

## SAFEGUARDING & CHILD PROTECTION POLICY

<b>Policy Code</b> QSC/24	<b>Authorisation Date</b> September 2023	<b>Next Review Date</b> September 2024
<b>Enquiries Contact:</b> support@uk.oneschoolglobal.com	<b>Approval Authority</b> OSG UK Board	<b>Policy Author</b> Kimberley Hutton
<b>Associated Documents</b> <ul style="list-style-type: none"> <li>• <i>Anti-Bullying Policy</i></li> <li>• <i>Attendance and Children Absent from or Missing in Education Policy</i></li> <li>• <i>Behaviour Management Policy</i></li> <li>• <i>ICT and E-Safety Policy</i></li> <li>• <i>Complaints Policy</i></li> <li>• <i>Curriculum Policy documents and schemes of work for PSHE</i></li> <li>• <i>Data Protection Policy</i></li> <li>• <i>Disciplinary Procedure</i></li> <li>• <i>Health &amp; Safety Policy including the following procedures:</i></li> <li>• <i>Educational Visits</i></li> <li>• <i>First Aid including arrangements for meeting the medical needs of children</i></li> <li>• <i>Induction of new staff and volunteers</i></li> <li>• <i>Learning Support (SEND) Policy</i></li> <li>• <i>Mental Health and Wellbeing Policy</i></li> <li>• <i>(The) Prevent Duty Guidance</i></li> <li>• <i>RSHE Policy</i></li> <li>• <i>Safer Recruitment Policy</i></li> <li>• <i>Security &amp; Visitors Policy</i></li> <li>• <i>Staff Code of Conduct</i></li> <li>• <i>Whistle Blowing Policy</i></li> </ul>		

### 1. PURPOSE

At OSGUK Newtown Campus (hereafter 'the Campus'), we will provide a safe and welcoming environment where every child and young person is respected and valued. It is the responsibility of everyone to be alert to the signs of abuse and harm in all its forms and to follow the procedures to ensure that children receive timely and effective support, protection and justice.

This Policy sets out the Campus' commitment to safeguarding, promoting the welfare of children and Keeping Children Safe in Education in line with the September 2023 Statutory Framework.

The purpose of this policy is to provide a framework for how we safeguard and promote students' welfare in accordance with our moral duty and statutory guidance. The policy also informs parents and carers about how we will safeguard their children while they are in our care.

The school always considers 'the best interests of the child'

## 2. SCOPE

This policy and the associated statutory procedures apply to all staff, Board of Trustees of the proprietor, local governance CA team, volunteers, visitors and parents of both current and prospective students in the Campus.

The policy and procedures are consistent with the locally agreed inter-agency procedure for Powys Local Safeguarding partners.

The policy is available on the school website and is made available to all staff, Board of Trustees of the proprietor, Local Governance CA team, volunteers, parents, both current and prospective, and visitors to the school.

## 3. DEFINITIONS

Term	Definition
CCTV	Close circuit television
Child	Anyone who has not yet reached their 18th birthday. For the purpose of the policy this means all students in the Campus and also extends to visiting students from another OSGUK Campus
Child Protection	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm
Child Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. KCSIE defines four categories of abuse: emotional, physical, sexual and neglect
Child in Need	A child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled
CPOMS	Child Protection On-line Management System
DfE	Department for Education
DBS	Disclosure and Barring Service
LADO	Local Authority Designated Officer – officers from the local authority designated as being the primary point of liaison in the event of allegations of abuse being made against the Campus Principal, proprietor or member of governing body and staff.
DOFA	Designated Officer for Allegations - officers from the local authority designated as being the primary point of liaison in the event of allegations of abuse being made against the Campus Principal, proprietor or member of governing body and staff
Looked After Child	A child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority.
DSL	Designated Safeguarding Lead – member of staff in school who leads on Safeguarding and Child Protection – both staff training and management of referrals. The DSL must be a Senior Leader
FGM	Female Genital Mutilation
GDPR	General Data Protection Regulations
HSB	Harmful Sexual Behaviours
IT	Information Technology
KCSIE	Keeping Children Safe in Education

LA	Local Authority
LSP	Local Safeguarding Partner
MASH	Multi Agency Safeguarding Hub. Often the first point of referral from school for a Child Protection case
NLT	National Leadership Team
NSPCC	National Society for the Protection of Cruelty to Children
OSGUK	OneSchool Global UK
Parent	Refers to birth parents and other adults in a parenting role
PEP	Personal Education Plan
CoC	Child on Child
Principle of Proportionality	The least intrusive response appropriate to the risk presented
PSHEE	Personal, Social, Health and Economic Education
RTL	Regional Team Leader
Safeguarding	The process of protecting children from maltreatment, preventing the impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. This includes all forms of maltreatment including Youth Produced Sexual Imagery, Child on Child abuse, cyber bullying and radicalisation
SCR	Single Central Record
SEND	Special Education Needs and Disabilities
SIMS	School Information Management System
Social Care	Refers to Children's Services in the area in which the child is resident.
Staff	Refers to all those working for or on behalf of the Campus, full time or part time, temporary or permanent, in either a paid or a voluntary capacity
TRA	Teaching Regulations Authority
UKCCIS	UK Council for Child Internet Safety
WTSC	'Working Together to Safeguard Children'

## CONTACT DETAILS

SCHOOL CONTACT INFORMATION		
Designated Safeguarding Lead:		
Rebecca Midwinter	01686 670152	<a href="mailto:rebecca.midwinter@uk.oneschoolglobal.com">rebecca.midwinter@uk.oneschoolglobal.com</a>
Role on the Senior Leadership Team	Senior Teacher	
Deputy Designated Safeguarding Lead:		
Verna Nupen	01686 670152	Verna.nupen@uk.oneschoolglobal.com
Other role in school	LSCO & Deputy DSL	
Designated Senior Mental Health Lead		
Verna Nupen	01686 670152	Verna.nupen@uk.oneschoolglobal.com
Other role in school	LSCO & Deputy DSL	
Campus Principal (where the concern is about a member of staff):		
Rebecca Midwinter	01686 670152	<a href="mailto:rebecca.midwinter@uk.oneschoolglobal.com">rebecca.midwinter@uk.oneschoolglobal.com</a>
Regional Team Leader (where the concern is about the Campus Principal):		
Ben Woodcock	07837174397	<a href="mailto:ben.woodcock@uk.oneschoolglobal.com">ben.woodcock@uk.oneschoolglobal.com</a>

<b>Safeguarding CA (Governance)</b>		
Chris Penprase	07848452944	<a href="mailto:chris.penprase@uk.oneschoolglobal.com">chris.penprase@uk.oneschoolglobal.com</a>
<b>Regional Lead for Safeguarding:</b>		
Kimberley Hutton	0330 055 5600	<a href="mailto:kimberley.hutton@uk.oneschoolglobal.com">kimberley.hutton@uk.oneschoolglobal.com</a>
<b>EXTERNAL CONTACT INFORMATION</b>		
<b>Campus Local Safeguarding Partner (LSP)</b>		
Assist Powys	0345 602 7050	<a href="mailto:assist@powys.gov.uk">assist@powys.gov.uk</a>
<b>Multi-Agency Safeguarding Hub (MASH) for initial enquiries about children and young people</b>		
Mid & West Wales Safeguarding Board	01597 827666	<a href="mailto:csfrontdoor@powys.gov.uk">csfrontdoor@powys.gov.uk</a>
<b>Local Authority Designated Officer (LADO) for allegations against individuals who work with children, including supply staff</b>		
Michael Gedrim	01597 826431	<a href="mailto:Michael.gedrim@powys.peoples.gov.uk">Michael.gedrim@powys.peoples.gov.uk</a>
<b>FGM The Diversity Crime Unit</b>	999/101	Online crime reporting service
<b>LA Prevent Lead</b>	08000 113764	<a href="https://www.gov.uk/report-terrorism">https://www.gov.uk/report-terrorism</a>
<b>Police (non-emergency)</b>	101	<a href="https://www.police.uk/pu/contact-us">https://www.police.uk/pu/contact-us</a>
<b>Ofsted Safeguarding Children</b>	08456 404046	<a href="mailto:whistleblowing@ofsted.gov.uk">whistleblowing@ofsted.gov.uk</a>
<b>DfE Dedicated telephone helpline and mailbox for non-emergency advice for Staff &amp; Trustees</b>	020 7340 7264	<a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>
<b>NSPCC Whistleblowing Helpline</b>	0800 028 0285	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>CEOP National Crime Agency</b>	0370 496 7622	<a href="mailto:communication@nca.x.gsi.gov.uk">communication@nca.x.gsi.gov.uk</a>

## 4. POLICY STATEMENT

### 4.1 INTRODUCTION

- 4.1.1 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2018, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if you are worried a child is being abused' 2015, Prevent Duty Guidance 2023.
- 4.1.2 The policy also reflects, both statutory guidance KCSIE 2023 and LSP Procedures.
- 4.1.3 The Board of Trustees takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our

Campus to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

- 4.1.4 COVID 19: Post pandemic, in the event of lockdowns and remote learning, the DSL and DDSL cover will remain the same. Any alterations to contact details will be shared with parents via newsletter and the website.

## 4.2 POLICY PRINCIPLES

- 4.2.1 The welfare and needs of the child are paramount.
- 4.2.2 At the Campus we maintain an attitude of 'It could happen here'.
- 4.2.3 Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- 4.2.4 All children have a right to be protected from harm and abuse.
- 4.2.5 Our organisational culture will be one of **highly consistent and collective vigilance** for the safety and wellbeing of the children in our care, for every child every day.
- 4.2.6 All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the Campus or in the community, taking into account extra familial harms (previously termed contextual safeguarding), which are incidents and/or behaviours associated with factors outside the Campus and/or occur between children outside of these environments in accordance with statutory guidance.**
- 4.2.7 Anyone can make a referral to children's services if this is believed to be in the child's best interests and or the child is at risk of significant harm.**
- 4.2.8 We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- 4.2.9 Whilst the Campus will work openly with parents as far as possible, it reserves the right to contact Social Care or the Police, without notifying parents, if this is believed to be in the child's best interests and/or the child is at risk of significant harm.

## 4.3 POLICY AIMS

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

As part of our Safeguarding Policy the Campus will:

- 4.3.1 Demonstrate the Campus' commitment with regard to safeguarding and child protection to students, parents and other external partners
- 4.3.2 Promote and prioritise the safety and wellbeing of children and young people
- 4.3.3 Promote a culture of listening to 'the child' and act in their best interest
  - At the Campus pupils will have the following opportunities to be listened to
  - **NEWTOWN CAMPUS OPPORTUNITIES**

At our campus, we conduct pupil voice as part of our assurance processed twice a year. We gather student wellbeing feedback weekly through our GFI – good feel indicator survey and we conduct a listening to learners initiative annually. We also have a worry box situated in the primary school. As well as this we have a student wellbeing team who liaise with students on wellbeing.

We have a playground buddy system in the primary school to help those who may be struggling with wellbeing.

- 4.3.4 Provide a safe environment for all children especially those who are considered vulnerable
- 4.3.5 Ensure robust safeguarding arrangements and procedures are in operation
- 4.3.6 Enable the Campus to effectively contribute to Early Help assessments of need and provide support for those children
- 4.3.7 Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people. (Including extra-familial harm)
- 4.3.8 Ensure that all staff understand the policy and procedures to deal with Child-on-Child abuse
- 4.3.9 Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- 4.3.10 Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- 4.3.11 Prevent the employment/deployment of unsuitable individuals

#### **4.4 WHOLE SCHOOL APPROACH TO SAFEGUARDING**

- 4.4.1 We adopt a whole school approach to safeguarding with safeguarding and child protection at the forefront and underpinning all relevant aspects of process and policy development at the Campus
- 4.4.2 Where there is a safeguarding concern, staff should take children's wishes and feelings into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously, and they can safely express their views

#### **4.5 TYPES OF ABUSE**

- 4.5.1 Abuse may fall into the categories of physical, emotional (including regular exposure to domestic violence), sexual and neglect. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They must seek to understand the background and context to make good safeguarding decisions
- 4.5.2 The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) that are deemed to apply in the UK. At OSGUK we will protect and respect an individual's human rights when making decisions about them.

#### 4.5.3 Abuse:

- A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Abuse is often categorized into four broad categories:

##### **Physical**

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

##### **Emotional** (including regular exposure to domestic violence)

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



**Sexual**

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

**Neglect**

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

Further examples of abuse which fit into these four categories of abuse are set out in appendix 1

**4.6 HUMAN RIGHTS ACT**

**4.6.1** under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, 25 and
- Protocol 1, Article 2: protects the right to education.

**4.7 EQUALITY ACT**

**4.7.1** The Campus must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).



**4.7.2** Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on the Campus in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

**4.7.3** Provisions within the Equality Act allow the campus to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. The Campus should, for example, take positive action to support girls if there was evidence they were being subjected to unwanted behaviours, sexual violence or sexual harassment

#### **4.8 RECOGNISING SIGNS OF ABUSE**

**4.8.1** Possible signs of abuse include the following (but are not limited to these and these signs do not necessarily mean that abuse is occurring):

- the student says that they have been abused or asks a question which gives rise to that inference
- there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour. For example, they may become aggressive, challenging, disruptive or withdrawn
- the student does not want to change clothes in front of others or participate in physical activities
- the student is having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- the student talks about being left home alone, with carers that appear to be inappropriate or with strangers
- the student is regularly missing from school or education
- the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- the student's development is delayed in terms of emotional progress
- the student suddenly loses or gains weight
- the student drinks alcohol regularly from an early age
- the student is concerned for younger siblings without explaining why
- the student talks about running away
- the student shies away from being touched or flinches at sudden movements

- the student demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes
- the student appears neglected, e.g. dirty, hungry or inadequately clothed
- the student is reluctant to go home or has been openly rejected by his parents or carers.

#### **4.8.2 Signs of grooming:**

4.8.3 The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include:

- meeting students secretly, or without seeking authorisation from the Head Teacher
- collusive behaviours designed to cultivate dependency, such as
  - unprofessional conversations about other members of staff
  - breaking School Rules over providing students with alcohol and
  - 'friending' pupils on social media platforms, contrary to school policy

4.8.4 Students who are being groomed at school or elsewhere may:

- be very secretive, including about what they are doing online
- have unexplained absences
- have older pupil friends or girlfriends
- go to unusual places to meet friends
- have new belongings such as clothes or mobile phones that they can't or won't explain
- have access to drugs and alcohol

4.8.5 In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed

4.8.6 You may find it useful to refer to the Department for Education's guidance What to do if you're worried a child is being abused (March 2015)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

4.8.7 Further information is available in Appendix 1 (Further Information on Signs of Abuse)

## **4.9 ROLES & RESPONSIBILITIES**

### **4.9.1 The Board of Trustees (The proprietor):**

- Are ultimately responsible as the proprietor to ensure policy, practice and training is in place, and that staff understand and discharge their role and responsibilities in line with KCSIE 2023 - Part 2 - The Management of Safeguarding
- Governing bodies and proprietors will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in

- place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated
- will ensure that staff will undergo regular updated safeguarding training, including online safety that is aligned and integral to the whole school Continuing Professional Development (CPD) programme. Whilst considering the training requirements the board will have regard to the Teacher Standards, which set out the expectations that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils
  - will ensure that children are taught about safeguarding, including online safety
  - will appoint a member of the National leadership team with governance oversight of safeguarding nationally, a professional lead for safeguarding nationally and a safeguarding CA to oversee local safeguarding governance at each campus
  - The National Leadership Team member responsible for Governance of Safeguarding on behalf of the board is: Andrew Cuckson Contact: [Andrew.cuckson@uk.oneschoolglobal.com](mailto:Andrew.cuckson@uk.oneschoolglobal.com)
  - The Regional Principal responsible for Safeguarding is: Kimberley Hutton Contact: [Kimberley.hutton@uk.oneschoolglobal.com](mailto:Kimberley.hutton@uk.oneschoolglobal.com)
  - Safeguard and promote the welfare of children to protect them from maltreatment, to prevent impairment of children's health or development ensuring that children grow in circumstances consistent with the provision of safe and effective care and taking action to enable children to have the best outcomes
  - Ensure that there is a mechanism in place to assist all staff, including CAs and volunteers understand and discharge their role and responsibilities to safeguarding in line with the KCSIE (Part 1) 2023
  - Delegate to the Regional Team Leader the responsibility to ensure that all CA's, the District Principals, Campus Principal(s), members of the Senior Leadership Team and middle leaders will be subject to s128 management checks. If someone is not eligible for a children's barred list check but will be working in a management position in an independent school, a section 128 check should be carried out using the Teaching Regulation Agency's (TRA) employer access service. In addition, the Regional Team Leader is responsible to ensure that safeguarding is a standing agenda item at all CA team meetings and the School Improvement Plan (SIP) includes a section on safeguarding
  - Under the equality act 2010 the trust will ensure that the campus will not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity or sexual orientation (Protected Characteristics)

