Windsor Academy Trust

Manor Way Primary Academy

Child Protection and Safeguarding Policy	
Responsible Committee:	Board of Directors
Date revised by Board of Directors:	13 July 2023
Date to be implemented:	1 September 2023
Next review date:	July 2024

Safeguarding and Child Protection
Policy Statement

1.1 Windsor Academy Trust (WAT) is committed to safeguarding and promoting the welfare of all pupils by protecting children from maltreatment, preventing the impairment of health or development and by ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

1.2 WAT is committed to meeting its moral and statutory responsibility, ensuring that robust procedures are in place, outlining the actions that it will take to prevent harm, to promote well-being, to create safe environments and to respond to specific issues and vulnerabilities. Safeguarding determines the actions taken to keep children safe and protect them from harm in all aspects of their school life to ensure that they have the best outcomes. This is underpinned by a culture of openness where both children and adults feel secure, able to talk, and believe that they are being listened to.

1.3 WAT maintains an attitude of 'it could happen here' and expects that all staff and volunteers share and demonstrate their commitment to protecting children, including demonstrating professional curiosity at all times. All Academies are required to maintain a single central record to provide reassurance that all staff and volunteers are recruited safely.

1.4 WAT is committed to the following safeguarding key principles:-

- Responsibility to safeguard and promote the welfare of children is of paramount importance.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff, volunteers, Local Advisory Body (LAB) Members and Directors must share this commitment.
- All staff, volunteers, LAB Members and Directors have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in an Academy.
- When concerned about the welfare of a child, staff members are to always act in the interests of the child.
- Where there is a safeguarding concern, schools will ensure that the child's wishes and feelings are taken into account. Children will be clear about the ways they can report abuse and that their concerns will always be taken seriously
- We commit to a whole school approach to safeguarding.
- Students and staff involved in child protection issues will receive appropriate training and support.

1.5 WAT expects that each Academy will follow the guidance and child protection procedures provided by their Local Safeguarding Children Board and Local Authority Children's Services departments. Crucially, there may be safeguarding issues that are specific to their local area and communities.

1.6 This policy outlining the local procedures for each of the Academies across the Trust will be made available on the Academy websites. They have been developed to ensure compliance with legislation including Section 175 the Education Act 2002, Section 11 of the Children's Act 2004, Working Together to Safeguard Children July 2018 (updated in December 2020), Keeping Children Safe in Education September 2022 (here) and What to do if you are worried about a child being abused – advice for practitioners. All Academies are expected to follow the escalation policy if they have concerns about the management of a case by Children and Social Care.

1.7 Child Protection and Safeguarding policy works in conjunction with other relevant policies in place at both Trust and at a local level, safeguarding the interests and welfare of children e.g. recruitment and selection, anti-bullying, confidential reporting (whistle blowing), health and safety, special education needs and disabilities, equality policy and staff code of conduct.

1.8 WAT has the following roles and responsibilities in place to ensure that all Academies are compliant and have a strong safeguarding culture:

Roles	Responsibilities
Designated Director for Safeguarding (DDS)	A Trust Board member who has an oversight of Trust-wide safeguarding and reports directly to the Board.
Strategic Lead for Safeguarding (SLS)	A member of the executive team who has an oversight of Trust-wide safeguarding and leads on the development of the WAT safeguarding policy.
WAT Designated Safeguarding Lead	A lead DSL who takes responsibility for peer audits, the DSL peer network and who liaises closely with the DDS and SLS.
Designated Safeguarding Governor (DSG)	A member of the Local Advisory Body who has an oversight of safeguarding in their individual Academy and reports back to the LAB. They also have the DDS as point of contact to the Board.
Designated Safeguarding Lead/s (DSL)	Member/s of staff responsible for safeguarding and child protection within their individual Academy. They liaise closely with key stakeholders, such as their staff, Headteacher, DSG and relevant external agencies.

2. Governance

2.1 WAT's Designated Director (DDS) oversees the governance arrangements for Safeguarding and is a point of contact for the Local Advisory Board's Designated Safeguarding Governors (DSG).

2.2 The WAT Designated Director meets with the WAT DSL and the WAT Strategic Lead for Safeguarding at the end of each term to evaluate the outcomes of scheduled audits and checks. The WAT Director reports a summary of findings at the full Board meeting.

