available to support with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people.

**Channel**
This is a programme which focuses on providing support at an early state to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for academies to make referrals if they are concerned that an individual might be vulnerable to radicalisation. Guidance on Channel is available here. All members of staff and governors are required to complete the Channel awareness e-learning programme here.

**13) Peer on peer abuse**
Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to):

- abuse within intimate partner relationships
- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- gender-based violence
- sexting (also known as youth produced sexual imagery); and
- initiation-type violence and rituals.

Peer on peer abuse can also include 'upskirting'. 'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This is now a criminal offence.
Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

The Brooke Weston Trust believes that all children have a right to attend Academy and learn in a safe environment. Children should be free from harm by adults in the Academy and other students. It is recognised that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the Academy's Behaviour Policy.

Occasionally, allegations may be made against students by others in the Academy, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found:

The allegation:

- is made against an older student and refers to their behaviour towards a younger or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in the Academy
- indicates that other students may have been affected by this student
- indicates that young people outside the Academy may be affected by this student

Victims of peer on peer abuse will be supported by the Student Care team.

All concerns relating to peer on peer abuse should be reported as a safeguarding concern.

The Trust and all academies take all reports and concerns about peer on peer abuse, including child on child sexual violence and harassment, very seriously. This includes any reports or concerns that have occurred outside of the Academy or college premises, or online.

**Please also read the Peer on Peer Abuse policy on the BWT Policies webpage.**

**14) Sexual violence and sexual harassment**

Sexual violence refers to a criminal act – "assault by penetration, rape and sexual assault" as defined by the Sexual Offences Act 2003. Sexual harassment is defined as "unwanted conduct of a sexual nature".

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that academies are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

**The BWT has a zero tolerance approach to sexual violence and sexual harassment. All academies should develop a whole Academy safeguarding culture, where sexual misconduct is seen as unacceptable, not just "banter".** Groups at particular risk include girls, LGBTQ students and students with SEND, while recognising the serious implications upon all students' mental health and wellbeing.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Staff should also be aware that

- children may find it difficult to tell staff about their abuse verbally;
- in some cases there may not be a direct report;
- professional curiosity is important in noting changes in behaviour that might indicate something is wrong;
- the initial response to a report is incredibly important; and
- all reports must be taken seriously.

**Further Information**

Additional information can be found in the DfE Guidance, *Sexual violence and sexual harassment between children in academies and colleges Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads,* May 2018.

Useful links:
Department for Education – Sex and Relationship Education Guidance
www.internetmatters.org
www.nspcc.org.uk – Harmful Sexual Behaviour

**15) Up skirting**
The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

**16) Substance Abuse**
Substance abuse can simply be defined as a pattern of harmful use of any substance for mood-altering purposes. Drug abuse can be defined as "the use of illicit drugs or the abuse of prescription or over-the-counter drugs for purposes other than those for which they are indicated or in a manner or in quantities other than directed."

**17) Contextual Safeguarding**
Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, academies and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

Therefore children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.

Further Information:
https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding

**18) Serious Violence**
There are a series of indicators which may indicate that children are at risk from or involved with serious violent crime. Indicators could include: increased absence from Academy, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of these indicators and report any concerns in accordance with the procedures set out in this policy.

Further Information:
Home Office Guidance – Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance

**19) Mental Health**

The Brooke Weston Trust is aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Academy staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. These experiences can impact on their mental health, behaviour and education.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by recording this on CPOMS.

**20) Children with a Social Worker**

The Brooke Weston Trust recognise that when a child has a Social Worker, it is an indicator that the child is more at risk than most students. This may mean that they more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

These needs are taken into account when making plans to support students who have a Social Worker.

**21) Children potentially at greater risk of harm**

The Trust recognises that some children need a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage.

The DSL will hold information relating to social workers working with children at the Academy. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

DSL's also take action to promote the educational outcomes of and to protect;

- Children missing education;
- Children missing from home or care.

There are other familial issues that can have a detrimental impact on children. All academies work with other agencies in line with Keeping Children Safe in Education (2021) to support children and families in the following circumstances:

- Children facing the court procedures and/or children in the court system.
- Children with family members in prison.
- Children who are homeless.
- Children who need a social worker.

**22) Online Safety**

The Brooke Weston Trust is committed to promote the welfare and safety of our students when using digital technologies. With reference to the DfE Teaching Online Safety in Academy guidance, the Brooke Weston Trust recognises the importance of the contribution it can make to protecting and supporting students across its academies in their use of these technologies.

We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information provided to parents/carers.

All staff are made aware of the Online Safety Policy which sets our expectations relating to:

- creating a safer online environment – including training requirements, filters and monitoring;
- giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;
- inspiring safe and responsible use and behaviour;
- safe use of mobile phones both within Academy and on Academy trips/outings;
- safe use of camera equipment, including camera phones; and
- what steps to take if you have concerns and where to go for further help.