#### **4.9.2 The Regional Executive Committee will:**

- Appoint a Safeguarding CA (Member of local governing body) to:
  - take a lead in monitoring that the statutory requirements and procedures set out in this policy are adhered to
  - Take lead governance responsibility on ensuring the campus has appropriate monitoring and filtering systems in place on all IT devices in the campus
  - Be responsible for undertaking annual reviews on behalf of the National Board of Trustees and evaluation at the Campus of the Safeguarding & Child Protection Policy and procedures in conjunction with the Designated Safeguarding Lead and Campus Principal. Provide an annual report to the National Board of Trustees on the safeguarding provision
  - Meet termly at the Campus Impact Meeting (full governance) alongside to review and evaluate Safeguarding and child protection policies and procedures
  - Be trained in child protection and inter-agency working. This training will be updated every two years or in line with the LSP requirements.
  - Attend the half termly Campus Safeguarding Committee
  - Ensure all visitors are vetted and checked prior to working in any way with students and records are kept to show the record of the checks completed
- Ensure that a comprehensive annual safeguarding audit is undertaken and that all action points are recorded on the School Improvement Plan and remedied. Ensure that the safeguarding half termly reports are completed, their outcomes discussed, and any learning actioned on the School Improvement Plan
- Ensure that safeguarding arrangements take into account policies and procedures of the LSP
- Have procedures in place to handle allegations against other children (Child on Child); nudes and semi-nudes and how to handle allegations about staff members, including allegations against the Campus principal and CAs, volunteers or visitors to the school
- Ensure the Campus' Safeguarding and Child Protection Policy is available publicly and on the Campus website
- Ensure that the DSL and DDSL have time, funding, training, support and resources to undertake their role and to support other staff within the Campus
- Ensure that appropriate child protection training is in place (current and up-to-date) for the DSL and DDSL to a standard set by the LSP and is recorded on the Training Log. If appropriate, ensure that the DSL receives training to promote the educational achievement of children who are looked after
- Ensure that new staff members taking on a DSL and DDSL role are appropriately trained by the LSP
- Ensure that appropriate child protection training is in place as part of the induction for all staff including temporary and voluntary staff and that it is updated annually or in line with the LSP requirements and that there is no lapse in training dates.

Safeguarding training must always include an element of face to face, interactive training

- Liaise with the LA on child protection allegations against staff, including the Campus Principal, DSL or supply staff
- Be aware of and follow the Campus's local arrangements with respect to their three safeguarding partners' (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area arrangements

#### **4.9.3 Regional Safeguarding Committee will:**

- Ensure that Safeguarding has the appropriate importance and organisational priority.
- Ensure that OSGUK and all Campuses comply with their safeguarding obligations as set out in relevant legislation, regulations and guidance and any rules issued by OSGUK.
- Review national trends in safeguarding and child protection, in order to advise on improvements to policy and procedure for all Campuses; make recommendations on safeguarding strategy, policies and practice, including lessons learnt from ineffective practice, in order to ensure that OSGUK and Campus' fulfilment with their safeguarding obligations.
- Identify and assess the safeguarding risks faced by OSGUK and Campuses and to recommend measures to mitigate those risks including the maintenance of a safeguarding risk register.
- Hold line management (Regional Principals, Campus Principals and DSLs) to account on implementation of safeguarding policies in schools.
- Identify and reflect on issues and patterns of concerns which may require a revision of safeguarding policies or practice.
- Ensure that every campus receives a focussed safeguarding visit annually. The Regional Safeguarding Committee will analyse results of the committee to inform the strategic plan for OSGUK

#### **4.9.4 Regional Safeguarding Coordinator will:**

- Provide guidance to all Campuses on policy and procedures related to Safeguarding
- Provide advice and guidance to Campus Principals and Safeguarding governance members in the implementation of the Safeguarding Policy, procedures and for training of staff, parents, volunteers and students

#### **4.9.5 Regional Principal and Regional Safeguarding Lead will:**

- Be DSL trained with their LSP every two years
- Be Safer Recruitment Trained every two years

- Regularly audit safeguarding procedures across campuses and make recommendations, where necessary, for improvement or sharing of good practice and to report on its effectiveness to the Board of Trustees
- Be aware of Safeguarding referrals having been made, including allegations against staff members. Specific details of referrals relating to children do not need to be shared. Will support and provide supervision where needed for DSL's and CP's.
- Provide professional support in the event of disciplinary procedures against students or adults at the Campus.
- Not be expected, unless acting as Campus Principal, to advise on specific referrals to the LADO, Children's Social Care or Police as this would delay the process and conflict with this policy

#### **4.9.6 HR CA (Governor) will:**

- Ensure that the statutory responsibilities for safer recruitment are followed, preventing people who pose a risk of harm from working with children.
- Ensure that the Safer Recruitment Policy is kept up to date and properly implemented
- Ensure safer recruitment procedures are followed before a new member of staff starts work at the campus, including pre-employment checks and vetting of new staff and volunteers working with children and records kept in line with KCSIE and the supplementary guidance on disqualification requirements
- Ensure that at least one person on a recruitment panel has undertaken safer recruitment training within the last two years
- Ensure that all appropriate child protection checks and procedures are applied to staff employed by another organisation such as agency staff working with the Campus' students, and that they are carried out
- Ensure that no barred person is allowed to work in any regulated activity
- Have procedures to fulfil the legal duty to make a referral to the DBS, The Secretary of State via the TRA and, if appropriate, the charity commission in the event of dismissal of staff on safeguarding grounds

#### **4.9.7 The Campus and District Principal will:**

- Ensure that the Safeguarding Policy and its procedures are implemented and followed by all staff
- Ensure the Campus is compliant with all Safer Recruitment statutory legislation as well as the OSGUK Safer Recruitment policy
- Ensure that the DSL and DDSL have the authority, responsibility, time and resources to carry out their roles in line with the guidance in KSCIE
- Ensure that they meet regularly with the DSL to hold them to account and ensure they are meeting their statutory obligations as a DSL as defined in KSCIE
- Undertake the LSP DSL Training every two years
- Undergo PREVENT training every two years

- Ensure that safeguarding, including helping to protect students from a range of risks, including e-safety, is fully explored in teaching and learning opportunities within the curriculum
- Will take lead responsibility to ensure the Campus has appropriate measures in place for monitoring and filtering of all IT devices in school.
- Ensure that students are able to identify a trusted adult to listen to their concerns
- Ensure that there is a Safeguarding Notice Board in the Staff Room demonstrating how the Campus keeps children safe, to include e-safety. It will include how to report a concern, training dates, policies, posters, roles and responsibilities of safeguarding personnel, safeguarding up-dates, KCSIE and other publications and communications with regard to safeguarding
- Ensure Safeguarding Notices are displayed around the school, at reception and in all communal areas
- Ensure all visitors are presented with an OSG visitor booklet which details the Safeguarding personnel and processes for the Campus
- Ensure all visitors receive a Safeguarding briefing upon visiting the school
- Ensure all visitors are vetted and checked prior to working in any way with students and records are kept to show the record of the checks completed
- Meet with the DSL to be kept informed of on-going investigations
- Be the appointed member of staff to promote the achievement of looked after children
- Be alert to children who go missing and put in place the appropriate safeguarding response
- Ensure that any near misses are correctly investigated and recorded, all near misses must be reported to the RP, LCA and RTL. A full lesson learned review should be held and documented to allow the national leadership team / governance to challenge steps taken and next steps identified.
- In line with the equality act, the Campus Principal will carefully consider and ensure that they are promoting the welfare and supporting their students with regard to particular protected characteristics, including disability, sex, sexual orientation, gender reassignment and race.

#### **4.9.8 Campus Senior Leaders will;**

- In addition to the expectations of staff, Senior Leaders are expected to read, understand and adhere to the full KCSIE 2023 guidance

#### **4.9.9 Designated Safeguarding Lead**

- The role for the DSL is set out in detail in Annex C of KCSIE and is an appendix to job description of the individual concerned
- The DSL will be given the authority, responsibility, time and resources to carry out the role

This can be seen in Appendix 4 of this policy. In summary this includes responsibilities to:



- Take lead responsibility for safeguarding and child protection (including online safety) whether in school or at home
- Manage referrals to other services
- Work with others both within the Campus and external services. It is especially important that the DSL is aware of and follows the Campus's local arrangements with respect to their three safeguarding partner arrangements. Please note, local authorities should share with the DSL that a child has a social worker; there are clear powers to share this information under existing duties.
- Undergo training to provide them with the knowledge and skills required to carry out the role. Training should provide the DSL with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care. This training should be updated at least every two years
- Be trained in child protection and inter-agency working. This training will be updated every two years or in line with the LSP requirements.
- Be trained in PREVENT awareness and CHANEL every two years
- Be involved in local networking events with the Local authority to undergo informal updates
- Raise awareness of child protection procedures within the Campus
- Ensure that when a child leaves a Campus and they have a Child Protection File that it is transferred to the new school, separately from the main student file, ensuring secure transit and confirmation of receipt within 5 days of them starting at the new school.
- Ensure that either the DSL or DDSL are available at all times during school hours

**4.9.10 In addition to the Job Description the DSL will:**

- Be a senior member of the Campus staff on the leadership team. The campus principal should not be the lead DSL but may perform a deputy role
- Be contactable and available between the hours of 8am and 4pm during term time
- Be trained in institutional grooming and E-Safety; ensure knowledge and skills are kept up-to-date
- Take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- Organise training on child protection, E-Safety and Prevent within Campus for all staff, volunteers and governance members ensuring that it is current and up-to-date and is recorded on the Training Log
- Organise relevant training for all staff, volunteers and governance members to ensure they are kept up to date and able to effectively safeguard students.
- Ensure staff are kept up to date on trends in relation to context of campus and local area

- Ensure that all staff retain clear and well-organised written records of all concerns, discussions and decisions and the reason for those decisions using CPOMS
- Oversee recording and reporting accordingly and monitoring regularly using CPOMS
- Review records regularly so that concerning patterns of behaviour can be identified.
- Ensure the safeguarding local arrangements form is up to date and displayed in Reception and all staff working areas in school
- Ensure the Safeguarding display poster is up to date and displayed in reception and key student areas in school
- Complete the LSP Annual Audit for Child Protection / Safeguarding
- Have appropriate knowledge and training to protect and promote the welfare of a looked after child; holding details of looked after children and their contact information
- Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care
- Ensure all teachers are trained to manage a report of child-on-child sexual violence and sexual harassment
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children (including children with a social worker) are experiencing, or have experienced, with teachers, members of the leadership team and local authorities. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services)

#### **4.9.11 Deputy Designated Safeguarding Lead will:**

- Be a member of the Campus staff (Teaching or Support staff). This may also be the Campus Principal.
- Be given the authority, responsibility, time and resources to carry out the DDSL's role
- Have DDSL role defined as an appendix to their main job description
- Act in the absence of the DSL fulfilling their duties and responsibilities
- Be trained as a DSL by a LSP and be registered for safeguarding and child protection updates in each student locality

#### **4.9.12 Campus staff, including supply staff and volunteers will:**

- Know who holds the DSL and Deputy roles within the Campus
- Receive annual training and regular updates in safeguarding and child protection, (e.g. minuted staff meetings, e-bulletins etc.). Prevent awareness training and on-line safety will be part of this. Training also applies to the Head Teacher if he/she is not a Deputy DSL

- Be issued with a copy of the KCSIE Part 1 and Annex B at the start of the Autumn Term or upon their appointment. This will form part of the training for Safeguarding and Child Protection
- Volunteers will receive Part 1 of KCSIE
- School Staff and those who work directly with children will also receive Part 1 of KCSIE
- The school Senior Leadership Team will be required to read all of KCSIE
- Undertake the Annual Safeguarding Quiz to assess understanding of statutory requirements, which will be signed, dated and recorded along with a statement that they have read and understood the KCSIE guidance
- Adhere to the Staff Code of Conduct
- Be mindful that the Teacher Standards 2012 state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (teaching staff including Head Teachers)

#### **4.9.13 Campus Safeguarding Committee will:**

- Ensure that the Campus complies with its safeguarding obligations set out in relevant legislation, regulations and guidance and any rules issued by OSG UK
- Review safeguarding practice, in order to ensure the campus' fulfilment of its safeguarding obligations
- Work in partnership to ensure that the CSC is properly informed by appropriate information sharing and enabled to act effectively in addition to the specific roles of the DSL and DDSL
- Develop a holistic view of the safeguarding arrangements in place for individual students
- Identify and reflect on issues and patterns of concerns which may require a revision of safeguarding practice

#### **4.10 INDUCTION**

- The detail of the induction for new staff is set out in the Induction Policy. However, from a safeguarding perspective this will include new staff being given copies of:
- Safeguarding & Child Protection Policy (including role of the DSL and Children Missing in Education, CME guidance)
- Anti-Bullying Policy
- ICT & E-Safety Policy
- KCSIE part one and Annex B for those that work directly with children
- KCSIE Part one for volunteers
- Behaviour Management Policy
- Staff Code of Conduct (including whistleblowing, acceptable use of IT, staff/student relationships and guidance on social media usage)

- New staff will receive Face to Face Safeguarding training with the DSL at induction as well as a range of online courses via Flick Learning and will be required to complete a quiz on KCSIE part one and the Safeguarding & Child Protection Policy
- New staff will receive e safety induction training
- All new staff will receive training on Mental health awareness in young people
- All new staff will be made aware of the policy for the reporting of low-level concerns

## 5. PROCEDURES

The following procedures apply to all staff working in the Campus and will be covered by training to enable staff to understand their roles and responsibility. The aim of these procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

### 5.1 TAKING A DISCLOSURE

**5.1.1** Stay calm, spend time with the child and use your skill in communicating with children to understand what has gone on. Some key things to consider:

- observe any injuries but should not ask a child to remove or adjust their clothing to observe them
- allow the child to lead the discussion. Do take it seriously even if you find it shocking or unlikely
- ask open questions. You need to ask enough information to know the immediacy of any danger or significance of harm to the individual. It is not your role to get a detailed account and the individual may have to tell their story several more times
- accept what the student says without challenge — reassure them that they are doing the right thing and that you recognise how hard it is for them
- all staff should reassure victims that they are being taken seriously and that they will be supported and kept safe
- a victim should never be given the impression that they are creating a problem by reporting concerns, including abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report
- do not criticise the perpetrator
- do not make promises on about what will happen next nor that information provided will not be shared — reassure and explain that they have done the right thing and who needs to be told

- staff should not attempt to investigate, but should pass on to the DSL or DDSL
- 5.1.2** Is the disclosure from an individual alleging abuse to themselves or another? Is this the reporting of a concern or suspicion? Does it involve another child, a teacher/volunteer or friends/family away from school?
- 5.1.3** Is the response what you would expect? I.e., has medical attention been sought promptly? Are parents being protective?
- 5.1.4** Is it something that needs addressing right now? Is it something that requires some planning before the end of the school day?

## **5.2 CONCERNS ABOUT A CHILD**

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

- 5.2.1** Record a clear and comprehensive summary of the concern on Cpoms, these should be verbatim notes only, including no opinions or interpretations
- 5.2.2** Alert the DSL via Cpoms
- 5.2.3** Where there is an immediate concern for a child's safety, the member of staff must alert the DSL in person as the first port of call and log on Cpoms as soon as they can
- 5.2.4** If there is any doubt about recording requirements, staff should discuss with the DSL or DDSL
- 5.2.5** The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
- 5.2.6** For any concerns out of school hours and out of term time, for example when exams take place during the school holidays, if any concerns or disclosures are made aware to staff or volunteers, they must report this to the National Safeguarding Lead in the absence of the DSL. Please see contact details.
- 5.2.7** DSL must update the record on Cpoms (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including a clear and comprehensive summary of:
  - Dates and times of their observations
  - Dates, times and details of any discussions in which they were involved.
  - Any injuries
  - Explanations given by the child / adult
  - Any actual words or phrases used by the child
  - Any decisions made and a clear and comprehensive rationale for the decision
  - Details of how the concern was followed up and resolved
  - A note of action taken, decisions reached and the outcome
  - The records must be signed and dated by the author (or equivalent on CPOMS).