2.3 All Academies are required to follow the Local Safeguarding Children Board's interagency policies and procedures and the Local Advisory Body (LAB) are responsible for the implementation of the Safeguarding and Child Protection Policy at Academy level. Safeguarding will be included on the agenda and monitored at every full Local Advisory Body meeting.

2.4 Each Local Advisory Body is required to have a DSG to provide feedback at LAB meetings. The DSG meets regularly with the Academy's Designated Safeguarding Lead (DSL) to discuss:

- Safeguarding peer audits or external reviews
- Risks/vulnerabilities
- Compliance issues
- The effectiveness in the application of practices
- Any lessons that can be shared and
- Best practice.

3. The Supporting Structural and Quality Assurance Arrangements

Focus	Process
Quality Assurance	Each Academy has two peer audit visits per year carried out by the WAT DSL or other WAT DSLs. These reviews will be quality assured by the WAT SLS. Each Academy has a safeguarding check by an external expert. (*The frequency of the check will depend on each school's circumstances. For example, a good school with no safeguarding concerns will have an external check every four years. If concerns are raised about safeguarding, or a school is not judged to be good, then more regular external checks will take place).* If serious concerns are raised in peer audits or external checks, they will be shared immediately with the SLS, who will inform the DDS and the executive team.
Strategic oversight and connection with the Trust Board	The Designated Director meets with the SLS and the WAT DSL on a termly basis to evaluate findings from audits and checks and to monitor LAB meeting minutes. Findings will be reported back to the full Board.
LABs	LAB DSG meets with DSL in school on a termly basis **and/or** is part of the audits/checks. DSG can contact the Designated Director if they have concerns in relation to safeguarding in their individual Academy. Safeguarding a standing agenda item to be discussed at each LAB meeting.
Peer support and collaboration	Half-termly meetings led by the WAT DSL for Academy DSLs (see 3.1).
Other duties (including statutory)	The WAT safeguarding policy reviewed and updated annually or as and when required. HR carry out SCR checks at regular intervals.

3.1 The DSLs across WAT meet and network on a half-termly basis, to pool expertise, knowledge and experience in the development and application of policies and procedures, to share good practice and to develop and embed best practice. This ensures that the core competences on child protection and safeguarding matters are being fully utilised, the DSLs network supports the development and growth of a centre of excellence on safeguarding matters across the Trust.

4. Training

4.1 The DSL must complete regular safeguarding training to ensure that all staff are trained and up to date with policies and procedures. The DSL and any deputy DSLs will undergo training that provides them with the knowledge and skills needed to perform the role. This training should be updated as a minimum, every two years, with regular updates.

4.2 WAT will be assured that Academies comply with training requirements as defined in the latest version of KCSIE. All staff will undergo safeguarding and child protection training at induction. This training should be updated on a regular basis and aligned to the advice from the Local Safeguarding Children Board (LSCB), e-bulletins, DSL meetings, etc.

4.3 All staff will be given KCSIE Part 1 and annex b on induction. They will be asked to sign that it has been read and understood.

4.4. All staff members undertake safeguarding and child protection training at induction, including whistle-blowing procedures to ensure they understand the Academy's safeguarding system and their responsibilities, and can identify signs of possible abuse or neglect. This training will be updated annually with additional updates in line with advice from our Local Children's Safeguarding Board and our Trust.

4.5. All supply staff will be given access to the Academies code of conduct, the safeguarding and child protection policy and the allegations of abuse against staff policy. They must also be given clear guidance on how to report concerns. It must be made clear to them that they are operating within the school's safeguarding arrangements at all times.

All staff will have training on the Government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
Staff will also receive regular safeguarding and child protection updates (e.g. through emails, e-bulletins and staff meetings) as required but at least annually. Volunteers will receive appropriate training, if applicable

4.6 Trustees and LAB Members must receive appropriate safeguarding training at induction. In addition, the LAB DSG and the DDS must receive updates to their training each year. This might include being part of the staff annual update or carry out online safeguarding training.

5. Supporting Systems and Practices

5.1 WAT will standardise systems and practices across the Trust for reporting to assist with the identification of Trust-wide concerns and patterns. Such systems should maximise the support for managing casework and facilitate more effective working arrangements with other agencies.