Please see the Online Safety policy for further information.

Staff must read the Online Safety Policy in conjunction with the Professional and Safe Conduct in relation to personal online behaviour.

When students use the Academy's network to access the internet, students are protected from inappropriate content by our filtering and monitoring systems. However, many students are able to access the internet using their own data plan. To minimise inappropriate use each Academy has an ICT Acceptable Use Policy. Please see this policy for details about how students will be kept safe when they are accessing 'online learning' whilst out of Academy.

Student mobile phones
*Each Academy has their own arrangements for mobile phones.*

**22) Other safeguarding issues:**

**Sexting**
In cases of 'sexting' The Brooke Weston Trust follows guidance by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'. This is often referred to as 'nudes'.

**Trafficking**
Article 3 of the Palermo Protocol To Prevent, Suppress And Punish Trafficking In Persons, Especially Women And Children, Supplementing the United Nations Convention Against Transnational Organised Crime to the UN Convention (2000) (ratified by the UK on 6 February 2006) defines trafficking as:

a) "Trafficking of persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
b) The consent of a victim of trafficking in persons to the intended exploitation set forth in sub-paragraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used;
c) The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth in subparagraph (a) of this article;
d) "Child" shall mean any person under eighteen years of age.

The Palermo Protocol establishes children as a special case. Any child transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been forced or deceived. This is partly because it is not considered possible for children to give informed consent. Even when a child understands what has happened,

they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adults. It is important that these children are protected too

Further Information
Home Office and DfE Guidance – Safeguarding children who may have been trafficked

**Fabricated Illness**
The fabrication or induction of illness in children is a relatively rare form of child abuse. Where concerns exist about fabricated or induced illness, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. The management of these cases requires a careful medical evaluation which considers a range of possible diagnoses. At all times professionals need to keep an open mind to ensure that they have not missed a vital piece of information.

Further Information
Home Office and DfE Guidance – Safeguarding Children in whom illness is fabricated or induced

**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.

A 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.

Parents and private foster carers both have 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.

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

Academies have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although academies 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 to the Academy who has parental responsibility.

Academy staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. The Academy itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the Academy steps will be taken to verify the relationship of the adults to the child who is being registered.

**Child abduction and community incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents near a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

| APPENDIX C – Main Issues within our locality | | | | |
|---|---|---|---|---|
| **Academy / Local Authority** | **Main issues identified in the area** | **How our curriculum addresses these issues** | **Training staff have received to address these issues** | **How our Academy promotes positive messaging about tackling these issues with key stakeholders** |
| Beanfield Primary Academy Northamptonshire | • Neglect<br>• Domestic Violence<br>• Parental Mental Health.<br>• Alcohol and Drug Misuse<br>• Poverty<br>• Emotional Abuse<br>• Physical Abuse | Contact with local services and professionals i.e. school nurses, NSPCC, PHSE lessons, assemblies, wellbeing week. Regular safety e-safety briefings for parents with newsletters providing details of support for families and individuals. Children have open door access to the Wellbeing Office and Rainbow Room for all of their pastoral and safeguarding needs. | Tea break Guides distributed, annual training, DSL specialist training, regular DDSL/DSL meetings, regular updates to staff on pressing issues identified, regular training for DSLs and DDSLs on current topics to enhance knowledge. | Letters home, information sharing on social media, website, and open door policy for all to talk though any issues. Class Dojo is in use promoting positive parent/staff relations. |
| Compass Primary Academy Northamptonshire | County Lines<br>Homelessness<br>Mental Health Issues<br>Poverty<br>Substance Abuse<br>• Domestic Abuse | Assembly Schedule has planned opportunities to address these. Protective Behaviours session delivered to all year groups. Rainbow Room provision to support vulnerable students. PSHE scheme of work | Statutory Safeguarding Training refresher and DSL. Explicit training for each of the issues identified. Weekly Safeguarding updates for all staff. Annual programme of training for staff. | Parents into School Website<br>Facebook page<br>Twitter<br>Weekly 'updates' via social media and parent mail (a mini newsletter more regularly). |
| Gretton Primary Academy Northamptonshire | • Online messaging, children having unrestricted access to the internet and gaming at home.<br>• Parents with mental health issues. | PSHE lessons, E Safety week, assemblies, newsletters, parent workshops, support for parents from pastoral support assistant | Safeguarding training, DSL specialist training, regular item on staff briefings. Participation in TAMHS project. | e.g. Social media, website, newsletter, parent workshops. |