In the absence of the DSL or a DDSL, staff must be prepared to refer directly to Children's Social Care (and the police if appropriate) if there is the potential for immediate significant harm.

**NB: A referral regarding significant harm must be made immediately or at least within 24 hours**

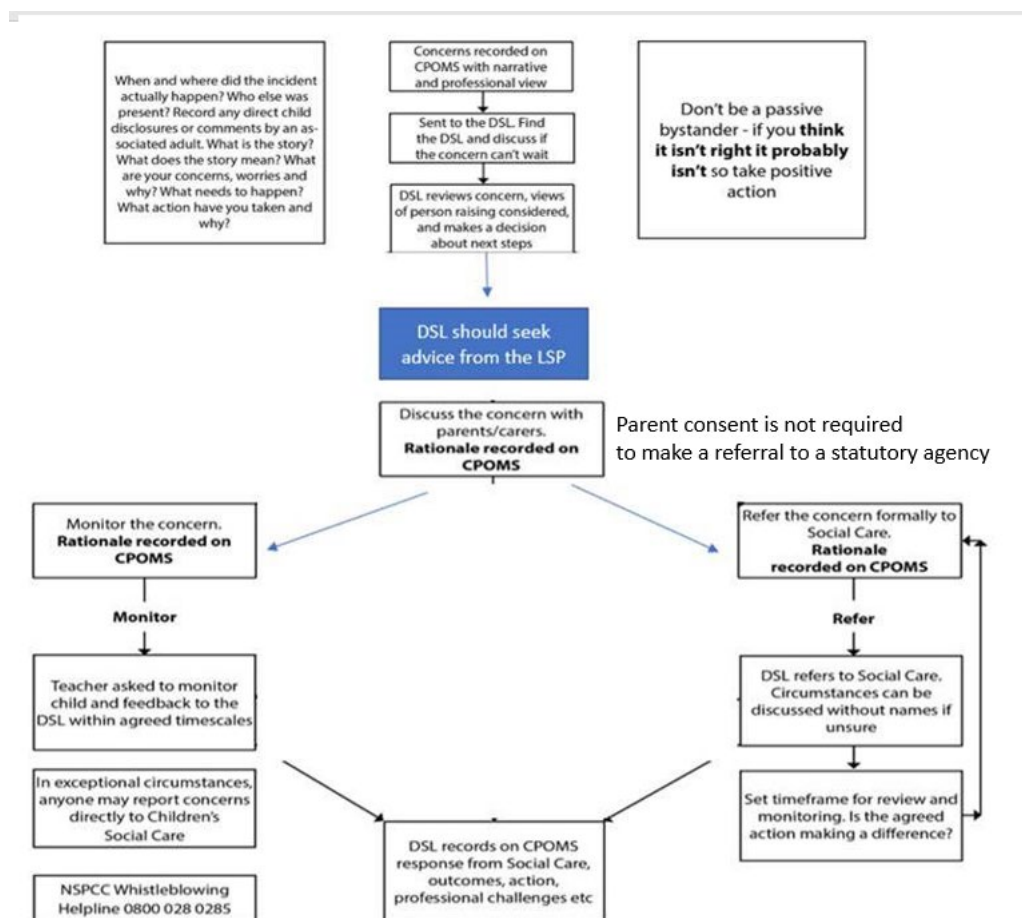
**5.2.8 The initial sharing of information may lead to:**

**5.2.8.1** A decision not to take any further action

**5.2.8.2** A strategy discussion at school which may lead to Early Help being offered in the case of those who are in need of additional support from one or more agencies but do not meet the threshold for referral to Children's Social Care. This could lead to inter-agency assessment and intervention using local processes, including the use of the 'Common Assessment Framework' (CAF) and 'Team around the Child' (TAC) approaches

**5.2.8.3** Making a referral to the police or social care services.

### **5.3 FLOW CHART FOR RAISING SAFEGUARDING CONCERNS**



## Parental consent

- 5.3.1 You should seek advice from the LSP on whether parents should be informed
- 5.3.2 You should seek to discuss concerns with parents/carers and, where possible seek agreement to make a referral unless this may, either by delay or the behavioural response it prompts place the child at increased risk of Significant Harm.
- 5.3.3 A decision not to seek parental permission before making a referral to Children's Social Care must be recorded and the reasons given. Likewise, where a parent has agreed to a referral this must be recorded and confirmed on the relevant Referral Form.
- 5.3.4 Having taken full account of the parent's wishes if it is still considered that there is a need for a referral:
  - 5.3.4.1 The reason for proceeding without parental agreement must be recorded
  - 5.3.4.2 The Children's Social Care team should be told that the parent has withheld her/his permission

## 5.4 INFORMATION AND DATA SHARING

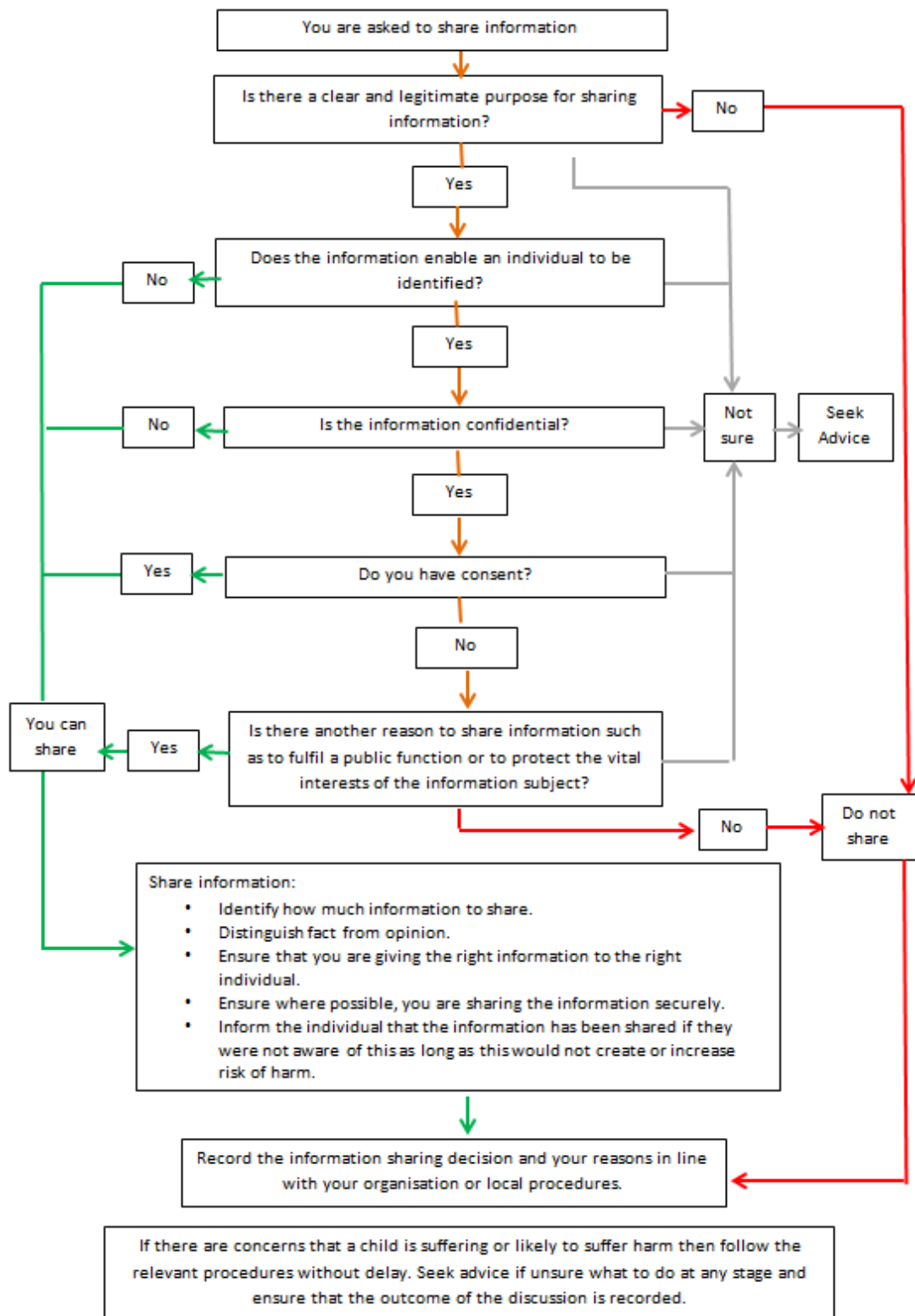


- 5.4.1** Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The school has clear powers to share, hold and use information for these purposes.
- 5.4.2** All matters relating to child protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance and the Terms of Reference of the Campus Safeguarding Committee.
- 5.4.3** The DSL must understand and convey to staff the relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- 5.4.3.1** The Board of Trustees will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
  - being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'
  - not provide pupils' personal data where the serious harm test under the legislation is met
- For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.
- 5.4.4** Information will be shared with staff within the Campus on a 'need-to-know' basis.
- 5.4.5** All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- 5.4.6** All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that

matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Head Teacher or DSL will only disclose information about a child to other members of staff on a need to know basis.

- 5.4.7** All staff will always undertake to share the intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## 5.5 FLOW CHART TO GUIDE INFORMATION SHARING



## 5.6 MAKING A REFERRAL

- 5.6.1 Concerns about children should be made to Children's Social Care for the area in which the child lives.
- 5.6.2 Any concerns about staff members should be referred to the Local Authority Designated Officer (LADO) from the area the Campus is based.
- 5.6.3 When deciding whether to make a referral following an allegation or suspicion or abuse the DSL should ensure they understand all the background and context to the allegation. What happened, when, who was present, what was said as well as the DSL's professional opinion and the action taken are incredibly important. If there is any doubt as to the threshold for referral then this Campus will discuss the matter initially on a no names basis with the Local Authority.
- 5.6.4 What appears minor at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus, the Campus should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse. **That said it is important to ask open questions in order to gain a reasonable understanding of all the circumstances. It is also very important to record exactly what was asked and what was said in response. This will be recorded on CPOMS.**
- 5.6.5 Children's social care assessments will consider where children are being harmed in contexts outside the home, so it is important that campuses 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
- 5.6.6 Keeping Children Safe in Education 2023 sets out that within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required.
- 5.6.7 This will include determining whether:
  - 5.6.7.1 The child requires immediate protection and urgent action is required
  - 5.6.7.2 The child is in need, and should be assessed under section 17 of the Children Act 1989
  - 5.6.7.3 There is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
  - 5.6.7.4 Any services are required by the child and family and what type of services, for example Early Help Services
  - 5.6.7.5 Further specialist assessments are required to help the local authority to decide what further action to take
  - 5.6.7.6 To see the child as soon as possible if the decision is taken that the referral requires further assessment.

- 5.6.8** The referrer should follow up if this information is not forthcoming. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment supported by the designated safeguarding lead (or deputy as required).
- 5.6.9** It is also very important that as professionals we recognise that if we are not content with the response from the Local Authority then we will potentially challenge the outcome utilising the local escalation process. Staff should follow up any referral with the Local Authority in which we do not have an established outcome.
- 5.6.10** Contact with Childrens' Social Care be done tentatively and without giving names in the first instance. However, Childrens' Social Care may request more details if they deem it necessary, in which case any details requested will be given.
- 5.6.11** Outcomes should be communicated to the initial referrer in broad terms if they are a member of staff so that they can be sure they have addressed their statutory responsibility. For others raising concerns that do not have that professional responsibility then confirmation that the matter has been addressed would ordinarily be sufficient. We must be clear the matter has been taken seriously and addressed appropriately.

## **5.7 ALLEGATIONS MADE AGAINST / CONCERNS RAISED IN RELATION TO TEACHERS, INCLUDING SUPPLY TEACHERS, OTHER STAFF, VOLUNTEERS AND CONTRACTORS**

- 5.7.1** The school has guidance which covers two levels of allegation / concern which must be followed:
- Allegations that may meet the harms threshold
  - Allegation / concerns that do not meet the harms threshold – referred to as 'low level concerns'

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

- 5.7.2** This process must be followed where it is alleged that anyone working within the school, including supply teachers, volunteers and contractors has:
- Behaved in a way that has harmed a child, or may have harmed a child and / or;
  - Possibly committed a criminal offence against or related to a child and/or;
  - Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or;
  - Behaved or may have behaved in a way that indicates that they may not be suitable to work with children
- 5.7.3** The last point includes behaviour that may have happened outside of school that might make the individual unsuitable to work with children, this is known as transferable risk
- 5.7.4** If in doubt over transferable risk, the campus must always seek advice from the LADO

- 5.7.5** All concerns / allegations about adults in the school including DSL should be raised with the Campus Principal immediately. Where the concern is about the Campus Principal this must be raised with the Regional Team Leader. This will then be referred to the LADO without informing the Campus Principal

#### **Initial response to an allegation**

- 5.7.6** Where the school identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately as per the guidance in part 1 of KCSIE.
- 5.7.7** When an allegation is made the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in part 1 of KCSIE.
- 5.7.8** The Case Manager (usually the Campus Principal) should discuss the case with the LADO, the nature, content and context of the allegation and agree a course of action.
- 5.7.9** The Campus Principal or Regional Team Leader (Depending on who the allegation is about) Should not investigate further until the LADO has been informed and has given guidance as to next steps. However, all appropriate actions should be taken immediately to ensure no student is placed at any risk of harm and as much information has been collected as is possible.
- 5.7.10** When dealing with allegations the school must:
- Apply common sense and judgement
  - Deal with allegations quickly, fairly and consistently
  - Provide effective protection for the child and support the person subject to the allegation

Please detail here the local authorities' arrangements for managing allegations, including contact details and what information the LADO will require when an allegation is made:  
What is the LADO referral process?

Referral must be made to the LADO within 24 hours of the allegation, using their on-line form

Where to get advice from:

How to make a referral- Make communication to the LADO via telephone

Contact details for LADO:

Lado – Michael Gedrim

Tele: 01597 826431

[Michael.gedrim@powys.peaple.gov.uk](mailto:Michael.gedrim@powys.peaple.gov.uk)

- 5.7.11** The school must be familiar with what initial information the LADO will require

- 5.7.12** When to inform the individual of the allegation should be considered carefully and, on a case by-case basis, with guidance as required from the LADO, and if appropriate children's social care and the police.
- 5.7.13** If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children social care will be convened in accordance with the statutory guidance [Working Together to Safeguard Children](#)
- 5.7.14** Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSL and make a risk assessment of the situation. It may be necessary for the DSL to make a referral to children's social care.
- 5.7.15 No Further Action;** Where the initial discussion leads to no further action the case manager and the LADO should:
  - 5.7.15.1** Record the decision and justification for it on Staff Safe
  - 5.7.15.2** Agree on what information should be put in writing to the individual concerned and by whom
- 5.7.16 Further Enquiries;** Where further enquiries are required to enable a decision about how to proceed, the campus must take advice from the LADO on next steps.
  - 5.7.16.1** The school must follow the same procedure for all staff, including supply staff, volunteers and contractors.
  - 5.7.16.2** When involving a supply agency, the school must inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to DBS as personnel suppliers.
  - 5.7.16.3** The school must invite the agency's HR Manager or equivalent to all meetings and keeping them up to date with information.
- 5.7.17 Governance;** If an allegation is made against a CA team member, member of the National Leadership Team or board, the school must follow its own procedures.
  - 5.7.17.1** Where an allegation is substantiated, they should follow the procedures to consider removing them from office.
- 5.7.18 Suspension**
  - 5.7.18.1** Suspension should not be an automatic response when an allegation is reported. The campus must consider all options to avoid suspension.
- 5.7.19** The case manager must consider carefully whether the circumstances warrant suspension from contact with children or until the allegation is resolved.
- 5.7.20** It should be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm or the case is so serious there may be grounds for dismissal. If in doubt the Case manager to seek advice from the LADO.
- 5.7.21** Where the school is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at the school, the school must take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual must not carry out teaching work.