5.2 Identified Trust Executive and central team members will have appropriate clearances in place that will provide them with direct access to all of the Academies' systems within the Trust.

6. Policy Review

6.1 The Child Protection and Safeguarding Policy will be reviewed and agreed as a minimum on an annual basis. This may be more frequent if national guidance requires ensuring that key statutory requirements are incorporated.

7. Local Arrangements

7.1 The following section contains each of the Academy's local arrangements and procedures for Safeguarding and Child Protection.

Manor Way Primary Academy

Policy Tracker – Responsibility for monitoring this policy: Lisa Buffery (Reviewed Annually or in response to changes in legislation or LSCB operating procedures)			
Date	**Reviewed By:**	**Role**	**Date Approved by the Local Advisory Body**
1/9/23	Lisa Buffery	Executive Headteacher	1st LAB meeting - October 2023

WAT Designated Director for Safeguardng (Trust Board)	Julie Houlder
WAT Strategic Lead for Safeguarding (Executive Team)	Genna Griffiths
WAT Designated Safeguarding Lead	Genna Griffiths
Designated Safeguarding Leads (DSLs)	Lisa Buffery
Executive Headteacher	Lisa Buffery
Chair of the Local Advisory Body	John Dovey
Designated Safeguarding Governor (DSG)	Andrew Oliver
Deputy DSL	Annabel Whitmore Laura Brettle
Single Point of Contact (SPOC)	Lisa Buffery
Looked After Children Designated Teacher	Annabel Whitmore
Designated Lead for E Safety	Jo Gibbons

CONTENTS

1. Policy introduction – Rationale 1.5 Definitions and Indicators of Abuse	Pg 8 Pg 8
2. Prevention	Pg 9
3. Procedures	Pg 9
4. Role of the Designated Safeguarding Lead	Pg 11
5. The Responsibility of the Local Advisory Body (LAB)	Pg 13
6. The Role of the Designated Teacher for Looked After Children	Pg 14
7. Recruitment of Staff and Volunteers	Pg 14
8. Whistleblowing	Pg 15
9. Training and Development	Pg 16
10. Curriculum	Pg 16
11. Dealing with Concerns and Disclosures – Roles and responsibilities	Pg 16
12. Procedures for when someone is concerned about a child or young person	Pg 17
13. What information you will need when making a referral	Pg 17
14. Responses from parents	Pg 17
15. Staff Support	Pg 18
16. Definitions and Additional Guidance 16.1 Physical Abuse 16.2 Emotional Abuse 16.3 Sexual Abuse 16.4 Neglect 16.5 Serious Violence 16.6 Domestic Abuse 16.7 Specific Safeguarding Issues 16.7.1Child on Child Abuse 16.7.2 Child on Child Sexual Violence and Sexual Harassment 16.7.3 Child Sexual Exploitation and Child Criminal Exploitation 16.7.4 Honour Based Abuse 16.7.5 Female Genital Mutilation 16.7.6 Breast Ironing 16.7.7 Forced marriage 16.7.8 Modern Slavery 16.8 Extended school and Offsite Arrangements 16.9 Children Missing Education 16.10 Elective Home Education (EHE) 16.11 Children with Special Educational Needs and Disabilities 16.12 Contextual Safeguarding 16.13 Children and the Court System 16.14 Prevent Strategy (Radicalisation and Extremism) 16.15 Private Fostering Arrangements 16.16 Looked after and Previous Looked after Children 16.17 Use of Reasonable Force 16.18 Childhood Mental Health 16.19 Online Safety and Mobile Phones 16.20 County Lines, Exploitation and Drug Supply 16.21 Lesbian, Gay, Bisexual and Transgender (LGBT) 16.22 Homelessness 16.23 Children in Need 16.24 Young Carers 16.25 Multi-agency working 16.26 Early Years Foundation Stage 16.27 Organisations or Individuals using school premises	Pg 18 to Pg 38

17. Useful Numbers	Pg 39
18. Implementation, Review and Monitoring	Pg 39
Appendix 1 - Dealing with a disclosure	Pg 40
Appendix 2 - What to do if concerned	Pg 41
Appendix 3 - Raising concerns	Pg 44
Appendix 4 - Threshold document	Pg 46

Child Protection and Safeguarding Policy

1. Rationale

1.1. Children and young people have a fundamental right to be protected from harm. They have a right to expect Academies to provide a safe and secure environment. It is a guiding principle of the law and child protection procedures that the protection and welfare of a child must always be the first priority. Failure to provide an effective response can have serious consequences for the child.