| | | | | |
|---|---|---|---|---|
| Oakley Vale Primary School Northamptonshire | The main issue in the area are:<br>- Internet safety – children accessing material that is not age appropriate.<br>- Unsafe use of social media especially risk of cyber bullying and peer on peer abuse.<br>- Lack of parenting skills.<br>- Cultural expectations.<br>- Physical chastisement. | OVPs engage well with external agencies especially NSPCC and TARGET who provide support for both students and parents / teachers through their workshops and assemblies.<br>Keeping safe online is covered through the PSHE and the Computing programme of study as part of the whole school curriculum.<br>Individualised bespoke support is given to students through 1 to 1 interventions led by the trained wellbeing team and where appropriate access to a play therapist. | Designated Safeguarding leads (DSLs) receive regular refresher training to ensure safeguarding practice in up to date.<br>Staff have received training through whole school annual safeguarding training.<br>Work with TARGET –focus around of internet safety especially social media and keeping personal information safe.<br>The wellbeing team have received a range of training including Drawing and Talking and Protective Behaviours. As well as attending CAMHs and Service Six Target conferences. | We use ditto to keep our parents up to date on internet safety.<br>Governors are updated termly with a safeguarding report.<br>We meet regularly with our nominated Safeguarding Governor so that he is aware of any issues as and when they arise.<br>Our website offers links to other agencies and we use our school twitter account to keep parents and staff aware of any new developments. |
| Peckover Primary School Cambridgeshire | • Neglect<br>• Domestic violence<br>• Substance and alcohol abuse<br>• Adult mental health issues<br>• Online bullying/grooming<br>• County lines<br>• CSE | PSHE curriculum, Annual talk form NSPCC 'PANTS' agenda, regular e-safety updates and information evenings for parents, newsletters with latest information, pastoral base for children to drop in, nurture sessions to raise self-esteem and resilience, Forest schools and gardening for mental well-being | Safeguarding training, DSL specialist training, regular staff briefings, trained pastoral team, regular LA training updates for DSL's on emerging issues such as County Lines, CSE, our own designated Early Intervention family worker | Social media, website, weekly newsletters, regular information meetings for parents |

| | | | | |
|---|---|---|---|---|
| Brooke Weston Academy Northamptonshire | Child CE/ County lines/ Knife crime<br>Online Safety<br>Domestic Violence<br>Mental health<br>Drugs and alcohol<br>Peer on peer abuse | PD lessons<br>IT lessons<br>Assemblies<br>Workshops<br>Special assemblies<br>Tutor time activities<br>Working with local<br>How to be happy campaign<br>Holiday care pack<br>**agencies including:**<br>School Nurse<br>PCSO<br>Local counselling services<br>CAMHS<br>NGAGE<br>Aquarium<br>CIRV | Annual KCSIE part 1 training<br>Whole staff safeguarding training<br>DSL specialist training<br>Regular staff briefings<br>Annual NOS training<br>Prevent training<br>Regular Teams safeguarding updates<br>Tea break guides | #MindfulMonday- weekly mental health awareness tips<br>#WakeupWednesday weekly online safety tip<br>School website<br>Social media<br>Regular emails |
| Corby Business Academy Northamptonshire | County Lines,<br>Domestic Abuse<br>Drug and Alcohol misuse<br>Gang culture,<br>Sexting,<br>Grooming<br>Self-Harm<br>Online Safety | PSHE Lessons,<br>Assemblies,<br>Newsletters,<br>Workshops | Safeguarding training,<br>Protective Behaviours training, DSL specialist training,<br>regular staff briefings,<br>CPD,<br>E-bulletins,<br>Student Safeguarding Profiles<br>Whole school safeguarding RAG (HoY) | Social media, website.<br>Open evenings<br>Reception posters and leaflets<br>PCSO<br>Communication with parents<br>Meetings |
| Corby Technical School Northamptonshire | Online safety | As part of the schools' RSCS curriculum students study modules relating to this issue.<br><br>Online safety workshops are also provided to students from service 6. | All staff annual safeguarding training and completion of prevent certificate.<br>DSL Specialist Training<br>Access to National College for continued CPD for all staff. | Through the taught curriculum.<br>School work has been more widely promoted through Service 6.<br>The web-site contains useful support for parents and students.<br>National Online Safety is available free for parents to |

| | | | | |
|---|---|---|---|---|
| | | | | engage with. Details on CTS website. |
| | Drug and alcohol misuse | As part of the schools' RSCS curriculum students study modules relating to this issue.<br>Aquarius support for 1:1 mentoring for students referred by the school.<br>Northamptonshire Police Fire and Crime Commissioner workshops for students in all year groups. | Annual KCSIE training for all staff.<br>Safeguarding updates for all staff on training days to discuss recent concerns in the community and in school. | The web-site contains useful support for parents and students.<br>Counsellor from Aquarius visits CTS regularly to mentor students who require support. |
| | Child Criminal Exploitation | Year 10 students attended workshops delivered by Northamptonshire Police (local PCSO).<br>All year groups have had workshops with the Northamptonshire Police, Fire and Crime Commissioners | Annual whole staff safeguarding training in KCSIE . | PCSO delivers annual workshops to students to students starting in Yr 7.<br>Northamptonshire Police, Fire and Crime Commissioners deliver annual workshops. |
| | Knife Crime Awareness<br><br>County Lines | As part of the schools' RSCS curriculum students study modules relating to this issue.<br>During 2020-2021 all students in Years 7-13 attended workshops delivered by Northamptonshire Police (local PCSO).<br>Students from years 7-10 attended workshops by the NPFCC | All staff have been trained using KCSIE on all safeguarding matters. | School participates yearly in the Northamptonshire County Schools Challenge. During 2018-2019 the topic was knife crime. As winners' the school continues to develop the educational resource. |