- 5.7.22** Working with the Human Resources Business Partner (HRBP) the campus case manager must complete a risk analysis in working with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff:
- 5.7.22.1** Redeployment within the school so that the individual does not come into contact with the child or children concerned
  - 5.7.22.2** Providing an assistant to be present when the individual has contact with children
  - 5.7.22.3** Redeploying to alternative work in the school so the individual does not have unsupervised access to children
  - 5.7.22.4** Moving the child or children to where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views.
  - 5.7.22.5** Temporarily redeploying the member of staff to another role in a different location, for example another OSG school.
- 5.7.23** If immediate suspension is considered necessary, the case manager must record the rationale and justification for such action on Staff Safe.
- 5.7.24** The Campus must show a duty of care to their employees whilst any allegation is being investigated, they should:
- 5.7.24.1** Manage and minimise stress caused by the allegation
  - 5.7.24.2** Inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary
  - 5.7.24.3** Advise the individual to contact their trade union representative, or a colleague for support
  - 5.7.24.4** Appoint a named representative to keep the person informed about progress of the case
  - 5.7.24.5** Provide access to counselling or medical advice where appropriate
  - 5.7.24.6** Not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence
- 5.7.25** The case manager must take advice from the LADO, police and children's social care to agree the following:
- 5.7.25.1** Who needs to know and exactly what information can be shared
  - 5.7.25.2** Making necessary referrals to DBS and TRA as a consequence of the outcome of the investigation.
  - 5.7.25.3** How to manage speculation, leaks and gossip
  - 5.7.25.4** What, if any, information can be reasonably given to the wider community to reduce speculation; and

**5.7.25.5** How to manage press interest if, and when, it should arise.

**5.7.25.6** The school will make a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

**5.7.25.7** Where a referral has been made to the DBS, it should also be made to TRA. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to an TRA referral. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in Teacher misconduct: the prohibition of teachers. Further guidance is published on the DfE (TRA) website.

<https://www.gov.uk/government/collections/teacher-misconduct>

## **5.7.26 CONCERNS THAT DO NOT MEET THE HARM THRESHOLD (LOW LEVEL CONCERNS)**

**5.7.26.1** At OSG UK we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

**5.7.27** The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for harm. 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:

**5.7.27.1** 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.

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

**5.7.28.1** Being over friendly with children

**5.7.28.2** Having favourites

**5.7.28.3** Taking photographs of children on their mobile phone

**5.7.28.4** Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

**5.7.28.5** Using inappropriate sexualised, intimidating or offensive language.

**5.7.28.6** Humiliating pupils

**5.7.29** OSGUK ask that all staff must ensure that low level concerns are reported to the Campus Principal, these should be shared in person. Where they are not able to share this in person, it must be sent immediately to the Campus principal via e mail, in a password protected document.

**5.7.30** When a low-level concern has been raised by a third party, the campus principal should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

- 5.7.31** The purpose of the low-level concerns policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.
- 5.7.32** OSGUK will ensure the 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.
- 5.7.33** Will empower staff to share any low-level safeguarding concerns with the DSL
- 5.7.34** Address unprofessional behaviour and support the individual to correct it at an early stage.
- 5.7.35** Provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and,
- 5.7.36** Help identify any weakness in the school or colleges safeguarding system
- 5.7.37 Reporting low-level concerns.**
  - 5.7.37.1** Low-level concerns about a member of staff should be reported to the Campus Principal.
  - 5.7.37.2** Where a low-level concern is raised about the Campus or District Principal and local governance, it should be shared with the Regional Team Leader
  - 5.7.37.3** Where there is a low-level concern about a member of the RSO team, it should be reported to the Regional Managing Director
  - 5.7.37.4** Where there is a low-level concern about a member of the senior principal team it should be reported to the Regional Managing Director
  - 5.7.37.5** Where there is a low-level concern about a member of the national governance team, this should be reported to the Regional Managing Director
- 5.7.38** OSGUK will ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- 5.7.39** Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, that concern should be shared with the Campus Principal, and recorded in accordance with the school's low-level concern/staff code of conduct policy and their employer notified about so any potential patterns of inappropriate behaviour can be identified'.
- 5.7.40** Recording low-level concerns.
  - 5.7.40.1** All low-level concerns should be recorded in writing by the Campus Principal on Staff Safe
  - 5.7.40.2** 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.

**5.7.40.3** At OSGUK these records will be kept confidentially, and held securely on Staff Safe which complies with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

**5.7.40.4** Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms

threshold, in which case it should be referred to the LADO. The rationale for all decisions and actions taken must be recorded.

**5.7.41** Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

**5.7.42** This information will be retained until that person leaves employment with OSGU

**5.7.43** References

**5.7.43.1** OSGUK will only provide substantiated safeguarding allegations in references as per the guidance in KCSIE.

**5.7.43.2** Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

**5.7.44** It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference

## **5.8 DEALING WITH THE MEDIA**

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

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

that publication of material leading to the identification of the teacher who is the subject of the allegations is prohibited.

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

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

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

## **5.9 WHISTLEBLOWING**

5.9.1 In line with KCSIE Guidance all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding practices and know that such concerns will be taken seriously by the Senior Leadership Team.

5.9.2 Where a member of staff feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they should reference the schools Whistleblowing Policy; this document includes general guidance and advice on Whistleblowing and details of the NSPCC Whistleblowing helpline.

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

## **5.10 SOCIAL MEDIA**

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

## **5.11 COMPLAINTS**

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

## **5.12 EARLY HELP, CHILD IN NEED, CHILD AT RISK OF SIGNIFICANT HARM**

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

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

- 5.12.2 Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

#### **5.12.3 EARLY HELP**

- 5.12.3.1 If early help is appropriate, the DSL (or DDSL) 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.
- 5.12.3.2 The Campus will be prepared to identify children who may benefit from early help. This means providing support as soon as a problem emerges at any point in a child's life. All staff should understand their role in early help and support the assessment process. Staff are encouraged to discuss any early help requirements with the DSL.
- 5.12.3.3 The DSL will liaise with parents early on to ensure that early help will be effective. If the child or parents refuse consent to an Early Help Assessment, then further advice will be taken from the Local Authority. There may be a requirement to support other agencies and professionals in an early help assessment.

#### **5.12.4 CHILD IN NEED**

- 5.12.4.1 A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

#### **5.12.5 CHILD SUFFERING OR LIKELY TO SUFFER SIGNIFICANT HARM**

- 5.12.5.1 Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is

likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

### **5.13 EXTREMISM, RADICALISATION AND TERRORISM (THE PREVENT DUTY)**

- 5.13.1 The Campus has a statutory duty under The Counter-Terrorism and Security Act 2015 and the statutory Prevent Guidance 2023, to have due regard to the need to prevent people from being drawn into extremist ideology and radicalisation.
- 5.13.2 All DSL's, Campus Principals, CA Team Members, Senior Leaders, and Deputy DSL's will read updated guidance from the Government to help them understand how to safeguard our susceptible learners from radicalisation. [The Prevent duty: an introduction for those with safeguarding responsibilities - GOV.UK](https://www.gov.uk/government/publications/the-prevent-duty-an-introduction-for-those-with-safeguarding-responsibilities) ([www.gov.uk](https://www.gov.uk))
- 5.13.3 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.
- 5.13.4 Radicalisation is defined as the act or process of encouraging extremist views or actions in others, including forms of extremism leading to terrorism. Where a student is identified as being at risk of radicalisation, the DSL will consider the level of risk in order to identify the most appropriate referral, this could include Prevent or Children's Social Care, for example.
- 5.13.5 Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 5.13.6 The Campus will use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.
- 5.13.7 The Campus will assess the risk of children being drawn into terrorism, the campus will liaise with the LA to discuss what level the risk might be overall in their area - high medium or low
- 5.13.8 All campuses will have in place a Prevent Risk Assessment See appendix 7
- 5.13.9 The campus will go through a self-assessment process at least annually to review their policy and practices and understand how well embedded their Prevent policies and practices are. At OSG we encourage a cycle of continuous review



and improvement. The Campus will use the DFE tool to do this. [How to use the Prevent duty self-assessment tool for schools - GOV.UK \(www.gov.uk\)](#) [Prevent duty self-assessment tool for schools - GOV.UK \(www.gov.uk\)](#)

#### **5.14 CHILDREN ABSCONDING OR GOING MISSING FROM AN EDUCATIONAL SETTING**

5.14.1 Should a child abscond or go missing it is a potential for abuse and neglect and the Campus has a procedure in place detailed in the Attendance / Absent from / Missing in Education Policy to ensure the safeguarding of a child going missing, particularly on repeat occasions. If a child goes missing the following procedure will be applied:

- First day contact with parents
- If, at any stage during the school day a student is unaccounted for, the following procedure will be followed, in order, until the student is located or the police are informed:
- The Campus Principal (or the person deputising) is immediately informed and Reception is contacted to check there is not an authorised absence or departure from school
- The student's friends, peers and all staff are asked for information which might explain the absence
- A thorough search of site is conducted
- A fire drill is conducted
- The parents of the missing student are contacted
- The Campus Principal (or the person deputising) contacts the police
- The risk and time a student could be missing is minimised by the twice daily Registration procedure and individual lesson register taken

5.14.2 The school must ensure it has two contact numbers on file for every child as stated in KCSIE 2023

5.14.3 The Campus will inform the LA if a child is absent from school for 10 consecutive days or more without permission.

5.14.4 Additional information is available in KCSIE 2023 and the DfE Guidance Children Missing Education 2016 which details the process for reporting.

5.14.5 Removal of a Student from Roll:

5.14.5.1 The Campus will notify the Local Authority where the Campus is based when they are about to remove a student's name from the Campus admission register. Full details of the student will be provided to the LA when removing a student from roll and all reasonable enquiries will be made to establish the whereabouts of the child jointly with the LA.

5.14.6 Adding a student to Roll:

- 5.14.6.1 The LA for the child's locality will be informed within 5 days when adding a student to the admission roll at a non-standard transition point. Full details of the student will be provided to the LA.
- 5.14.7 A non-standard transfer includes transfer into our school at Year 3, as this is not a usual transition point in mainstream education.
- 5.14.8 This Guidance will also form part of the Admissions Policy.

## **5.15 ELECTIVE HOME EDUCATION**

- 5.15.1 Where a parent / carer expresses their intention to remove a child from school with a view to educate at home, the school must work with other key professionals involved to coordinate a meeting with parents / carers, ideally before a final decision is made. The aim of this meeting is to ensure that parents / carers have considered what is in the best interests of the child / children. This is particularly important where a child has SEND, is vulnerable, and / or has a social worker.
- 5.15.2 Schools will be familiar with the DFE guidance for local authorities on [Elective Home Education](#)
- 5.15.3 The school must inform the Local Authority of all deletions from their admissions register when a child is taken off roll (Education (Pupil Registration) (England) Regulations

## **5.16 CHILD ON CHILD ABUSE**

- 5.16.1 This section sets out the Campus' whole school approach to Child-on-Child abuse.
- 5.16.2 All staff should be aware that children can abuse other children (often referred to as Child-on-Child abuse) and that it can happen both inside and outside of school and online. The Campus has a zero-tolerance approach to any form of abuse, including Child on Child
- 5.16.3 All staff must be able to identify signs and indicators of Child-on-Child abuse and know how to identify it and respond to reports.
- 5.16.4 All students must be aware of the systems in place for them to report abuse. This includes the online reporting tool available as well as speaking to their Designated Safeguarding Lead.
- 5.16.5 All staff should understand, that even if there are no reports in their school does not mean child on child abuse is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding Child-on-Child abuse, they should speak to their designated safeguarding lead (or deputy).
- 5.16.6 All staff should be aware that girls are more likely to be victims and boys more likely to be perpetrators in child-on-child abuse cases

- 5.16.7 It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- 5.16.8 Child on Child abuse is most likely to include, but may not be limited to:
- 5.16.8.1 Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - 5.16.8.2 Abuse in intimate personal relationships between peers;
  - 5.16.8.3 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);
  - 5.16.8.4 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); For further information about sexual violence see Annex B of KCSIE.
  - 5.16.8.5 Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
  - 5.16.8.6 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;
  - 5.16.8.7 Consensual and non-consensual sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);
  - 5.16.8.8 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
  - 5.16.8.9 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).
- 5.17** All staff should be clear as to the school’s policy and procedures with regards to Child on Child 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. Training will be provided by the DSL at the start of the academic year as well as part of any induction

5.17.1 The DSL will investigate any allegations of child-on-child abuse. They will collate as much information as possible, where they feel it is appropriate and liaise with children's social care.

5.17.2 Where the DSL feels a criminal offence may have been committed, they should immediately seek advice from the local children social care or Police, to ensure there is no damage to the integrity of any investigation that the police may need to conduct.

5.17.3 Both the alleged Victim and alleged perpetrator will be provided with appropriate support

5.17.4 Procedures for minimising Child on Child abuse

5.17.4.1 The Campus will aim to minimise any incident of Child-on-Child abuse by ensuring that staff receive regular training so they are able to identify the indicators of abuse, so they know what to do to report a concern of abuse, they know how to respond and support where there is a concern of abuse.

5.17.4.2 The Campus will also ensure that the DSL undergoes more detailed training involving external agencies to develop a better understanding and insight into Child-on-Child abuse.

5.17.4.3 The campus will ensure that the staff at the campus challenge inappropriate behaviours

5.17.4.4 Pupils will be made aware that there are a variety of ways that they can express their views and concerns, such as the reporting button on the website as well as student voice opportunities

5.17.4.5 The campus will ensure that preventative education is covered in line with the PHSE and RSHE curriculum, where students are taught about such as consent, healthy relationships, online safety, recognising abusive and coercive behaviour. See RSHE policy.

## **5.18 CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**

5.18.4 The Campus will respond to all signs, reports and concerns of child-on-child sexual violence and harassment, including those that happen outside of school premises, and or online.

5.18.5 All staff working and volunteers working with students at the campus are advised to maintain an attitude of 'it could happen here', and this is especially important when considering child-on-child abuse.

5.18.6 Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into sixth form. It can occur also 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 face-to-face (both physically and verbally) and are never acceptable.

5.18.7 The Campus will be aware of:

- 5.18.7.1 • making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- 5.18.7.2 It should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- 5.18.7.3 recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- 5.18.7.4 challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- 5.18.7.5 Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the campus.

5.18.8 Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers

5.18.9 Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe

**5.18.10 SEXUAL VIOLENCE**

- 5.18.10.1 It is important that all staff and volunteers are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school/college.
- 5.18.10.2 When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003<sup>132</sup> as described below:

- 5.18.10.2.1 Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- 5.18.10.2.2 Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- 5.18.10.2.3 Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- All staff and volunteers should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- 5.18.10.2.4 Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

#### **5.18.11 What is Consent?**

- 5.18.11.1.1 Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom.
- 5.18.11.1.2 Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.
- a child under the age of 13 can never consent to any sexual activity
  - the age of consent is 16

- sexual intercourse without consent is rape.

#### **5.18.12 SEXUAL HARASSMENT**

5.18.12.1 When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college.

5.18.12.2 Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

5.18.12.3 Whilst not intended to be an exhaustive list, sexual harassment can include:

5.18.12.3.1 sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names

5.18.12.3.2 sexual “jokes” or taunting

5.18.12.3.2.1 physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes.

5.18.12.3.2.2 It is important that the campus consider the experience of the victim

5.18.12.3.2.3 displaying pictures, photos or drawings of a sexual nature

5.18.12.3.2.4 upskirting (this is a criminal offence), and

5.18.12.3.2.5 online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

5.18.12.3.2.5.1 It may include:

5.18.12.3.2.5.2 consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. See UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people

5.18.12.3.2.5.3 sharing of unwanted explicit content

5.18.12.3.2.5.4 sexualised online bullying or unwanted sexual comments and



messages, including, on social media

5.18.12.3.2.5.5 sexual exploitation; coercion and threats, and

5.18.12.3.2.5.6 coercing others into sharing images of themselves or performing acts they're not comfortable with online

5.18.12.3.2.6 It is important that as a campus we consider sexual harassment in broad terms. If not challenged sexual harassment can create a culture that if not challenged can normalise inappropriate behaviours and provide an environment that may lead to sexual violence

#### 5.18.13 HARMFUL SEXUAL BEHAVIOUR

5.18.13.1 Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. **HSB can occur online and/or face-to-face and can also occur simultaneously between the two.** HSB will be considered in a child protection context.

5.18.13.2 When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in Annex B of KCSIE.

5.18.13.3 It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing

an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding.

- 5.18.13.4 HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

#### **5.18.14 PREVENTING ABUSE**

- 5.18.14.1 The DSL will be clear, in advance, about what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred. It is important to prepare for this in advance and review this information on a regular basis to ensure it is up to date.
- 5.18.14.2 As such: if required, the designated safeguarding lead (or a deputy) should discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the school's or college's policies (especially the child protection policy) and responses, and
- 5.18.14.3 the designated safeguarding lead (and their deputies) should be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required.