1.2. Safeguarding is defined as:

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

Manor Way Primary Academy is committed to safeguarding and promoting the welfare of all children and young people both within the school environment and outside. Because of the day-to-day contact with children and young people, education staff are particularly well placed to observe outward signs of abuse, changes in children's behaviour or their failure to develop. It is therefore important; 'to be alert to the possibility of abuse occurring, be aware of the procedures to be followed if you have suspicions and have the confidence to follow those procedures.' This policy applies to all staff, governors and volunteers working in the school.

1.3. Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

1.4. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or deputy). If staff have any concerns about a child's welfare, they should act on them immediately.

Definitions and Indicators of Abuse (see page 18)

1.5. WAT recognises its legal duty under s.175/157 Education Act 2002 to work with other agencies in safeguarding and promoting the welfare of children and young people and protecting them from "significant harm". The protection of our students from suffering or being likely to suffer significant harm is the responsibility of the school and wider community, superseding any other considerations. The following documents, circulars and guidance for good practice govern child protection work at Manor Way Primary Academy:

- Safeguarding Children Procedures https://dudleysafeguarding.org.uk/children/
- Dealing with a disclosure school guidance (*See Appendix 1*)
- Children Act 1989
- Children Act 2004
- Working together to safeguard children (DfE) July 2018 (Updated January 2021)

- Keeping Children Safe in Education (DfE) September 2022
- Guidance for Safer Working Practice for those working with Children and Young People in Education Settings (October 2015)
- What do you do if you are worried a child is being abused March 2015 (*See Appendix 2*)
- The Prevent Duty June 2015 (under section 26 of the Counter Terrorism and Security Act 2015)
- Children missing in education and at risk of Child Sexual Exploitation

1.6. Any child may benefit from early help, but all school staff will be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child.

2. Prevention

2.1. The six main elements of the policy are:

- Ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with children
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe
- Implementing procedures for identifying and reporting cases, or suspected cases, of abuse
- Supporting students, who have been abused in accordance with his/her child protection plan
- Establishing a safe environment in which children can learn and develop
- Ensuring there are links with other safeguarding policies and practice; for example, physical intervention, anti-bullying, behaviour policy, attendance, medical conditions, first aid, intimate care, emergency evacuation, educational visits, sexual exploitation, sexting, disability, homophobic abuse, racism, domestic abuse, female genital mutilation, radicalisation and extremism.

2.2. We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help prevention. The Academy will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to
- Ensure children know that there are adults in the school, whom they can approach if they are worried or in difficulty
- Include in the curriculum, activities and opportunities, which equip children with the skills they need to stay safe from harm

3. Procedures

3.1. Manor Way Primary Academy will ensure that all staff follow the procedures set out by the Dudley Safeguarding Children Board and take account of guidance issued by the Department for Education (DfE) to:

- Ensure we have a Designated Safeguarding Lead for child protection, who has received appropriate training and support for this role. The formal training will be updated every 2 years. The DSL will be updated on a regular basis (at least annually) to keep up with current safeguarding developments and priorities.

- The Designated Safeguarding Leads for Manor Way Primary Academy are:
  1) Lisa Buffery
  2) Annabel Whitmore
  3) Laura Brettle

3.2. Child Protection issues can be very difficult to spot. If in doubt, it is always best to inform the relevant person, and allow them to make the decision about what further action is necessary. **If in doubt ask.**