| | | | | |
|---|---|---|---|---|
| Kettering Science Academy<br>North Northamptonshire | Domestic Abuse<br>Mental Health<br>Neglect<br>CSE/CCE<br>County lines and gangs<br>Knife crime<br>Peer on peer abuse<br>Online safety | PSHE lessons, assemblies<br>English lesson knife crime<br>Workshops with external agencies<br>Protective Behaviours<br>5 Ways to wellbeing<br>Nurture Dog<br>Wellbeing intervention<br>Academy Counsellor and Academy Nurse<br>Anti-bullying programme<br>Stonewall Academy<br>TAMHS | Safeguarding training, DSL specialist training, regular staff briefings and information in staff bulletin. Individual training delivered by specialists e.g. Police, NGAGE and CIRV.<br>Protective Behaviours<br>Young Carers<br>Mental Health | Social media, website, working with county initiatives such as CIRV, NCC<br>KSA Food Bank<br>Uniform Bank |
| Thomas Clarkson Academy<br>Cambridgeshire | Neglect<br>Mental Health | PSHE lessons<br>Assemblies<br>Newsletters<br>School web site<br>Pastoral specific support | Safeguarding training,<br>LA: DSL specialist training<br>Weekly staff briefing<br>Staff quick reference booklet<br>Safeguarding Staff weekly drop in clinic<br>Mental Health Lead Person at TCA | Social media, Website<br>Display Boards (Public Viewing)<br>LGB agenda item<br>Parental text message service |

**APPENDIX D – Public Health Emergency COVID-19 arrangements**

**EFFECTIVE FROM:** September 2021

**NEXT REVIEW:** As government advice is updated or September 2022, whichever is sooner. All staff will be made aware of any changes.

## 1. Context

This appendix has been added to the Brooke Weston Trust (BWT) Safeguarding and Child Protection Policy due to the global pandemic, COVID-19, which began in March 2020. This annex aims to provide all stakeholders with additional information about each Academy's safeguarding and child protection arrangements in relation to this.

The Principal of each Academy is responsible for ensuring this appendix is carried out and the Designated Safeguarding Lead (DSL) is responsible for its implementation. The responsibilities as set out in the BWT Safeguarding and Child Protection Policy also still apply.

Details about BWT safeguarding key contacts and individual contacts can be found in the main Safeguarding and Child Protection Policy and/or on each Academy's website.

## 2. Principles

BWT is committed to ensuring the safety and wellbeing of all its students. Safeguarding and child protection remains an essential part of our duty of care to all students and we have a responsibility to safeguard children and young people, whether they are on-site, at home or online.

We understand that safeguarding, child protection and promoting the welfare of all children is everyone's responsibility and everyone has a role to play in protecting children.

We recognise that academies are part of a wider safeguarding system for children and work closely with other agencies to promote the welfare of children and young people.

We continue to promote a culture of vigilance, where staff and volunteers act immediately if they have safeguarding concerns about a child. We maintain an attitude of 'it could happen here'. If anyone has a safeguarding concern about any student they should act immediately.

A DSL or deputy should be available either on site or by phone at all times during working hours.

The best interests of children must always continue to come first.

It is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children

Children and young people should continue to be protected when they are online.

The BWT recognises the impact of the pandemic on mental health and wellbeing.

The purpose of this annex is to;

- Ensure that children and young people are protected from maltreatment or harm;
- Promote safeguarding and child protection;
- Demonstrate the Trust's commitment to keeping children safe whilst operating under measures related to COVID-19;

- Provide all members of staff with the information required to meet their safeguarding duty and protect children from harm during this time; and
- Provide stakeholders with clear information relating to the Trust's safeguarding and child protection procedures during the COVID-19 outbreak.

This annex is reviewed regularly and amended as necessary to ensure that all academies are compliant with;

- all relevant legislation and statutory guidance;
- government guidance relating to the COVID-19 outbreak; and
- guidance from the Local Safeguarding Children Partnerships.

All staff will be made aware of this addendum and updated regularly on further developments.

**3. Guidance**

Each Academy continues to comply with all statutory safeguarding and child protection guidance during this time, including Keeping Children Safe in Education (September 2021).