#### **5.18.15 RESPONDING TO REPORTS OF SEXUAL VIOLENCE AND SEXUAL HARASSMENT**

- 5.18.15.1 systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously.
- 5.18.15.2 any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required.
- 5.18.15.3 The Campus DSL will refer to the case studies in part 5 of KCSIE to provide various options that are available to respond to reports of sexual violence and sexual harassment.

5.18.15.4 Local authority children's social care and the police will be important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. The designated safeguarding lead (or a deputy) should lead the campus response and should be aware of the local process for referrals to children's social care and making referrals to the police (also see the section "reporting to the police" on page 119 of KCSIE for further information). Further sources of support are listed on page 109 of KCSIE.

5.18.15.5 Online: The Campus should recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Sources of support are listed on page 109 of KCSIE.

#### **5.18.16 IMMEDIATE RESPONSE TO A REPORT**

5.18.16.1 It is important to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. As per Part one of KCSIE, **if staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.**

5.18.16.2 The initial response by the campus to a report from a child is incredibly important. How the campus responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

5.18.16.3 It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the campus should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a

report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

- 5.18.16.4 As per Part one of KCSIE, all staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:
- 5.18.16.4.1 if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy)
  - 5.18.16.4.2 careful management and handling of reports that include an online element. Including being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. There is advice available in KCSIE with more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection
  - 5.18.16.4.3 not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or deputy) or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to
  - 5.18.16.4.4 recognising that a child is likely to disclose to someone they trust: this could be anyone in the campus or volunteer team. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child
  - 5.18.16.4.5 recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma

can impact memory and so children may not be able to recall all details or timeline of abuse

- 5.18.16.4.6 keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation
- 5.18.16.4.7 listening carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was
- 5.18.16.4.8 considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.
- 5.18.16.4.9 only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. The campus should be aware that notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation, and
- 5.18.16.4.10 informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report

#### **5.18.16.5 CONSIDERING CONFIDENTIALITY AND ANONYMITY**

- 5.18.16.5.1 Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and

guidance from others in order to provide support and engage appropriate agencies

5.18.16.5.2 The campus should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

5.18.16.5.3 The victim may ask the campus not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice should be sought from the designated safeguarding lead (or deputy), who should consider the following

5.18.16.5.3.1 parents or carers should normally be informed (unless this would put the victim at greater risk)

5.18.16.5.3.2 the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and

5.18.16.5.3.3 rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

5.18.16.5.3.4 The designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

5.18.16.5.3.5 If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

5.18.16.5.3.6 Additional information on confidentiality and information sharing is available at [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](#) and NSPCC: Information sharing and confidentiality for practitioners [NSPCC research and resources | NSPCC Learning](#)

#### **5.18.16.5.4 ANONYMITY**

5.18.16.5.4.1 Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the campus should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

5.18.16.5.4.2 Relevant information can be found in: CPS: Safeguarding Children as Victims and Witnesses.

5.18.16.5.4.3 As a matter of effective safeguarding practice, the campus should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

5.18.16.5.4.4 The campus should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

#### **5.18.16.6 RISK ASSESSMENT**



5.18.16.6.1 When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence should consider:

5.18.16.6.2 the victim, especially their protection and support

5.18.16.6.3 Whether there may have been other victims

5.18.16.6.4 the alleged perpetrator(s)

5.18.16.6.5 all the other children, (and, if appropriate, adult students and staff) at the campus, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and

5.18.16.6.6 • The time and location of the incident, and any action required to make the location safer.

5.18.16.7 Risk assessments should be recorded (paper or electronic) and should be kept under review. At all times, the campus should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

5.18.16.8 The designated safeguarding lead (or a deputy) should ensure they are engaging with local authority children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above campus risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the campus approach to supporting and protecting their pupils and students and updating their own risk assessment.

#### **5.18.17 ACTION FOLLOWING A REPORT OF SEXUAL VIOLENCE AND / OR SEXUAL HARASSMENT**

5.18.17.1 Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of '**it could happen here**'. The campus should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The designated safeguarding lead (or deputy) is likely to have a

complete safeguarding picture and be the most appropriate person to advise on the initial response by the campus. Important considerations will include

- 5.18.17.1.1 the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children
- 5.18.17.1.2 the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- 5.18.17.1.3 the ages of the children involved
- 5.18.17.1.4 the developmental stages of the children involved
- 5.18.17.1.5 any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- 5.18.17.1.6 if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- 5.18.17.1.7 that sexual violence and sexual harassment can take place within intimate personal relationships between children
- 5.18.17.1.8 importance of understanding intra familial harms and any necessary support for siblings following incidents
- 5.18.17.1.9 are there ongoing risks to the victim, other children, adult students or campus staff, and
- 5.18.17.1.10 other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

5.18.17.2 As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the campus should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be

given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

### **5.19 Children Sharing a Classroom**

- 5.19.4 Reports of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing.
- 5.19.5 Whilst the DSL / DDSL establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim.
- 5.19.6 The school will also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).
- 5.19.7 For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately. In all cases, the initial report should be carefully evaluated. The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions

### **5.19.8 OPTIONS TO MANAGE THE REPORT**

- 5.19.8.1 It is important that the campus consider every report on a case-by-case basis as per paragraph 482 of KCSIE. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to local authority children's social care and/or the police, then, as a general rule, the DSL should speak to the local authority children's social care and the police and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the campus taking immediate action to safeguard its children, where required.
- 5.19.8.2 There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. The four scenarios are:
  - 5.19.8.2.1 **Manage internally.**
    - 5.19.8.2.1.1 In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned

are not in need of early help or that referrals to statutory services are not required, and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

5.19.8.2.1.2 Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

5.19.8.2.1.3 All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic)

#### **5.19.8.2.2 Early help**

5.19.8.2.2.1 In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later.

5.19.8.2.2.2 Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

5.19.8.2.2.3 It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.

5.19.8.2.2.4 The campus as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their

deputies) will need to familiarise themselves with this document.

- 5.19.8.2.2.5 Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).
- 5.19.8.2.2.6 Whatever the response, it should be underpinned by the principle that there is zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- 5.19.8.2.2.7 All concerns, discussions, decisions and reasons for decisions should be recorded on Cpoms.
- 5.19.8.2.2.8 Where a child has been harmed, is at risk of harm, or is in immediate danger, the campus should make a referral to local authority children's social care.
- 5.19.8.2.2.9 At the point of referral to local authority children's social care, the campus will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of local authority children's social care.
- 5.19.8.2.2.10 If a referral is made, local authority children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- 5.19.8.2.2.11 Where statutory assessments are appropriate, the campus (especially the designated safeguarding lead or a deputy) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- 5.19.8.2.2.12 The campus should not wait for the outcome (or even the start) of a local authority children's social care investigation before protecting the

victim and other children in the campus. It will be important for the designated safeguarding lead (or a deputy) to work closely with local authority children's social care (and other agencies as required) to ensure any actions the campus takes do not jeopardise a statutory investigation. The risk assessment as per paragraph 479-481 in KCSIE will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report, and all children at the school or college should be immediate.

5.19.8.2.2.13 In some cases, local authority children's social care will review the evidence and decide that a statutory intervention is not appropriate. The campus (generally led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm or if circumstances change. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.

5.19.8.2.2.14 Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

5.19.8.2.2.15 All concerns, discussions, decisions and reasons for decisions should be recorded on cpoms.

### **5.19.8.2.3 Reporting to the Police**

5.19.8.2.3.1 Any report to the police will generally be in parallel with a referral to local authority children's social care (as above).

5.19.8.2.3.2 It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.

- 5.19.8.2.3.3 Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help schools and colleges decide when to engage the Police and what to expect of them when they do: When to call the police.
- 5.19.8.2.3.4 Where a report has been made to the police, the campus should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity
- 5.19.8.2.3.5 At this stage, the campus will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the campus is supporting the child in any decision they take. This should be with the support of local authority children's social care and any appropriate specialist agencies.
- 5.19.8.2.3.6 All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.
- 5.19.8.2.3.7 In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the campus continue to engage with specialist support for the victim and alleged perpetrator(s) as required.



- 5.19.8.2.3.8 Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.
- 5.19.8.2.3.9 If the campus has questions about the investigation, they should ask the police. The police will help and support the campus as much as they can (within the constraints of any legal restrictions).
- 5.19.8.2.3.10 Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- 5.19.8.2.3.11 All concerns, discussions, decisions and reasons for decisions should be recorded on cpoms.

#### **5.19.8.2.4 Considering bail conditions**

- 5.19.8.2.4.1 The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.
- 5.19.8.2.4.2 Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.
- 5.19.8.2.4.3 Whatever arrangements are in place, the campus will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution.
- 5.19.8.2.4.4 Particular regard should be given to: the additional stress and trauma that might be

caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc). 519. Careful liaison with the police investigators should help to develop a balanced set of arrangements

### **5.19.8.3 MANAGING ANY DELAYS IN THE CRIMINAL PROCESS**

- 5.19.8.3.1 There may be delays in any case that is being progressed through the criminal justice system. The campus should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the campus. The risk assessment will help inform any decision.
- 5.19.8.3.2 Considering any disciplinary action against the alleged perpetrator(s) whilst an investigation is ongoing is discussed below in the alleged perpetrator(s) section.
- 5.19.8.3.3 Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the campus take do not jeopardise the police investigation.
- 5.19.8.3.4 If the campus have questions about the investigation, they should ask the police. The police will help and support the campus as much as they can (within the constraints of any legal restrictions)

### **5.19.8.4 THE END OF THE CRIMINAL PROCESS**

- 5.19.8.4.1 If a child is convicted or receives a caution for a sexual offence, the campus should update its risk assessment, ensure relevant protections are in place for all the children at the campus and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school or college as the victim, the campus should be very clear as to their expectations regarding the perpetrator(s) now they have

been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the campus thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.

- 5.19.8.4.2 Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the campus. It will be important that the campus ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online)
- 5.19.8.4.3 Where cases are classified as "no further action" by the police or Crown Prosecution Service, or where there is a not guilty verdict, the campus should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. The campus should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is/are also likely to require ongoing support for what will have likely been a difficult experience

#### **5.19.8.5 UNSUBSTANTIATED, UNFOUNDED, FALSE OR MALICIOUS REPORTS**

- 5.19.8.5.1 As set out in paragraph 68 of Part one of KCSIE, all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded on Cjoms. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.
- 5.19.8.5.2 If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate.
- 5.19.8.5.3 If a report is shown to be deliberately invented or malicious, the campus, should consider whether any

disciplinary action is appropriate against the individual who made it as per their own behaviour policy

#### **5.19.8.6 ONGOING RESPONSE**

##### **5.19.8.6.1 Safeguarding and Supporting the Victim**

5.19.8.6.2 The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

5.19.8.6.2.1 The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the campus is a safe space for them.

5.19.8.6.2.2 Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The campus should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

5.19.8.6.2.3 The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

5.19.8.6.2.4 Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

5.19.8.6.2.5 The campus should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and

non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

5.19.8.6.2.6 It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the campus should decide on a course of action. Consideration should be given as to whether there are wider cultural issues within the campus that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again

5.19.8.6.2.7 Support could include:

- Early Help
- Children and Young Peoples Independent Sexual Violence Advisors (ChISVAs)
- Child and young peoples mental health services (CYPMHS)
- Specialist Sexual Violence sector charities
- NHS
- Childline
- Internet Watch Foundation

5.19.8.6.3 Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the campus should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as is reasonably possible). The campus should respect and support this choice.

5.19.8.6.4 Children who have experienced sexual violence display a very wide range of responses to their experience,

including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. The campus should remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is

- 5.19.8.6.5 While the campus should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, the campus should provide a physical space for victims to withdraw.
- 5.19.8.6.6 It may be necessary for the campus to maintain arrangements to protect and support the victim for a long time. The campus should be prepared for this and should work with local authority children's social care and other agencies as required.
- 5.19.8.6.7 It is therefore important that the designated safeguarding lead (or a deputy) knows how and where to seek support.
- 5.19.8.6.8 It is important that the campus do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
- 5.19.8.6.9 Whilst they should be given all the necessary support to remain in their campus, if the trauma results in the victim being unable to do this, alternative provision or a move to another OSG Campus should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).
- 5.19.8.6.10 It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

Information sharing advice referenced at paragraphs 114-122 of KCSIE will help support this process

#### **5.19.8.7 Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour**

5.19.8.7.1 The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

- The campus will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. More information on HSB can be found at paras 454- 457 of KCSIE. Advice should be taken, as appropriate, from local authority children's social care, specialist sexual violence services and the police
- Other resources area available for support and can be located on page 130 of KCSIE

5.19.8.8 The campus can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file. Information sharing advice referenced at paragraphs 114-122 of KCSIE will help support this process

5.19.9 Discipline and the alleged perpetrator(s) Schools



- 5.19.9.1 With regard to the alleged perpetrator(s), advice on behaviour and discipline in schools is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent the campus from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for the campus and should be carefully considered on a case-by-case basis.
- 5.19.9.2 The designated safeguarding lead (or a deputy) should take a leading role.
- 5.19.9.3 The campus should consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or local authority children's social care should help the campus make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the campus to reach its own view about what happened while an independent investigation is considering the same facts.
- 5.19.9.4 Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. The campus should be very clear as to what its approach is. On the one hand there is preventative or forward-looking action to safeguard the victim and/or the perpetrator(s), especially where there are concerns that a perpetrator themselves may have been a victim of abuse; and, on the other, there is disciplinary action to punish a perpetrator for their past conduct. The campus should be very clear as to which category any action they are taking falls or whether it is really both and should ensure that the action complies with the law relating to each relevant category.

#### **5.19.10 Working with Parents and Carers**

- 5.19.10.1 The campus will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. The campus should carefully consider what

information they provide to the respective parents or carers about the other child involved and when they do so. In some cases, local authority children's social care and/or the police will have a very clear view and it will be important for the campus to work with relevant agencies to ensure a consistent approach is taken to information sharing.

- 5.19.10.2 It is good practice for the campus to meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.
- 5.19.10.3 It is also good practice for the campus to meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed.
- 5.19.10.4 The designated safeguarding lead (or a deputy) would generally attend any such meetings. Consideration to the attendance of other agencies should be considered on a case-by-case basis.
- 5.19.10.5 Clear behaviour policies and child protection policies, especially policies that set out the principles of how reports of sexual violence will be managed and how victims and alleged perpetrators are likely to be supported, that parents and carers have access to, will, in some cases, help manage what are inevitably very difficult conversations.
- 5.19.10.6 Parents and carers may well struggle to cope with a report that their child has been the victim of a sexual assault or is alleged to have sexually assaulted another child. Details of organisations that support parents are provided in Annex B of KCSIE The campus should consider signposting parents and carers to this support.

#### **5.19.11 Safeguarding Other Children**

- 5.19.11.1 Consideration should be given to supporting children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.
- 5.19.11.2 Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". The campus should be doing all they can to ensure both the victim and

alleged perpetrator(s), and any witnesses, are not being bullied or harassed.

- 5.19.11.3 Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves. Specialist online safety support is discussed at page 109 of KCSIE.
- 5.19.11.4 School transport is a potentially vulnerable place for a victim or alleged perpetrator(s) following any incident or alleged incident. The campus, as part of its risk assessment should consider any additional potential support needs to keep all of their children safe.
- 5.19.11.5 A whole campus approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated, and a strong preventative education programme will help create an environment in which all children at the school or college are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.
- 5.19.11.6 The campus will keep their policies, processes, and curriculum under constant review to protect all their children. Reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum. Alongside this, patterns identified in schools may also be reflective of the wider issues within a local area and it would be good practice to share emerging trends with safeguarding partners.