- Ensure we have a Designated Safeguarding Governor (DSG) responsible for child protection. The DSG is Andrew Oliver.
- Ensure every member of staff (including temporary and supply staff and volunteers) and governing body members knows the name of the Designated Safeguarding Leads (DSL) who is responsible for child protection in their role
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the Designated Safeguarding Lead responsible for child protection
- Ensure that parents have an understanding of the responsibility placed on the Academy and staff for child protection; parents should be made aware of the policies and procedures
- Ensure that parents are aware that this policy is available on request and make the policy available on the Academy's website
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at child protection meetings
- Develop links with other agencies that support the child, such as Child and Adolescent Mental Health Service, Education Investigation Service, Learning Support Service and Education Psychology Service
- Keep comprehensive written records of concerns about children (noting date, event, action taken, follow up, decisions reached and outcomes), even where there is no need to refer the matter to Social Services and other relevant agencies immediately
- Ensure all records are kept securely, separate from the main student file, and in locked locations
- Ensure that if a child, who has a child protection plan leaves, their information is transferred to the new school immediately and Social Care is informed
- Ensure that all staff are aware of what to do if there are concerns around a child. ***Appendix 2*** **refers to** ***What to do if you are concerned*****.** A copy of the interagency referral form that must be completed when making a referral can be accessed from the https://dudleysafeguarding.org.uk/children/ website.The DSL should be consulted for completion of this form.

4. Role of the Designated Safeguarding Lead

4.1. The Local Advisory Body (LAB) have appointed Lisa Buffery as the Manor Way Primary Academy Designated Safeguarding Lead who is an appropriate senior member of staff, from the schools leadership team. The responsibilities are as follows:-

4.2. Take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This will be explicit in the role holder's job description.

4.3. Any deputy DSL must be trained to the same standard as Lead DSL. The DSLs must liaise with Local Authority and work with other agencies in line with 'Working together to safeguard children 2018'

4.4. Refer all cases of suspected abuse to the local authority children's social care or the Police in cases where a crime or suspected crime may have been committed.

4.5. The on-line tool 'Report Child Abuse to your Local Council' directs to the relevant local children's social care contact numbers.

4.6. When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC/Headteacher and DSL to support staff who make referrals to the Channel programme.

4.7. Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required (this is a role for senior members of staff only with the relevant authority).

4.8. Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

4.9. Liaise with the Headteacher to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations/coordinating child protection activity. The DSL needs to be aware that children must have an appropriate adult during a section 47 and police investigations (PACE Code C 2019 statutory guidance)

4.10. Liaise with the LADO/MASH in the local authority for child protection concerns when there are cases which concern a staff member (this is a role for senior members of staff only with the relevant authority in school and cannot be undertaken by staff in pastoral roles such as Parent Support Advisers, Learning Mentors etc). This means when a case is ongoing and should not be confused with the right to follow the Trust's or NSPCC's Whistleblowing procedures.

4.11. Ensure each member of staff has access to and understands the Academy's child protection and safeguarding policy and procedures, especially new and part time staff.

4.12. Make sure that staff receive regular and appropriate safeguarding training/updates.

4.13. Work in partnership with the LAB DSG and provide them with relevant information and updates so that they can support and challenge the safeguarding in the school.

4.14. Be alert to the specific needs of children in need, those with special educational needs and young carers.

4.15. Ensure that this policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.

4.16. Ensure that this policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Academy in this.

4.17. Where children leave the Academy, ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

4.18. Encourage a culture of professional curiosity, as well as listening to children and taking account of their wishes and feelings, among all staff, in any measures the Academy may put in place to protect them.

4.19. The DSL, or Deputy DSL, is always available for staff to refer concerns to.

4.20. During term time the Designated Safeguarding Lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the Designated Safeguarding Lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the Designated Safeguarding Lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the Designated Safeguarding Lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term time contact.

4.21. The DSL (or deputy) will lead on early help, if appropriate liaising with other agencies and setting up inter agency assessments. Cases should be kept under constant review – considering a future referral to social services if the child's situation does not appear to improve, or gets worse.

4.22. The DSL will consider escalation if after a referral the child's situation does not appear to improve.

4.23. The DSL is expected to work with others to safeguard children (as set out in KCSIE).

Information Sharing, Confidentiality and Record Keeping

4.24. The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. Information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.

4.25. Confidentiality is an issue, which needs to be discussed and fully understood by all those working with children, particularly in the context of Child Protection. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. Advice should be sought from the Social Care Team on who should approach the alleged abuser (or parents if the alleged abuser is a child).

4.26. Information will be stored in a secure place with restricted access to designated people and be maintained in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

4.27. The Data Protection Act 2018 and the General Data Protection Regulation (from Working Together to Safeguard Children July 2018)

Practitioners must 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 General Data Protection Regulation (GDPR). To share information effectively:

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR 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'

Where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if 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.