Each Academy must operate under the most guidance provided by the DFE and/or PHE. Current guidance states:

Children and young people in England:

- are at a very low risk and rate of severe illness from current variants – the benefits of them being in an education setting continues to significantly outweigh the COVID-19 health risks
- will no longer be in bubbles or be required to self-isolate if they've been in close contact with someone who has COVID-19
- should stay at home and get a PCR test if they have any of the main COVID-19 symptoms
- are advised to take 2 rapid lateral flow tests at school (3 to 5 days apart) at the start of term, followed by twice weekly testing at home
- can get support to help them catch up or to boost their wellbeing

Each school has a DSL and a deputy DSL. All DSLs and DDSLs will keep up to date with the latest safeguarding information and guidance via e-bulletins, Local Authority e-bulletins and taking time to read and digest safeguarding developments.

**4. Procedures**

**4.1 What to do if you have a concern about a child or young person**

All staff will continue to look out for any signs that indicate a child or young person may be at risk, both on and off site, including online. Particular attention should be paid to wellbeing and mental health.

Where staff have a concern, they should continue to follow the process outlined in the BWT Safeguarding and Child Protection Policy. This includes making a report via CPOMS, which can be done remotely. In the unlikely event that a member of staff cannot access their CPOMS from home, they should email the DSL and Principal. This will ensure that the concern is received. Staff are reminded of the need to report any concern immediately and without delay.

Children are encouraged to report concerns via existing school systems, or to a trusted adult at home.

Parents/carers are encouraged to report concerns via existing school/college systems.

A trained DSL or Deputy DSL (DDSL) will be available at all times during school hours and when students are on the school premises for education purposes (e.g. Breakfast Club, after school activities etc.). Wherever possible, a

trained DSL/DDSL will be available on site. Where this is not possible due to staff self-isolation, a trained DSL/DDSL will be available to be contacted via phone or video-conferencing. In this instance an appropriate senior leader will take responsibility for safeguarding on site.

Any changes in arrangements for contacting the DSL/DDSLs will be shared with staff before 9am each day, as well as any relevant safeguarding and child protection updates and training.

If the Academy becomes aware that a child or young person is suffering, has suffered, or is at risk of suffering harm or abuse, this will be managed in line with procedures outlined in the main body of the school's safeguarding and child protection policy.

**4.2 Attendance**

In line with government guidance, all children and young people must attend school unless they are self-isolating due to testing COVID positive. The school is responsible for recording attendance, following up absence and reporting children missing education to the local authority.

Parents or carers should contact the school on the first day of absence and inform the school of the reason why the child is not in attendance. Parents should inform the school of any COVID-19 tests that have been carried out and continue to keep the school informed of reasons for absence, as appropriate.

Attendance will be coded as per the latest guidance. Further details can be found at https://www.gov.uk/government/publications/school-attendance

Academies will set work remotely for students who are absent due to COVID-19. Each school must keep a record of remote education delivered.

We understand that some parents, carers and children may be anxious about children returning to school. All schools will work closely with families who are finding the transition more challenging to ensure that children and young people are attending regularly.

All schools will work with other agencies (e.g. health and other education professionals) to support school attendance if this is required. If a student who has a Social Worker does not attend school, this information will also be shared with them.

**4.3 Supporting children who are learning at home**

In the event that children are required to stay at home (due to being COVID-19 positive or waiting for a test result), the Academy will continue to provide remote education and pastoral support. Each school has their own arrangements in place.

Anyone who has safeguarding or wellbeing concerns should contact the school and/or Multi-Agency Safeguarding Hub (MASH) as appropriate.

**4.4 Vulnerable children**

If students who are not in school due to COVID-19 are within the government definition of 'vulnerable', schools will keep in regular contact with them.

When a vulnerable student is absent, the DSL will:

- notify their social worker (if they have one);
- agree with the social worker the best way to maintain contact and offer support;
- check if a vulnerable student is able to access remote education support;
- support them to access it (as far as possible); and
- regularly check if they are accessing remote education.

The government considers children to be vulnerable if they:

- are assessed as being in need under section 17 of the Children Act 1989, including children and young people who have a child in need plan, a child protection plan or who are a looked-after child
- have an education, health and care (EHC) plan
- have been identified as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued full-time attendance, this might include:
- children and young people on the edge of receiving support from children's social care services or in the process of being referred to children's services
- adopted children or children on a special guardianship order
- those at risk of becoming NEET ('not in employment, education or training')
- those living in temporary accommodation
- those who are young carers
- those who may have difficulty engaging with remote education at home (for example due to a lack of devices or quiet space to study)
- care leavers
- others at the provider and local authority's discretion including students and students who need to attend to receive support or manage risks to their mental health

All Academies will continue to work with local services (such as health and the local authority) to ensure the services and support are in place for a smooth return to schools for students.

**4.6 Supporting children on site**

All Academies will refer to and follow advice and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID-19. Each school documents this in their Risk Assessment.