## **5.20 CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND) OR HEALTH ISSUES**

- 5.20.4** Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.
- 5.20.5** Additional barriers can exist when recognising abuse and neglect in this group of children.
- 5.20.6** These can include:

- 5.20.6.1** assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- 5.20.6.2** these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- 5.20.6.3** the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs,
- 5.20.6.4** communication barriers and difficulties in managing or reporting these challenges.
- 5.20.6.5** cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

## **5.21 HELPING CHILDREN TO KEEP THEMSELVES SAFE INCLUDING ONLINE**

### **(Including when they are online at home)**

- 5.21.4 Children at the Campus are taught to recognise, self-reflect and manage risk through both the Campus Personal, Social, Health and Economic Education (PSHEE) curriculum and the Relationship and Sex Education (RSE) Curriculum, lessons and rehearsed throughout all aspects of Campus life.
- 5.21.5 This will include covering relevant issues through Relationships Education and Relationships and Sex Education, online safety week, the Campus tutor-time programme.
- 5.21.6 Where children are learning online at home the Campus will follow advice from the DfE on safeguarding and remote education (DfE 2021b).
- 5.21.7 The Campus acknowledges that many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.
- 5.21.8 The Campus has a whole school approach to online safety. The approach is designed to educate pupils, students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. This should include:
  - 5.21.8.1 Discussion about risk, promoting sensible behaviour
  - 5.21.8.2 Teaching children how to conduct themselves and how to behave in a responsible manner
  - 5.21.8.3 Reminding children about e-safety, mobile devices and tackling bullying procedures

- 5.21.8.4 The campuses approach to online safety is covered in the ICT and E Safety Policy
- 5.21.9 The main areas of online risk are:
  - 5.21.9.1 Content - exposure to inappropriate or harmful content
  - 5.21.9.2 Contact - being subjected to harmful online interaction with other users
  - 5.21.9.3 Conduct - personal online behaviour that increases the likelihood of, or causes, harm
  - 5.21.9.4 Commerce – Risks such as online gambling, inappropriate advertising, phishing and or financial scams. Where students or staff are at risk of phishing, we will report it to the anti-phishing working group (<https://apwg.org>)
- 5.21.10 We will never achieve risk-aware young people who can keep themselves safe, by over-blocking content.
- 5.21.11 There will be training for parents in e-safety, delivered by the Campus, overseen by the DSL. Parent engagement will be tracked, to guide intervention and catch-up for any parents/carers unable to engage.
- 5.21.12 The Campus promotes an ethos of respect for students and they must be aware of who to speak to in confidence about any worries they may have, including electronic reporting with the e-safety button.

## **5.22 ICT & E-SAFETY**

- 5.22.4 This Campus has a separate ICT & E-Safety policy. It details the roles and responsibilities of the whole school community as well as the method for filtering and monitoring. Breaches are reported in accordance with the ICT & E-Safety policy.
- 5.22.5 The ICT & E-Safety Policy also covers how to keep students safe whilst learning online at home

## **5.23 FILTERING & MONITORING**

- 5.23.4 The DSL will take lead on ensuring the campus has appropriate and effective filtering and monitoring systems in place, and is compliant with all standards [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(\[www.gov.uk\]\(http://www.gov.uk\)\)](#)

## **5.24 E-SAFETY REPORTING BUTTON**

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

## **5.25 CHILD CRIMINAL EXPLOITATION: CCE INCLUDING SERIOUS VIOLENCE**

5.25.4 CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

5.25.5 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.

5.25.6 CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

5.25.7 As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

5.25.7.1 These may include increased absence from school;

5.25.7.2 a change in friendships or relationships with older individuals or groups,

5.25.7.3 a significant decline in performance,

5.25.7.4 signs of self-harm or a significant change in wellbeing,

5.25.7.5 or signs of assault or unexplained injuries.

5.25.8 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 and may be at risk of criminal exploitation; All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education.

5.25.9 The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too.

5.25.10 It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

KCSIE 2023 Annex B contains additional indicators of CSE. All staff and volunteers will be trained in the signs of CSE.

The Home Office have produced guidance *Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults: county lines*

## **5.26 CHILD SEXUAL EXPLOITATION (CSE)**

- 5.26.4 CSE is a form of child sexual abuse.
- 5.26.5 CSE can occur over time or be a one off occurrence and may happen without the child's immediate knowledge.
- 5.26.6 CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.
- 5.26.7 The victim may have been sexually exploited even if the sexual activity appears consensual.
- 5.26.8 Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.
- 5.26.9 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. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
- 5.26.10 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 (for example through others copying videos or images they have created and posted on social media).
- 5.26.11 Keeping Children Safe 2023 Annex B contains additional indicators of CSE. All staff and volunteers will be trained in the signs of CSE.
- 5.26.12 Reporting of concerns to the Campus Principal, however low-level the concern may seem, is always essential to highlight early concerns and ensure they are followed up by the Campus Principal. Equally, if there are concerns about the conduct of staff or volunteers, these should be reported to the Campus Principal immediately.
- 5.26.13 However low level a concern appears, it is critical for it to be followed up straight away.

## **5.27 COUNTY LINES**

- 5.27.4 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".



- 5.27.5 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.
- 5.27.6 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.
- 5.27.7 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 school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.
- 5.27.8 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 by the DSL at campus
- 5.27.9 Further examples of indicators of potential involvement in county lines can be found in KCSIE

## **5.28 CHILDREN WITH SEXUALLY HARMFUL BEHAVIOUR**

- 5.28.4 The management of children and young people with sexually harmful behaviour is complex and the Campus will work with other agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a student's sexual behaviour should speak to the DSL as soon as possible.

## **5.29 DOMESTIC ABUSE**

- 5.29.4 The cross-government definition of domestic violence and abuse is:  
Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.
- 5.29.5 Children can be victims of Domestic Abuse
- 5.29.6 They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- 5.29.7 Advice on identifying children who are affected by domestic abuse and how they can be helped is available at: NSPCC UK ([www.nspcc.org.uk](http://www.nspcc.org.uk))

- 5.29.8 All staff and volunteers must be alert and must report any concerns, however low-level they may seem, to the Designated Safeguarding Lead, so that concerns can be reviewed, and patterns of information built up.
- 5.29.9 Operation Encompass Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place. All campuses will work and liaise with Operation encompass teams where applicable

### 5.30 FEMALE GENITAL MUTILATION (FGM)

- 5.30.4 (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence and there are no medical reasons to carry out FGM
- 5.30.5 The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify Police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.
- 5.30.6 Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out and discuss such cases with the safeguarding lead (unless they have good reason not to) and Children's Social Care. The duty does not apply in relation to at risk or suspected cases. At risk or suspected cases should follow standard safeguarding arrangements.

### 5.31 MENTAL HEALTH

- 5.31.4 The school has a Mental health and wellbeing policy which raises awareness of mental health signs and potential indicators and responses to mental health concerns and how to support students.**

All staff must also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- 5.31.5 The Campus has a Senior Mental Health Lead, who is named at the start of this policy. They will either be a member of or supported by the senior

leadership team. They will receive appropriate training to allow them to fulfil the duties of the role.

- 5.31.6 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 5.31.7 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. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- 5.31.8 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken in reporting to the designated safeguarding lead at the campus.
- 5.31.9 The DSL or mental health lead will ensure that all staff undertake mental health awareness training
- 5.31.10 The Campus acknowledges that it has an important role to play in supporting the mental health and wellbeing of their pupils.
- 5.31.11 The Campus has a clear system in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. See Mental Health and Wellbeing Policy.
- 5.31.12 Where there is a significant concern for a child's mental health and wellbeing the campus will complete a mental health / wellbeing risk assessment, and this will be reviewed at regular intervals in accordance with the Mental Health and Wellbeing Policy.

## **5.32 FORCED MARRIAGE**

- 5.32.4 A forced marriage is one in which one or both parties do not consent to the marriage but are coerced into it (may include the use of violence and threats). This is not the same as an arranged marriage which is common in many cultures.

## **5.33 HOMELESSNESS**

- 5.33.4 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- 5.33.5 The designated safeguarding lead (and deputy) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- 5.33.6 Indicators that a family may be at risk of homelessness include household debt and domestic abuse 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 replace a referral into children's social care where a child has been harmed or is at risk of harm.

5.33.7 It should also be recognised in some cases 16 and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or deputy) should ensure appropriate referrals are made based on the child's circumstances.

5.33.8 The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17-year olds who may be homeless and/ or require accommodation.

#### **5.34 HONOUR-BASED ABUSE (HBA)**

5.34.4 HBA is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is a collection of practices which are used to control behaviour in families and other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators believe that a relative has shamed the family or community.

5.34.5 HBA might be committed against individuals who:

- Become involved with a boyfriend/girlfriend from a different religion or culture
- want to get out of an arranged or forced marriage
- wear clothes or take part in activities that are not considered 'traditional' within a particular culture

#### **5.35 CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS**

5.35.4 Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child.

5.35.5 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.

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

#### **5.36 CHILDREN AND THE COURT SYSTEM**

**5.36.4** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

**5.36.5** There are two age-appropriate guides to support children 5-11-year olds and 12-17 year olds.

- 5.36.6** The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.
- 5.36.7** Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **5.37 CHILDREN WITH FAMILY MEMBERS IN PRISON**

- 5.37.4** 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.
- 5.37.5** The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **5.38 CYBER CRIME**

- 5.38.4** Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).
- 5.38.5** Cyber-dependent crimes include;
- 5.38.6** unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- 5.38.7** denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- 5.38.8** making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
- 5.38.9** Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as

fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

### **5.39 SHARING OF NUDES AND SEMI NUDES IMAGES / VIDEOS (ALSO KNOWN AS SEXTING OR YOUTH PRODUCED SEXUAL IMAGERY)**

5.39.4 UK Council for Internet Safety (UKCIS) has published non-statutory guidance on managing incidents of nudes and semi nudes being shared by under-18s. The UKCIS guidance is non-statutory but should be read alongside KCSIE 2023. It should be followed unless there's a good reason not to do so.

5.39.5 The advice uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nudes or semi-nude images, videos or live streams by young people under the age of 18 online.

5.39.6 Indecent imagery is the legal term used to define nudes or semi-nude images and videos of children and young people under the age of 18. Many professionals may refer to 'nudes and semi-nudes' as: youth produced sexual imagery, youth involved sexual imagery, sexting or image based sexual abuse.

5.39.7 Incidents defined as sharing nudes and semi-nudes include: :

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

5.39.8 Incidents not covered by the guidance:

- the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and education settings should always inform their local police force as a matter of urgency

5.39.9 • children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images. Our response should be guided by the 'principle of proportionality' (see UKCIS Non statutory guidance sharing nudes and semi-nudes advice for education settings working with children and young people, section 1.6 (a)).

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

- Indecent is not defined in legislation, indecent imagery does not always mean nudity, however images are likely to be defined as such if they met one or more of the following criteria;
- nude or semi-nude sexual posing e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

The law criminalising indecent images of children was created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children and young people.

5.39.11 When responding to suspected youth produced sexual imagery the actual images must not be viewed. In determining the response, the DSL will consider if the circumstances are 'experimental' or 'aggravated' (Wolak and Finkelhor, 2011).

5.39.12 If the Campus has decided that involving other agencies is not necessary, consideration should be given to deleting the nudes and semi-nudes from devices and online services to limit any further sharing. It is recommended that students are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated within an agreed deadline. Any refusal to delete the images should be treated seriously, reminding the student that possession is unlawful.

5.39.13 All incidents relating to nudes and semi-nudes being shared must be recorded on Cpoms. This includes incidents that have been referred to external agencies and those that have not.

5.39.14 Incidents that have not been reported out to police or children's social care, campuses must record their reason for doing so and ensure it is signed off by the Campus Principal

#### **5.40 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.



#### **5.41 PERSONAL EDUCATION PLAN AND LOOKED AFTER CHILDREN**

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

#### **5.42 SUPPORT IN CAMPUS**

- 5.42.4 All class teachers and year group leaders are responsible, in conjunction with other Campus staff, for the pastoral needs of the children in their care. This includes maintaining opportunity for children to share their concerns and follow the guidance in this document. Care should always be taken in regard to the discussion of sensitive issues and advice should be sought from a DSL where there are concerns.
- 5.42.5 Within the curriculum there will also be opportunities to discuss issues which some children might find sensitive. Care should be taken particularly in relation to discussion about families and their make-up. Assumptions about members of families and the presence of both parents should be avoided both in discussion and the presentation of materials. Staff should make themselves familiar with the background of the children in their care in order to avoid distress.

#### **5.43 PHYSICAL CONTACT WITH STUDENTS**

- 5.43.4 Physical contact with students must be avoided. The Staff Code of Conduct sets out expectations around professional behaviour.

#### **5.44 RECORD KEEPING**

- 5.44.4 Child Protection records should be retained by the last school attended. The long-term security of relevant safeguarding documents and related correspondence is crucial should allegations of abuse arise. All such documents must be securely retained from the date of birth of the student plus 50 years. For further information please refer to the Retention of Records policy.
- 5.44.5 Storage provisions for all such documents must be arranged in the event of the School / Education Trust ceasing operations. Storage in these circumstances would be at the office of a solicitor, accountant or at a professional secure storage company.
- 5.44.6 The following information should be retained for a minimum of 50 years:
- 5.44.6.1 A copy of Safeguarding Policies and revisions thereof

- 5.44.6.2 Records of safeguarding training
- 5.44.6.3 Records of abuse allegations or incidents including notification to the appropriate authorities
- 5.44.6.4 Copies of relevant information and accompanying correspondence relating to abuse of students whilst in your care
- 5.44.6.5 Copies of your historical public liability insurance policies

#### **5.45 TRANSFERRING FILES**

- 5.45.4 The DSL is responsible for ensuring that the Child Protection Files are transferred to each school that a child moves to (e.g. primary to secondary) and the transfer must be conducted securely. It is good practice to request a receipt from the accepting school. The DSL will carefully consider what is transferred but it is important to give the receiving school a good understanding of any issues, a clear narrative and action taken. It may well be appropriate for the current DSL to make contact with the receiving school to assist with understanding. If a child has siblings that are staying in the same Campus, it is important to keep a copy of that child's file to retain context/background.
- 5.45.5 It is important to transfer files of a moving pupil to enable the new school to be prepared for the pupil when they arrive
- 5.45.6 The Designated Safeguarding Lead will:
  - 5.45.6.1 Ensure transfer of Child Protection Files to the new school without delay; within 5 days. Ask for confirmation of receipt from the receiving school
  - 5.45.6.2 Send separately from the student's general school file

#### **5.46 PARENT ACCESS TO EDUCATIONAL RECORDS**

- 5.46.4 Other than in exceptional circumstances, Campuses must make available for inspection or provide a copy of a student's educational record if requested to do so in writing by a parent or student. This must be supplied within 30 days of a request.
- 5.46.5 Educational record means any information processed relating to the student or former student of the Campus which originated from or was supplied by any member of staff, the student themselves or a parent of that student. The Educational Record must not disclose any information which you would be prohibited from sharing with the student themselves under the GDPR 2018 or which that the student would have no right to access themselves such as consider third party information.
- 5.46.6 In some circumstances access can be refused, for example, providing information about social services or related activities, if disclosure may cause serious harm to the physical or mental health of the student, releasing information that would be likely to prejudice an ongoing criminal

investigation or confidential communications between client and professional legal adviser.

#### **5.47 PARTNERSHIP WITH PARENTS**

- 5.47.4 The Campus has an established approach to working with parents – for parents' training and for liaison in the event of a child protection concern.
- 5.47.5 Key to this is the cultural tone set by the Campus Principal and CA team in terms of what good safeguarding practice looks like and what can be expected.
- 5.47.6 Parents' and children's need for privacy will be respected and such a position is supported by the Data Protection Act (GDPR) 2018. However, the priority is the needs of the child and effective liaison is crucial unless such action would put a child or vulnerable adult at risk of harm.
- 5.47.7 It should be recognised that families from different backgrounds and cultures will have different approaches to child-development. These differences should be acknowledged and respected provided they do not place the child at risk.

#### **5.48 PRIVATE FOSTERING**

- 5.48.4 Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or close relative. Close relatives are defined by Section 105 Children Act 1989 as a grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent
- 5.48.5 To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous. That continuity will not be disrupted by occasional short breaks
- 5.48.6 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.
- 5.48.7 The school has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.
- 5.48.8 Campus staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated

safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The Campus itself has a duty to inform the local authority of the private fostering arrangements.

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

#### **5.49 MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM**

- 5.49.4 Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.
- 5.49.5 Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. [Modern Slavery: Statutory Guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and Non-Statutory Guidance for Scotland and Northern Ireland \(publishing.service.gov.uk\)](#)

#### **5.50 SAFEGUARDING STUDENTS ON WORK EXPERIENCE**

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

#### **5.51 ONE-TO-ONE TEACHING, EXTENDED SCHOOL AND OFF-SITE-ARRANGEMENTS**

- 5.51.4 Where staff are engaged in 1:1 teaching or coaching with students, for example, being coached for a presentation in assembly or sports day event, or receiving additional support with their studies, staff must ensure that a senior leader is aware of the 1:1 work and at all times, 1:1 discussion with students should most appropriately take place in rooms which are openly visible to other members of staff.
- 5.51.5 If other organisations provide services or activities on the site, it is the responsibility of the Campus Principal to check that they have appropriate procedures in place, including compliance with safer recruitment procedures.
- 5.51.6 It is the responsibility of the Campus Principal to check the appropriateness of any visitor to the school (e.g. by open source internet searches).