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

In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners. Practitioners looking to share information should consider which processing condition in the Data Protection Act 2018 is most appropriate for use in the particular circumstances of the case. This may be the safeguarding processing condition or another relevant provision.

In addition to the Data Protection Act 2018 and GDPR, practitioners need to balance the common law duty of confidence and the Human Rights Act 1998 against the effect on individuals or others of not sharing the information.

IT systems can be useful for information sharing. IT systems are most valuable when practitioners use the shared data to make more informed decisions about how to support and safeguard a child.

5. The Responsibility of the Local Advisory Body (LAB)

5.1. The Trust Board will ensure that the below duties are fulfilled to the highest possible standard.

5.2. The Local Advisory Body (LAB) is the responsible body for ensuring the safety of the Academy.

5.3. The LAB will ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

This should include:

- An effective child protection and safeguarding policy
- A staff code of conduct which should amongst other things include - acceptable use of technologies, staff/pupil relationships and communications including the use of social media.

5.4. The LAB will ensure that Manor Way Primary Academy contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children. Our Academy will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of

children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

5.5. The LAB will ensure that the safeguarding arrangements take into account the procedures and practice of the local authority. This includes the requirement under Section 175/Section 157 of the Education Act 2002 which placed a duty on:-

- The governing bodies of schools to have arrangements for safeguarding and promoting the welfare of children in place
- The Local Authority to monitor compliance of maintained schools

5.6. The LAB recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and all staff have the opportunity to contribute to and shape safeguarding arrangements and the child protection and safeguarding policy.

5.7. The LAB will ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum to recognise when they are at risk and how to get help if they need it.

5.8. The LAB will ensure there are procedures in place to handle allegations against teachers, headteachers, volunteers and other staff (including supply staff).

5.9. The LAB will ensure that all staff members undergo safeguarding and child protection training at induction. The training will be regularly updated and the induction and training will be in line with advice from Windsor Academy Trust and Dudley MBC.

5.10. The LAB reviews its policies/procedures annually.

5.11. The DSG is responsible for liaising with the Headteacher and Designated Safeguarding Leads over all matters regarding safeguarding and child protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual pupils/students.

5.12. A member of the Executive Team is nominated to be responsible for liaising with the local authority and other partner agencies in the event of allegations of abuse being made against the Headteacher.

5.13. The Trust's Managing allegations of abuse against staff Policy will be followed for allegations made against staff in accordance with part 4 of Keeping Children Safe in Education.

6. The Role of the Designated Teacher for Looked After Children

6.1. The designated teacher for looked after children at Manor Way Primary Academy is Annabel Whitmore. They are responsible for promoting the educational achievement of children who are looked after. The designated teacher will work closely with the Virtual School Head, to ensure that pupil premium funding is best used to support the progress of the looked after child.

7. Recruitment of Staff and Volunteers

7.1. WAT is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our children and have their welfare and protection as the highest priority.

7.2. Safer Recruitment and vetting procedures are followed for all appointments of staff including those working in a voluntary / unpaid capacity. The Headteacher will risk assess and apply appropriate professional judgement when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. All Work Experience placements will be Risk Assessed. Where those are deemed high risk, a DBS will be obtained.

7.3. Every interview panel will have at least one member who has undergone Safer Recruitment Training. Manor Way Primary Academy will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment.

7.4. Manor Way Primary Academy will ensure that agencies and third parties supplying staff provide the Academy with evidence that they have made the appropriate level of safeguarding check on individuals working in our Academies.

7.5. Manor Way Primary Academy will ensure that all staff involved in recruitment are aware of guidance on safer recruitment.

7.6. Manor Way Primary Academy will record all information on the checks carried out on their Single Central Record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files, including any risk assessments undertaken. WAT will follow statutory requirements in retaining copies of these checks.

7.7. Where Children are placed in alternative provision, the Academy must ensure that the provider (of AP) has completed all vetting and barring checks that are necessary. A written statement will be requested.

Work Experience

7.8. Guidance set out in KCSIE September 2021 will be followed. All work experience placements will be risk assessed. Where deemed high risk, a DBS will be obtained.