All Academies will provide wellbeing and mental health support.

All Academies will continue to work with their NHS School Nurse to support the physical and mental health needs of students.

**4.7 Children attending Alternative Provision**

Each Academy will have arrangements in place to monitor provision and attendance at any alternative provision that is used for its students.

**4.8 Safer recruitment of staff and volunteers**

The Academy continues to adhere to Keeping Children Safe in Education (September 2021) and all relevant legislation relating to safer recruitment.

The Academy will adhere to all government guidance in relation to checking identification for the purposes of obtaining Disclosure and Barring Service checks and when conducting interviews.

Where volunteers are used, the checking and risk assessment process as set out in Keeping Children Safe in Education (September 2021) will be followed. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

All Academies will continue to update the single central record and will log details of any risk assessment carried out on volunteers and any temporary staff from other educational institutions.

**4.9 Online safety and remote learning**

The Trust recognises that many students have spent increased amounts of time online during the global pandemic. All staff need to be aware of this and understand that this may have been unmoderated and unfiltered, increasing likelihood of exposure to threats and harms and subsequent wellbeing related issues. Staff should be extra vigilant to any concerns students may raise.

The Trust recognises that children both on-site and off-site are vulnerable to abuse and radicalisation online. Children who are at home because they are self-isolating may be spending more time online and this increases their vulnerability.

BWT recognise that additional safeguarding arrangements are required to ensure that children are safe online at this time. All staff will continue to look out for any signs that indicate a child may be at risk online and will report and respond to concerns in line with this policy.

Information for students and parents/carers about online safety and staying safe is available on each schools website.

All students, whether they are attending school or not, will be provided with online safety information and resources. Parents and carers should contact the school directly if they have any concerns or queries.

All academies are legally required to provide suitable remote learning for children if they are at home due to COVID-19. Academies may use technology to deliver learning to students who are at home. In order to ensure that children are safe when learning online, academies have:

- Trained staff involved on appropriate use of IT;
- Provided students and parents/carers with information;
- Reviewed the IT Acceptable Use Policy and Online Safety Policy; and
- Advised parents/carer on suitable websites and appropriate supervision

All communication with learners and parents/carers will take place using school/college provided or approved communication channels; for example, school/college provided email accounts, school website, text/email, Microsoft 365.

Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

All Academies will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in each code of conduct/behaviour policy.

When delivering remote learning, all staff will abide by BWT's IT Acceptable Use Policy and Online Safe Policy including:

- Only use online tools that have been evaluated and agreed by leadership.
- Ensure remote learning activities are planned in accordance with curriculum policies, taking learner needs and technology access into account.
- If remote learning is taking place 'live' using webcams or chat facilities, staff and learners will ensure a professional environment is maintained. This means:
    - Staff will record the length, time, date and attendance of any online lessons/contact held or made.
    - Live sessions will involve at least two members of staff where possible.
    - Sessions will not be delivered in any 1:1 situation, unless pre-approval has been given by the DSL and/or Principal and the session is auditable.
    - Staff will record any online lessons so they can be audited or accessed later if required; learners and staff should be made aware that lessons are being recorded.
    - Staff will agree online behaviour expectations with learners at the start of lessons.
    - Staff will revisit our Acceptable use of Technology Policy with learners as necessary.
    - All participants will wear suitable dress, use professional language, and ensure backgrounds of videos (live or pre-recorded) are neutral and appropriate.
    - Staff and learners should ensure personal information and/or, inappropriate or unsuitable personal items are not visible.
    - Where possible, other household members should not be in the background or in shot; if this unavoidable, they should follow appropriate language and behaviour expectations.
    - If live streaming, staff will mute and/or disable learners' videos and microphones, as required.

Learners are encouraged to report concerns to a member of staff or a trusted adult at home. Where this is not possible, additional support can be accessed online via:

- Childline – www.childline.org.uk
- UK Safer Internet Centre to report and remove harmful online content – www.reportharmfulcontent.com
- CEOP (to make a report about online abuse) – www.ceop.police.uk/safety-centre
- Internet Matters (for support for parents and carers to keep their children safe online – www.internetmatters.org
- London Grid for Learning (for support for parents and carers to keep their children safe online) – www.lgfl.net/online-safety/
- Net-aware (support for parents and carers from the NSPCC) – www.net-aware.org.uk
- Parent info (for support for parents and carers to keep their children safe online) – www.parentinfo.org
- Thinkuknow (advice from the National Crime Agency to stay safe online) – www.thinkyouknow.co.uk
- UK Safer Internet Centre (advice for parents and carers) - https://www.saferinternet.org.uk/advice-centre/parents-and-carers

Staff have received updated safeguarding training to ensure that they are equipped with the skills to keep children safe when using technology for remote learning should it be required.

Use of staff and learner personal devices, including mobile phones, will be managed in line with our existing IT Acceptable Use Policy.