5.51.7 When students attend off-site activities, including day visits and work-related activities, the Campus Principal will ensure that effective child protection arrangements are in place. In the case of such alternative provision the Campus should obtain written confirmation that the appropriate safeguarding checks have been conducted.

## **5.52 VIDEO CONFERENCING AND OFF-SITE ARRANGEMENTS**

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

## **5.53 IMAGES AND PHOTOGRAPHY**

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

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

5.53.5 It would be normal practice to demonstrate Campus life by way of photographs and video. If teachers, staff, Trustees or members of the Local Governing Board (LGB) or visitors have any concerns about themselves being in photographs associated with the school they should bring that to the attention of the Campus Principal.

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

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

5.53.8 A common-sense approach to the taking, sharing and posting of photographs of children whilst at school by their family and friends is requested. An appreciation of the risks is important. It is not acceptable for family and friends to take photographs for anything other than personal use. Any abuse of this approach will mean the circumstances being reviewed and may result in more restrictive measures in school.

## **5.54 VISITORS TO THE CAMPUS**

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

## **5.55 SITE SECURITY**

- 5.55.4 The Campus Security & Visitor Policy and procedures will be followed. Visitors to the Campus are asked to sign in and are given a badge, which confirms they have permission to be on site. Red lanyards denote a lack of appropriate checks for the role they are performing at campus and those individuals must be accompanied at all times i.e. contractors. Green lanyards denote those who are security cleared such as staff.
- 5.55.5 OneSchool Global Head Office staff will wear identification badges in the same green and red colours, which have the same meaning. The Campus Principal may contact the OSG UK Head Office at any time to verify the credentials of a visitor from the Head Office
- 5.55.6 All visitors are expected to observe the Campus' safeguarding and health and safety requirements to ensure children in Campus are kept safe.
- 5.55.7 The Campus Principal will ensure supervision is in place for any visitor that does not have the appropriate checks
- 5.55.8 The Campus will comply with the CCTV Policy in line with the GDPR 2018 and supporting policy.

## **5.56 USE OF CAMPUS PREMISES FOR NON SCHOOL ACTIVITIES**

- 5.56.4 Where a campus hires out or rents out facilities or premises to organisations or individuals, it is the responsibility of the Campus Principal and CA team to ensure that appropriate arrangements are in place to keep children safe.
- 5.56.5 When the services or activities are provided by the proprietor under the direct supervision or management of the campus staff, the campuses child protection arrangements will apply.
- 5.56.6 Where services or activities are provided separately by another body this will not be the case. The proprietor must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place. (This includes inspecting these) Also to ensure that there are arrangements in place to liaise with the campus on these matters where appropriate.
- 5.56.7 The proprietor will also ensure that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement) as a

condition of use and occupation of the premises, and failure to comply with this will lead to termination of the agreement.

- 5.56.8 The campus will review all hires of the school facilities for non school activities in line with the relevant guidance, [Keeping children safe in out-of-school settings - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/keeping-children-safe-in-out-of-school-settings)

## 5.57 SAFEGUARDING AND CHILD PROTECTION IN EXAMINATIONS

### Personnel:

- 5.57.4 All invigilators and support personnel will be appropriately checked in line with Safer Recruitment guidance as set out Safer Recruitment Policy and the Campus Safeguarding and Child Protection Policy.
- 5.57.5 The staff being used for invigilation will be detailed on the Campus SCR and evidence of all safer recruitment checks stored appropriately in line with the relevant guidance.

### Supervision:

- 5.57.6 There will be occasions where students with access arrangements may be required to work one to one, these incidents may involve
- Readers
  - Scribes
  - Additional Time
- 5.57.7 In each of these incidents where an invigilator is working one to one, in line with the JCQ requirements, see ICE paragraph 13 the campus must have a 'roving invigilator' conducting regular checks on the rooms and students.
- 5.57.8 The rooms used for one-to-one support, must aim to achieve the following:
- Be in clear sight / visibility of others
  - Be in a room with a window and or glass pane in the door to enable the room to be clearly seen into
  - Have CCTV available

### Training:

- 5.57.9 All invigilators would receive training with the Campus DSL to enable them to spot signs of harm and know how to report and disclose concerns
- 5.57.10 All invigilators should have the Campus Staff code of conduct shared with them so they are clear of the expectations of appropriate behaviour

## 6 GUIDELINES



### Online documents:

Keeping Children Safe in Education (KCSIE)

[Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Working together to safeguard children (WTSC)

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Prevent Duty Guidance: For England and Wales

<https://www.gov.uk/government/publications/prevent-duty-guidance>

The Use of Social Media for Online Radicalisation

<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>

DFE Guidance for Local Authorities on Elective Home Education

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/791527/Elective\\_home\\_education\\_guidance\\_for\\_LAv2.0.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/791527/Elective_home_education_guidance_for_LAv2.0.pdf)

## 7 LEGISLATION

- Keeping Children Safe in Education 2023
- Children and Families Act 2014
- Childcare Act 2006
- Counter-Terrorism and Security Act 2015
- Protection of Freedoms Act 2012
- Education Act 2011
- Children and Young Persons Act 2008
- Education and Inspections Act 2006
- Safeguarding Vulnerable Groups Act 2006
- Education (Independent Schools Standards) (England) Regulations 2014
- Education (Provision of Information by Independent Schools) (England) Regulations 2010
- GDPR 2018
- Children Act 1989

### Guidance both statutory and non-statutory

- Advice on drugs in schools – 2012
- Child Sexual Exploitation; definition and guide for practitioners - Feb 2017
- Contextual safeguarding – University of Bedfordshire – 2018
- Data protection: toolkit for schools 2018
- DfE Children Missing in Education - September 2016
- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers - July 2018
- Mental health and behavior in schools 2018
- National Police Chief's Council: When to call the police 2020
- Preventing and tackling bullying – July 2017

- Prevent Duty Guidance: for England and Wales 2015
- Relationships education, relationships and sex education (RSE) and health education 2020
- Safeguarding children in whom illness is fabricated or induced – 2008
- Sexual harassment between children May 2018
- School security advice – 2012
- UKCCIS (2016) 'Sexting in Schools and Colleges' - Responding to incidents and safeguarding young people'
- Use of force within schools – July 2013
- What to do if you're worried a child is being abused – Advice for practitioners - March 2015
- Working Together to Safeguard Children – December 2023

### Additional guidance and information

- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018).
- NSPCC Website Link: <http://www.nspcc.org.uk/>
- NSPCC website link to Preventing Abuse: <http://www.nspcc.org.uk/preventing-abuse/>
- CEOPs Thinkuknow programme – Keeping children safe on-line and protecting them from sexual abuse and exploitation. <https://www.thinkuknow.co.uk/Teachers/>
- Safenetwork website jointly managed by the NSPCC and Children England  
<http://www.safenetwork.org.uk/Pages/default.aspx>

## 8 ATTACHMENTS

Appendix 1	Further Information on Signs of Abuse
Appendix 2	OSGUK Training Strategy
Appendix 3	Working Together to Safeguard Children December 2023
Appendix 4	DSL Job Description
Appendix 5	A – Display Notice - Safeguarding Display Posters B – Display Notice – Safeguarding Local Arrangements C – Display Notice – Safeguarding Contacts Posts
Appendix 6	Child-on-child sexual abuse: what to do if a child makes a disclosure Poster
Appendix 7	Prevent Risk Assessment Template
Appendix 8	Training Log Template

### VERSION CONTROL

Policy Code	Date	Version No.	Nature of Change
<b>QSC/24</b>	September 2020	8	
	January 2021	9	Removal of EEA checks due to Brexit
	September 2021	10	Who is this guidance for, now clearly states it is also for <b>Senior leadership teams</b> , a section of the CP policy has been added to show the responsibility of SLT's.

			<p>All staff should read KCSIE alongside the Sexual violence and sexual harassment advice.</p> <p>Significant new section on low level concerns against adults</p> <p>Significant new section on child on child abuse (Child on Child) around sexual violence and harassment</p> <p>Greater emphasis on the board as proprietors</p> <p>Introduced annex A for staff that don't work directly with children to read</p> <p>Online Safety added 4<sup>th</sup> C (Content, Contact, Conduct, <b>Commerce</b>)</p> <p>Added section about use of school remises for non-school activities</p> <p>Added section on elective home education</p> <p>Added updated UKCIS 2020 guidance</p> <p>Updated DSL Job description added information on information sharing</p>
<b>QSC/24</b>	September 2021	10.1	Minor updates to reflect changes in the published ISI commentary
<b>QSC/24</b>	November 2021	10.2	<p>Strengthen reporting arrangements to DBS and TRA where required.</p> <p>Additional sections on:</p> <ul style="list-style-type: none"> <li>• Child abduction and community safety incidents</li> <li>• Children and the court system</li> <li>• Children with family members in prison</li> <li>• Cybercrime</li> </ul> <p>Added more detail to the DSL job description and person specification around Channel and Prevent.</p> <p>Also added to the duties of staff in the training programme appendix 2</p> <p>Strengthened the section around COVID-19 cover during the pandemic</p>
<b>QSC/24</b>	November 2021	10.3	<p>Added procedures to minimise Child on Child abuse and strengthened section around support for victims, perpetrators and any others affected.</p> <p>Strengthened section about responding to low level concerns</p>
	November 2021	10.4	Added section 5.64 on safeguarding and child protection in examinations
<b>QSC/24</b>	February 2022	10.5	Added in section 5.56 to add in Modern Day Slavery and National Referral Mechanism
<b>QSC/24</b>	May 2022	10.6	<p>4.7.1 Named the Lead / designated governor for Safeguarding and the National Professional lead for Safeguarding.</p> <p>4.7.9 Added training requirements for the DSL and Deputies</p> <p>4.8 Added to induction the need for new staff to be informed of the low-level concerns procedure.</p> <p>5.3 Added to the flowchart that referrals to statutory agencies does not require consent.</p> <p>5.15.6 Added that with child-on-child cases that girls are more likely to be victim and boys perpetrators.</p>

<b>QSC/24</b>	June 2022	10.7	5.7.14 Added in that the rationale for all decisions and actions taken must be recorded.
<b>QSC/24</b>	September 2022	11	<p>Amended all references of Peer-on-Peer Abuse to Child-on-Child Abuse</p> <p>Amended and updated the definition of abuse</p> <p>Amended definition of Domestic Abuse</p> <p>Added in requirements around governance and proprietor training around Safeguarding taking place at least annually</p> <p>Added in additional responsibilities of the Campus Principal and District Principal, around holding to account the DSL as well as conducting reviews around lessons learned.</p> <p>Contact Details, added details of the Designated Senior Mental Health Lead</p> <p>Added additional line as responsibility for Campus Principal to consider support for students with protected characteristics</p> <p>Added in named DSMHL</p> <p>Added in Human Rights Act Articles 3,8,14, protocol 1 of article 2</p> <p>Added in HRA</p> <p>Added 'humiliating pupils' as an example of a low-level concern</p> <p>Added in the role of the trust and proprietors to ensure that there is no discrimination in the school based on protected characteristics</p> <p>Added in that the school MUST see the policies and procedures for Safeguarding when the campus is being used for non-school activities</p> <p>Child on Child Sexual Violence and Sexual Harassment has been re written and reordered</p> <p>Updated SEND section of the policy and added an additional bullet point</p> <p>Appendix 4: Updated the DSL Job Description</p>
<b>QSC/24</b>	January 2023	11.1	Updated Prevent Guidance

<b>QSC/24</b>	December 2022	11.2	Added Prevent Risk Assessment Tool as appendix 7
<b>QSC/24</b>	September 2023	12	Added additional paragraph on Filtering & Monitoring  Updated terminology around children missing and absent from school
<b>QSC/24</b>	January 2024	12.1	Updated to Working together to safeguard Children December 2023, replacing July 2018 version  Amended language in PREVENT section to replace vulnerable to those that may be susceptible to  Updated PREVENT guidance to December 2023  Updated PREVENT risk assessment, appendix 7  Removal of the role DP, no longer exists

## Appendix 1: FURTHER INFORMATION ON SIGNS OF ABUSE

### PHYSICAL ABUSE

Physical signs	Behavioural signs
<p>Unexplained bruises and welts on the face, throat, arms buttocks thighs or lower back in unusual patterns or shapes which suggests the use of an instrument</p> <p>Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks</p> <p>Scald marks –immersion burns produce ‘stocking’ or ‘glove’ marks on feet and hands or upward splash marks which may suggest hot water has been thrown over a child</p> <p>Human bite marks</p> <p>Broken bones</p>	<p>Behavioural extremes (withdrawal, aggression or depression)</p> <p>Unbelievable or inconsistent explanations of injuries</p> <p>Fear of parents being contacted</p> <p>Flinching when approached or touched</p> <p>Truancy or running away from home</p>

## EMOTIONAL ABUSE

Physical signs	Behavioural signs
Eating disorders, including obesity or anorexia Speech disorders (stammering) Nervous disorders (rashes, hives, facial tics, stomach aches)	Fear of parent being approached Fear of making mistakes Developmental delay in terms of emotional progress Cruel behaviour towards children, adults or animals Self-harm Behavioural extremes, such as overly compliant-demanding, withdrawn-aggressive, listless-excitabile

## SEXUAL ABUSE

Physical signs	Behavioural signs
Torn, stained or bloody underclothes Pain or itching in genital area Bruises or bleeding near genital area or anus Sexually transmitted infections Pregnancy Discomfort when walking or sitting down	Self-harm Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level Sudden or unexplained changes in behaviour Avoidance of undressing or wearing extra layers of clothing Truancy Regressive behaviours (bed-wetting or fear of dark)

## NEGLECT

Physical signs	Behavioural signs
Height and weight significantly below age level Poor hygiene (lice, body odour etc) Inappropriate clothing for weather conditions Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) Constant hunger, sometimes stealing food from others	Erratic attendance at school Chronic hunger or tiredness Having few friends Assuming adult responsibilities

## CHILD SEXUAL EXPLOITATION

Physical signs	Behavioural signs
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Tiredness or mood swings Bruising Sexually transmitted diseases Pregnancy	Sudden decline in school performance, punctuality, attendance In possession of expensive goods Going to place they cannot afford Age-inappropriate clothing Inappropriate sexualised behaviour Secretive Mixing with older people Misuse of drugs and alcohol
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### CHILD CRIMINAL EXPLOITATION AND COUNTY LINES

Physical signs	Behavioural signs
See sections on physical and sexual abuse Carrying weapons	Self-harming Persistently going missing from school or home and/or being found out of area Unexplained acquisition of money, clothes or mobile phones Excessive receipt of texts/phone calls and/or having multiple handsets Relationships with controlling older individuals or groups Significant decline in school performance Gang association or isolation from peers or social networks

### FEMALE GENITAL MUTILATION

Physical signs	Behavioural signs
Difficulty walking, sitting or standing Bladder or menstrual problems Severe pain and bleeding Infections such as tetanus, HIV and hepatitis B and C	Abroad for a prolonged period Unusual behaviour after a period of absence May talk of a 'special procedure' or 'special occasion to become a woman' Spending longer periods in the bathroom Reluctance to undergo normal medical examinations

### FORCED MARRIAGE



Physical signs	Behavioural signs
Cut or shaved hair as a form of punishment for being disobedient	<p>Absence from School</p> <p>Failure to return from visit to country of origin</p> <p>Self-harm or attempted suicide</p> <p>Running away from home</p> <p>Early marriage of siblings</p> <p>Sudden announcement of engagement to a stranger</p> <p>May talk of a 'special procedure' or 'special occasion to become a woman'</p> <p>Spending longer periods in the bathroom</p> <p>Reluctance to undergo normal medical examinations</p>

### GROOMING

Physical signs	Behavioural signs
See section on sexual abuse	<p>Spending increasingly prolonged time online</p> <p>Having older boyfriends or girlfriends</p> <p>Secretiveness about who they are talking to online and what sites they visit</p> <p>Possession of electronic devices such as mobile phones or webcams that parents have not provided</p> <p>Engaging less with their usual friends</p> <p>Using sexual language that you would not expect them to know</p> <p>Going to unusual places to meet people</p> <p>Using drugs and/or alcohol</p> <p>Going missing from home or school</p>

### RADICALISATION

Physical signs	Behavioural signs
out of character changes in dress, behaviour and peer relationships	<p>Showing sympathy for extremist causes</p> <p>Glorifying violence</p> <p>Evidence of possessing illegal or extremist literature</p> <p>A sudden disrespectful attitude towards others</p> <p>Increased secretiveness, especially in relation to internet use</p> <p>Unwillingness or inability to discuss their views</p>

	Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League
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## CHILD ABDUCTION AND COMMUNITY SAFETY 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 in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

## 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 and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the 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. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

## 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.

The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## CYBER CRIME

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

Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently

cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

**Broad government guidance on the following is also available via the GOV.UK website**

[bullying including cyberbullying](#)

[children missing education](#)

[child missing from home or care](#)

[child sexual exploitation](#)

[domestic violence](#)

[drugs](#)

[fabricated or induced illness](#)

[faith abuse](#)

[female genital mutilation \(FGM\)](#)

[gangs and youth violence](#)

[gender-based violence/violence against women and girls \(VAWG\)](#)

[hate](#)

[mental health](#)

[missing children and adults](#)

[private fostering](#)

[preventing radicalisation](#)

[relationship abuse](#)

[sexting](#)

[trafficking](#)

## Appendix 2: OneSchool Global UK Training Strategy

### 1. Introduction

1.1. The OneSchool Global UK (OSG UK) Safeguarding Statement is;

**“We will do all we can to offer the safest place for children to learn, become life-ready, and reach their full potential in society”**

1.2. The OSG UK Safeguarding Strategy provides a framework in which we will organisationally approach safeguarding. In order to deliver effective safeguarding practice, it is recognised that all our staff, trustees and volunteers need to have up-to-date role specific training and awareness. There is a need for annual updates and refresher training not only because guidance suggests that is necessary but more importantly the outcome is a stronger safeguarding practice.