7.9. Adults who supervise pupils on work experience. When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

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

Home Stays (Exchange Visits)

7.11. Parents of host families must be DBS checked – enhanced. Other persons in the family over the age of 16 – school can decide whether to do enhanced DBS check for those that live in the same house.

7.12. Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Disqualified by Association

7.13. In October 2014, the government issued supplementary guidance to 'Keeping Children Safe in Education (2014)'. School staff are disqualified from working in a school, when they 'live or work in the same household' as someone who is barred from working with children or young people, even if they would not otherwise be disqualified themselves.

In September 2018 this guidance was changed and there is no longer a requirement for staff in educational settings to disclose. The duty is now only applicable in a residential setting such as child minders in their own home.

8. Whistleblowing

8.1. All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in the Academy's safeguarding regime and concerns will be taken seriously by the senior leadership team.

8.2. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff policies, are in place for such concerns to be raised with the school's senior leadership team.

Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, staff may seek free confidential help from the independent charity, **Public Concern at Work,** Tel: 0207 404 6609 whistle@pcaw.co.uk

9. Training and Development

9.1. Manor Way Primary Academy will ensure that:

- All staff are kept up to date with Child Protection issues with annual, formal training taking place; online courses, external training and in-house training provided throughout the year (this includes online safety)
- Clear reminders of all procedures will be given out to all staff on the training day at the start of every academic year, with frequent reminders at teacher and teaching assistant meetings, meetings with lunchtime supervisors, training events, weekly staff briefings and subsequent training days
- The Designated Safeguarding Leads will take part in advanced level training (Core Working Together) at least every two years
- All policies and procedures will follow DFE guidance on Child Protection issues
- LAB members will be kept informed about procedures through the Child Protection DSG
- Good monitoring takes place of students identified as at risk
- The pastoral team (Headteacher, Deputy Headteacher, SENCo and Assistant SENCo) works closely with outside agencies to share information and coordinate support for the student.

10. Curriculum

10.1. WAT considers how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through PSHCE, RSE and Health Education, SMSC, British Values, e-safety, assemblies, approved visitors etc. The new statutory RSE and Health Education Curriculum is being taught in all schools from the summer term of 2021.

10.2. We will provide opportunities for pupils/students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being. Relevant issues will be addressed through the PSHCE curriculum, for example self-esteem, emotional

literacy, assertiveness, power, sex and relationship education, e-safety and bullying. Issues will be addressed through other areas of the curriculum, for example, circle time, English, History, Drama, Art.

10.3. All policies which address issues of power and potential harm, for example bullying, equal opportunities, handling, positive behaviour, will be linked to ensure a whole school approach. The Child Protection and Safeguarding policy cannot be separated from the general ethos of the Academy, which should ensure that pupils/students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

10.4. We have a focus on preventative education which is reflected in whole-school approach to preparing pupils for life in modern. This includes a culture of zero tolerance to sexism, misogyny/misandry, homophobia, biphobia and sexual violence and sexual harassment.

11. Dealing with Concerns and Disclosures – Roles and Responsibilities

11.1. All staff will be concerned about children and young people as below:-

- A child may disclose something that has upset or harmed them
- Someone else might report something that a child has told them, or that they believe that a child has been or is being harmed
- A child might show signs of physical injury for which there appears to be no explanation
- A child's behaviour may suggest he or she is being abused
- The behaviour or attitude of one of the workers towards a child may cause concern
- A child demonstrates worrying behaviour towards other children.

11.2. Staff are aware that to consult with the DSL does not mean a referral has been made. This decision is the responsibility of the DSL for child protection who will contact the appropriate agency as and when required.

11.3. If you are unhappy with the response you receive from your Designated Safeguarding Lead all staff have the right to contact Dudley MBC Children's Services.

11.4. The Academy will always discuss concerns with parents/carers unless to do so would:

- Place the child at risk of significant harm or further risk of significant harm
- Place a vulnerable adult at risk of harm
- Compromise any enquiries that need to be undertaken by children's social care or the police.

11.5. Our Academy will endeavour to ensure that parents have an understanding of the responsibilities placed on the school and staff for safeguarding children.