### 4.10 Elective Home Education (EHE)

All staff will encourage parents to send their children to school, particularly those who are vulnerable.

Where an application for EHE is made, the Academy will consider whether a parent's decision to educate at home gives greater cause for concern compared to remaining in school. Where the DSL believes there is additional cause for concern they will consider making a referral to the local authority in line with existing procedures. This will happen as soon as the school becomes aware of a parent's intention, or decision, to home educate.

In any event the Local Authority will be informed of a parental request for EHE.

Academy' work with local authorities and, where possible, coordinate meetings with parents to seek to ensure EHE is being provided in the best interests of the child.

If a parent wants to admit their child to a school, the normal processes for in-year admissions applications will be followed.

### 4.11 Mental Health and Wellbeing

BWT recognises the potential impact of partial school closure and the national lockdown on children and young people's mental health and wellbeing. Some students may be experiencing a variety of emotions in response to the coronavirus (COVID-19) outbreak, such as anxiety, stress or low mood. This may particularly be the case for vulnerable children, including those with a social worker and young carers. It is important to contextualise these feelings as normal responses to an abnormal situation.

The wellbeing needs of children and young people must be continually reviewed to consider students who had these needs prior to lockdown and also those who may now because of it. In particular:

- All staff must be made aware of this, know how to identify the signs and what to do if they have a concern.
- Training for all staff should be provided and may include http://www.minded.org.uk/Component/Details/685525.
- Consider using pastoral and extra-curricular activities to support the rebuilding of friendships and social engagement.
- The PSHE curriculum should be reviewed to ensure children and young people are equipped with a range of strategies to self-care and signposted to age appropriate and suitable materials. These should be shared with students and their parents/carers regularly.
- Parents and carers should also be given information about how to support their children and how to seek further guidance or help.
- Pastoral/wellbeing support must be available to support students with approaches to improve their physical and mental wellbeing.

## 5. Support from Brooke Weston Trust

The BWT Safeguarding Team consists of Claire Greaves and Sarah Fleming. This team will provide support and guidance as appropriate to enable the DSL's ad DDSL's to carry out their roles effectively. This includes remotely accessing Child Protection files for the purpose of quality assurance, support, guidance and direction. The team will also provide regular group and individual support sessions. This may take the form of an online meeting. Brooke Weston Trust will use the DSL Team on Office Teams to share documents, ask/answer questions and share information.

The Trust will always ensure that safeguarding children is our priority and work within restrictions to keep children safe.

**APPENDIX E – Equality Impact Assessment**

| | |
|---|---|
| **Name of Assessment** | Safeguarding and Child Protection Policy |
| **Name of completing officer** | |
| **Date of Assessment** | 01.09.2021 |
| **Approved by** | |
| **Date of Approval** | |
| **Review Date** (if applicable) | |

The Public Sector Equality Duty places a general duty on all public bodies to have due regard to the need to achieve the objectives set out under s149 of The Equality Act 2010;

- To eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under The Equality Act.
- To advance equality of opportunity for those covered by The Equality Act
- To foster good relations

We do this by undertaking Equality Impact Assessments (EIAs) to help us consider and understand the implications of policies and decisions on people with protected characteristics. It is a way to make sure individuals and teams think carefully about the likely impact of their work on employees and take action to improve activities, where appropriate.

Part 1 should be completed to determine if a full EIA is needed. If it is determined that a full EIA is needed, then section 2 should also be completed.

Guidance on the toolkit is set out in Appendix 1

All assessments must be approved and included as an appendix to any written policy.

**Part 1 – Screening**

The following questions should be completed to determine if the full EIA is required.

- If you answer **YES** to **any** of the screening questions, complete Part 2 Equality Impact Assessment
- If you answer **NO** to **any** of the screening questions, provide supporting evidence that explains your answer
- If you answer **NO** to **all of** the questions, include the following statement within the policy "This policy / project was screened for impact on equalities on [insert date]. The following evidence [Evidence] has been considered. No full equality impact assessment is required."

| Question | Yes/No | Include any explanation required |
|---|---|---|
| 1. Does the policy affect employees or service users? *(A potential to affect a small number of people in a significant way is as important as a potential to affect many people)* | Yes | The policy applies to all staff and students. |
| 2. Are there any aspects of the policy that could contribute to equality or inequality? | Yes | The policy outlines roles and responsibilities and processes for ensuring children and young people are safe and protected from harm (physical and/or mental) |
| 3. Does it relate to an area where there are known inequalities? *(for example, disabled people's access to public transport, the gender pay gap, racist or homophobic bullying in schools, educational attainment of Gypsies and Travellers, etc).* | Yes | Yes<br>Outcomes for students with special educational needs and/or disabilities. |
| 4. If this is an amendment of an existing policy, was the original policy impact assessed? | Yes, Yes | This is an amendment due to statutory changes (Keeping Children Safe in Education September 2021). |
| **Is an Equality Impact Assessment needed?** | Yes | |