1.3. OSG UK supports the standards and the premise that by organisations and agencies working together, children can be effectively safeguarded. This is most effective when there is;

- A shared understanding of roles and responsibilities
- Improved communication between professionals and those working with children
- Effective working together based on sound working relationships
- Improved assessment and decision making

1.4. In order to support effective multi-agency working, OSG UK recognises and endorses that key training is delivered at a local level via a Local Authority (LA). This is particularly relevant for Designated Safeguarding Leads (DSL), Campus Principals and Safeguarding CA's

## 2. The Suite of Training Options

2.1. OSG UK will support a range of training and awareness options including;

- Online training, currently provided by Flick Learning for OSG UK
- Face-to-face training through a relevant LA
- Bespoke one-off training to address a particular need or issue. There are a number of providers that supply child protection training, i.e. the NSPCC
- Annual updates for all staff/trustees/volunteers delivered by the DSL as part of their role and responsibility.

2.2. When undertaking initial or refresher training it is important to consider the 5 Rs to ensure that awareness and delivery fulfils the necessary aspects required from training:

- a) Recognising child abuse
- b) Responding to children
- c) Reporting concerns – about adults and children
- d) Recording information

- e) Making Referrals to children's social care

### 3. Who Requires Training?

3.1. In effect it is all those who work with children directly or indirectly whether on a paid or voluntary basis. Training should be targeted at the following groups:

- Those with particular and specialised responsibility for safeguarding children such as designated or named professionals, those undertaking Section 47 enquiries or working with complex cases. This is likely to be our DSL cohort, Campus Principals and Safeguarding Trustees/CAs.
- Those who work regularly with children and young people who may be asked to contribute to assessments of children in need. These are predominately our teaching staff.
- Those with some contact with children and young people. These may be people who operate in an environment where they see children but do not have case responsibility for them. This is going to be the majority of our staff either on a paid or voluntary basis.

### 4. Training Frequency

4.1. Keeping Children Safe in Education (KCSIE) recommends that in a school the Designated Safeguarding Lead (DSL) and any deputies undergo refresher training, to provide them with the knowledge and skills required to carry out the role every two years. This is best completed through the Local Authority. OSG UK supports this approach.

4.2. All staff should undergo safeguarding and Child Protection (CP) training at induction with an expectation that learning and professional development in this area continues through e-learning over the next three months.

4.3. All staff should receive regular safeguarding and child protection updates as required. For OSG UK the focal point in any given campus should be the DSL who should do regular updates at Inset days at least annually. This will be supported by email updates, bulletins etc. from the National Support Office (NSO), LA, NSPCC etc.

### 5. Specific Training/Awareness Requirements

5.1. Nothing within this strategy prevents bespoke training based on need either at a local or national level. Training must always be considered within the context of the overall added value, cost and impact on the workplace.

5.2. Whilst training will be consistent with the requirements of KCSIE the suggested framework for training to role is:

5.3. **Campus Principals**

To include the Behaviour Policy (BP) to ensure that there is no tension between SEND and safeguarding practice. In practice this will be delivered by a Regional Principal and Lead Campus Administrator (LCA).

- a) Induction to include campus approach to safeguarding as well as values and ethos.
- b) Safer Recruitment – Via FLICK
- c) Flick Online Safeguarding Level 2
- d) Annual update/awareness via the DSL
- e) DSL Training via the LA
- f) Read and understood KCSIE Guidance and the Campus CP Policy
- g) Flick Online Prevention of Radicalisation Training
- h) Flick Online Health and Safety for Managers Training
- i) Flick Online Fire Safety for Managers
- j) Flick Online Child Sexual Exploitation Training
- k) Flick Online Domestic Abuse Training
- l) Flick Online Data Protection Training
- m) Flick Online Mental Health and Young People Training
- n) Flick Online Modern Slavery & Trafficking Training
- o) Flick Online Information Security Training
- p) Flick Online Listening Skills Training
- q) Flick Online Lone Worker for Managers Training
- r) Flick Online Forced Marriage Training
- s) Flick Online Female Genital Mutilation Training
- t) Flick Equality and Diversity for Managers Training

5.4. **Designated Safeguarding Leads**

- a) Induction to include campus approach to safeguarding as well as values and ethos. To include the Behaviour Policy to ensure that there is no tension between SEND and safeguarding practice
- b) Flick Online Child Safeguarding Level 2
- c) Safer Recruitment – Via FLICK
- d) E-safety through Via FLICK
- e) DSL training via the LA
- f) Read and understood KCSIE Guidance and the Campus CP Policy
- g) Flick Online Health and Safety Training
- h) Flick Online Child Sexual Exploitation Training
- i) Flick Online Domestic Abuse Training
- j) Flick Online Equality and Diversity Training
- k) Flick Online Female Genital Mutilation Training
- l) Flick Online Fire Safety Training
- m) Flick Online Forced Marriage Awareness Training
- n) Flick Online Information Security Training
- o) Flick Online Modern Slavery and Human Trafficking Training
- p) Flick Online Data Protection Training
- q) Flick Online Listening Skills Training
- r) Flick Mental Health and Young People Training
- s) Flick Prevent of Radicalisation Training
- t) Flick Lone Worker Training

5.5. **Newly Qualified Teachers (NQT)**

- a) Induction to include campus approach to safeguarding as well as values and ethos. To include the Behaviour Policy to ensure that there is no tension between SEND and safeguarding practice
- b) Flick Online Child Safeguarding Level 1
- c) Flick Online E-safety Training
- d) Flick Online Prevent of Radicalisation Training
- e) Read and understood KCSIE Guidance and the Campus CP Policy



- f) Flick Online Health and Safety Training
- g) Flick Online Child Sexual Exploitation Training
- h) Flick Online Domestic Abuse Training
- i) Flick Mental Health and Young People Training
- j) Flick Online Data Protection Training
- k) Flick Online Equality and Diversity Training
- l) Flick Online Fire Safety Training
- m) Flick Online Information Security Training
- n) Flick Online Listening Skills Training
- o) Flick Lone Worker Training
- p) Flick Safe Lifting of Children Training (*if required for role*)

#### 5.6. **Teaching Staff**

- a) Induction to include campus approach to safeguarding as well as values and ethos. To include the Behaviour Policy to ensure that there is no tension between SEND and safeguarding practice
- b) Flick Online Child Safeguarding Level 1
- c) Flick Online E-safety Training
- d) Annual update/awareness via the DSL
- e) Flick Online Prevent of Radicalisation Training
- f) Read and understood KCSIE Guidance and the Campus CP Policy
- g) Flick Online Health and Safety Training
- h) Flick Online Child Sexual Exploitation Training
- i) Flick Online Data Protection Training
- j) Flick Online Domestic Abuse Training
- k) Flick Online Equality and Diversity Training
- l) Flick Online Information Security Training
- m) Flick Online Listening Skills Training
- n) Flick Lone Worker Training

- o) Flick Mental Health and Young People Training
- p) Flick Safe Lifting of Children Training (*if required for role*)

#### 5.7. **Paid Staff (Agency)**

- a) Induction to include campus approach to safeguarding as well as values and ethos. To include the Behaviour Policy to ensure that there is no tension between SEND and safeguarding practice
- b) Flick Online Data Protection Training (*completed by long term agency staff*)
- c) Flick Online E-safety Training (*completed by long term agency staff*)
- d) Annual update/awareness via the DSL
- e) Flick Online Prevent of Radicalisation Training (*completed by long term agency staff*)
- f) Read and understood KCSIE (Part 1) and the Campus CP Policy
- g) Flick Online Health and Safety Training (*completed by long term agency staff*)
- h) Flick Online Child Sexual Exploitation Training (*completed by long term agency staff*)
- i) Flick Online Domestic Abuse Training (*completed by long term agency staff*)
- j) Flick Mental Health and Young People Training (*completed by long term agency staff*)

#### 5.8. **Volunteers**

- a) Induction to include campus approach to safeguarding. To include the behaviour policy to ensure that there is no tension between SEND and safeguarding practice. DSL led.
- b) Annual Safeguarding Training and KCSIE Quiz to demonstrate understanding
- c) Read and understood KCSIE (Part 1) and the Campus Safeguarding and Child Protection Policy
- d) Flick Online Prevent of Radicalisation Training (*for SDMs only*)
- e) Flick Online E Safety (For SDM's Only)

#### 5.9. **Safeguarding CA**

- a) Induction to include campus approach to safeguarding. To include the behaviour policy to ensure that there is no tension between SEND and safeguarding practice. Campus Principal led.
- b) DSL Training via the LSP
- c) Flick Online Prevent of Radicalisation Training
- d) Read and understood KCSIE Guidance and the Campus CP Policy
- e) Annual update/awareness by the DSL
- f) Flick Online Information Security Training
- g) Flick Online Equality and Diversity Training
- h) Safer Recruitment – Via FLICK Online
- i) Flick Online Data Protection Training
- j) Flick E Safety

#### 5.10. **CA Team**

- a) Induction to include campus approach to safeguarding. To include the Behaviour Policy to ensure that there is no tension between SEND and safeguarding practice
- b) Safer-recruitment – Via Flick Online
- d) Annual update/awareness via the DSL
- e) Read and understood KCSIE Guidance and the Campus CP Policy
- f) Flick Online Equality and Diversity Training
- g) Flick Online Health and Safety for Managers Training (*For H&S CA only*)
- h) Flick Online Fire Safety for Managers Training (*For H&S CA only*)
- i) Flick Online Data Protection Training
- j) Flick Online Information Security Training
- k) Flick Online Prevent of Radicalisation Training
- l) Safer Recruitment – Via FLICK
- J) Flick E Safety

## 6. Record Keeping

- 6.1. It is important that the campus maintains a singular log of training/awareness undertaken by all staff including trustees and volunteers. This allows for a clear picture of the training landscape, which will help identify local need and ensure timeliness of refresher training.
- 6.2. This log is separate from any attendance record taken at the time for a singular event.
- 6.3. One advantage of using Flick is that a central training record is maintained for all those who have used this online tool. It is for campuses to ensure that a member of staff has administration access rights to Flick in order to monitor individual school take-up.
- 6.4. It would be beneficial if the DSL maintained a separate record of any communication or update sent during the course of the year either internally or to the wider school family. This will be particularly helpful for evidencing the whole school approach during any subsequent inspection.

## Appendix 4: JOB DESCRIPTION & PERSON SPECIFICATION (2023)

### Designated Safeguarding Lead / Deputy Designated Safeguarding Lead

#### Job Description

#### JOB PURPOSE

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the campus leadership team, is appointed to the role of designated safeguarding lead.

The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)

This should be explicit in the role holder's job description. This appendix will be printed, and signed by the DSL and DDSs to go in their personnel file.

The designated safeguarding lead should have the appropriate status and authority within the campus to carry out the duties of the post.

The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively.

Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children

### **Deputy designated safeguarding leads**

The school will ensure there is a minimum of one Deputy DSL.

All deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description.

The same job description will apply to Deputies as well as DSL's

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.

## **DUTIES**

### **Availability**

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours 8am – 4pm) for staff in the school to discuss any safeguarding concerns.

Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, or via their OSG provided mobile.

### **Manage referrals**

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - [When to Call the Police](#) should help understand when to consider calling the police and what to expect when working with the police.

### **Working With Others**

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- This should include being aware of the requirement for children to have an Appropriate Adult.
- Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the “case manager” (as per Part four of KCSIE) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCO's), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.
- This includes:
- ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

### **Raising Awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

### **Training, knowledge, and skills**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role.

This training should be updated at least every two years and should take place with the Local safeguarding partners

The designated safeguarding lead (and any deputies) should undertake Prevent awareness training every two years

Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the campus, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the campus with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with staying safe online
- obtain access to resources and attend any relevant or refresher training courses, and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the campus may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Providing Support to Staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

ensure that staff are supported during the referrals processes, and  
support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### **Understanding the views of children**

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:



encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the campus may put in place to protect them, and, understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

### **Information sharing and managing the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.
- They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE.
- Where children leave the campus (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives

### **Reporting To**

- Reporting to Campus Principal and Associate Principal for Safeguarding
- Safeguarding CA

**SUPPORT FOR THE ROLE**

The role is supported on occasion by the RSO and the CP

OneSchool Global UK provides a range of support services in areas such as ICT, recruitment, HR, policies, resources and compliance.

**Employee Signature:**

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**Line Manager Signature:**

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**Date:**

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ISSUED BY

OneSchool Global UK

Issue date: September 2023

**JOB TITLE**
**Person Specification**

Specification	Essential	Desirable
<b>Experience and Knowledge</b>	<ul style="list-style-type: none"> <li>Up to date DSL training, dated within 2 years provided by the campuses LSP</li> <li>Member of the Senior Leadership Team</li> </ul>	
<b>Education and Qualifications</b>	<ul style="list-style-type: none"> <li>Appropriate teaching qualification, or equivalent qualification, appropriate to role in school and to the role of DSL.</li> <li>Safer Recruitment trained</li> <li>E-Safety trained, in a course that is recognized by the local safeguarding authority where the school is based</li> <li>Trained in the PREVENT Duty</li> </ul>	
<b>Skills and Abilities</b>	<ul style="list-style-type: none"> <li>Good communication skills written and verbal</li> <li>Good organisational skills</li> <li>Good record keeping skills</li> <li>A positive role model of professional practice and conduct of others</li> <li>Able to communicate with a range of stakeholders with calmness, reflection and professionalism</li> </ul>	
<b>Training</b>	<ul style="list-style-type: none"> <li>Willingness to undertake relevant training to the role, ongoing, and identify own development needs</li> <li>Committed to ongoing CPD and Professional development</li> </ul>	
<b>Attributes and Attitudes</b>	<ul style="list-style-type: none"> <li>Flexible approach and positive attitude towards work</li> <li>Punctual and reliable</li> <li>Ability to adapt to changes in the workplace</li> <li>Ability to remain focused and calm even with dealing with challenging and complex circumstances, some of which will be upsetting</li> <li>Ability to work as part of a team</li> <li>Ability to reflect on decisions and next steps, with the premise of 'what if I'm right'</li> </ul>	
<b>Equality, diversity and inclusion</b>	<ul style="list-style-type: none"> <li>Knowledge, understanding and commitment to equality, diversity and inclusion informed by practical experience and application</li> </ul>	
<b>Safeguarding</b>	<ul style="list-style-type: none"> <li>Knowledge, understanding and commitment to safeguarding and promoting the welfare of students</li> <li>Ability to form and maintain appropriate relationships and personal boundaries with students</li> </ul>	

The post holder will be required to complete an enhanced Disclosure Barring Service (DBS) Check with appropriate barred list checks, or the equivalent, and must be eligible to work in the UK.

OneSchool Global UK is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment.

All staff are expected to be committed to the Equal Opportunities Policy.

## APPENDIX 8: SAFEGUARDING TRAINING LOG

Date	Training Topic	Attendees	Evidence of attendance
<i>E.g. September 4<sup>th</sup></i>	<i>Annual Safeguarding Update</i>	<i>All Staff and Governance Members</i>	<i>KCSIE Quiz &amp; Attendance Record</i>