**Part 2 – Equality Impact Assessment**

| Summary of aims and objectives of the policy / activity / event etc being assessed |
|---|
| *Set out what provision is currently in place and who the current stakeholders are.*<br>*What is the proposal to be considered, or what changes are being made to the current provision/policy/activity?*<br><br>The Brooke Weston Trust commits to providing an environment which safeguards and promotes the welfare, safety, health and guidance of our students. The Brooke Weston Trust recognises the importance of the contribution it can make to protecting and supporting students across its academies.<br><br>The policy covers legal duties as set out in Keeping Children Safe in Education (KCSIE) (September 2021) and Working Together to Safeguard Children (February 2019) and the processes and responsibilities to implement them.<br><br>Stakeholders are staff, students, parents/carers, local authority, external agencies, Local Governing Body and BWT governance. |

| What involvement and consultation has been done in relation to this policy / activity / event etc? |
|---|
| *Any relevant groups that this has been discussed or consulted with.*<br><br>None – statutory policy. |

| Who is affected by this policy / activity / event etc? What evidence is there to show the impact? |
|---|
| *Any relevant groups/ individuals that may be affected by this change / new policy etc*<br>• Students who are vulnerable and/or at risk of significant harm to their physical and mental health are positively affected as they will benefit from processes and resources in place so their needs are met within the resources that each academy has.<br>• Parents and carers<br>• Staff need to be aware of and implement the policy |

| Tick the relevant box for each line | Based on the above information, what impact will this proposal have on the following groups? *see appendix 2 for more details on how each group may be affected, and appendix 3 for possible impacts | | |
|---|---|---|---|
| | Positive / Negative / Neutral | Please explain and give examples of any evidence/data used | Action to address negative impact (e.g. adjustment to the policy) |
| **Sex** | **Neutral** | | |
| **Gender Reassignment** | **Positive** | ➢ Early help for mental health and/or emotional wellbeing. | |
| **Age** | **Positive** | ➢ Safe environments.<br>➢ Raised awareness of safeguarding issues.<br>➢ Clear procedures in place.<br>➢ Improved information sharing.<br>➢ Improved record keeping.<br>➢ Voice of the child heard. | ➢ Acknowledgement that safeguarding has particular impact for children and young people.<br>➢ Staff becoming over sensitive – training and support. |
| **Disability** | **Positive** | ➢ Safe environments.<br>➢ Raised awareness of safeguarding issues.<br>➢ Clear procedures in place.<br>➢ Improved information sharing.<br>➢ Improved record keeping.<br>➢ Voice of the child heard.<br>➢ Early help. | |
| **Race & Ethnicity** | **Positive** | ➢ Safe environments.<br>➢ Raised awareness of safeguarding issues.<br>➢ Clear procedures in place.<br>➢ Improved information sharing.<br>➢ Improved record keeping.<br>➢ Voice of the child heard.<br>➢ Early help. | ➢ Stereotyping (e.g. FGM, HBA, extremist views) - training |
| **Sexual Orientation** | **Positive** | ➢ Early help for mental health and/or emotional wellbeing. | |
| **Religion or Belief (or No Belief)** | **Positive** | ➢ Safe environments.<br>➢ Raised awareness of safeguarding issues.<br>➢ Clear procedures in place.<br>➢ Improved information sharing.<br>➢ Improved record keeping.<br>➢ Voice of the child heard.<br>➢ Early help. | ➢ Stereotyping (e.g. terrorism, extremist views)- training |
| **Pregnancy & Maternity** | **Positive** | ➢ If under age then protective measures will be in place. | |
| **Other Groups: socio-economic exclusion** | **Positive** | ➢ Raised awareness of safeguarding issues.<br>➢ Clear procedures in place.<br>➢ Improved information sharing.<br>➢ Improved record keeping.<br>➢ Voice of the child heard. | |

| | | | |
|---|---|---|---|
| | | ➢ Children's needs are met.<br>➢ Early help | |

**Evaluation:**

| Question | Explanation / Justification | |
|---|---|---|
| Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people? | No – this policy outlines how schools meet their statutory duties in relation to safeguarding and child protection.<br>The policy fully adheres to the guidance as outlined by Keeping Children Safe in Education (KCSIE) (September 2021) and Working Together to Safeguard Children (February 2019). | |
| **Final Decision:** | **Tick the relevant box** | **Include any explanation / justification required** |
| 5. No barriers identified, therefore activity will **proceed.** | Yes | |
| 6. You can decide to **stop** the policy or practice at some point because the data shows bias towards one or more groups | | |
| 7. You can **adapt** or **change** the policy in a way which you think will eliminate the bias | | |
| 8. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore, you are going to **proceed with caution** with this policy or practice knowing that it may favour some people less than others, providing justification for this decision | | |