11.6. **UNDER NO CIRCUMSTANCES SHOULD YOU LEAVE SCHOOL WITHOUT DISCUSSING YOUR CONCERNS WITH SOMEONE.**

11.7. Only a minority of children actively disclose abuse. Most child abuse is disclosed accidently or through observation by an adult of a child's behaviour, words and physical appearance.

11.8. When a child does disclose abuse, this needs to be taken very seriously. It is important that any disclosure is dealt with appropriately, both for the wellbeing of the child and also to ensure that your actions do not jeopardise any legal action against the abuser.

12. Procedures for When Someone is Concerned About a Child or Young Person

- The pastoral team (Head teacher, Deputy Head teacher, SENCo and Assistant SENCo) works closely with outside agencies to share information and coordinate support for the student
- All concerns for children and young people should be recorded using the Academy's recording system
- All concerns should be recorded as soon as possible & shared with DSL, (within one hour)
  all verbal conversations to be promptly recorded in writing on Academy's on line system
- All concerns should be referred to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead in their absence.
  In Manor Way Primary Academy:- concern forms are located in the staffroom and online, records are stored in the Executive Headteachers office and online at CPOM's, DSL is alerted by the person who the disclosure was made to.
- All concerns of significant harm should be referred to the Dudley Local Authority Children's Services (MASH) without delay (see appendix 1)
- All concerns shared with the Designated Safeguarding Lead should be considered alongside Dudley MBC Safeguarding Children's Board Multi Agency thresholds (child protection, early Help offer)
- All concerns of allegations in relation to staff and volunteers harmful behaviour should be referred to the Headteacher/Headteacher (if the concern is in relation to the Headteacher the CEO should be informed without delay) **for onward referral to LADO** See appendix 2.

13. What Information Will You Need When Making a Referral

You will be asked to provide as much information as possible; such as the child's full name, date of birth, address, school, GP, languages spoken any disabilities the child may have, details of the parents, other siblings, chronology of previous concerns.
Do not be concerned if you do not have all these details, you should still make the call.

14. Responses From Parents

Research and experience indicates that the following responses from parents may suggest a cause for concern across all categories of abuse:-

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home or
- Violence between adults in the household.

You should follow up the verbal referral in writing, within 24hrs. This should be done on a MARF (multi agency referral form). This can be downloaded from https://dudleysafeguarding.org.uk/children/

Call the Multi Agency Safeguarding Hub (MASH), Initial Response Team:

Tel: 0300 555 0050 Option 3 Monday–Friday 9am–5pm

Tel: 0300 555 8574 Emergency Response Team

Some of our pupils may not reside within Dudley MBC and we are aware that we should locate the number for the child's Local Authority's child protection referral team.

15. Staff Support

We recognise the stressful and traumatic nature of child protection work. We will support staff providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and seek further support as appropriate.

16. Definitions and Indicators of Abuse

There are four types of child abuse. They are defined in the UK Government guidance Keeping Children Safe in Education; statutory guidance for schools and colleges, September 2018 as follows:
1. Physical Abuse
2. Emotional Abuse
3. Sexual Abuse
4. Neglect

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

All staff are aware of safeguarding issues and aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

16.1 Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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.

The following may be indicators of physical abuse (<u>this is not designed to be used as a checklist</u>):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help

- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying or
- Isolation from peers.

16.2 Emotional Abuse

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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), 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.

The following may be indicators of emotional abuse (<u>this is not designed to be used as a checklist</u>):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self -harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communication suddenly (known as "traumatic mutism") can indicate maltreatment.

16.3 Sexual Abuse

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

(including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and child on child abuse.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusual compliance
- Regressive behaviour, enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming or
- Bruises or scratches in the genital area.

16.4 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 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.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing caring for siblings
- The child is regularly not collected or received from school or
- The child is left at home alone or with inappropriate carers

16.5 Serious Violence

All staff should be aware of indicators (e.g. being male, frequently absent, permanently excluded, having experienced maltreatment as a child and having been involved in offending, such as theft or robbery), which may signal that children are at

risk from, or are involved with serious violent crime (see the latest KCSIE for more information). If a staff member has a concern regarding serious violence, they must raise it immediately with their DSL and follow their school's process for reporting and recording concerns.

16.6 Domestic Abuse

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members, regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- Psychological, Physical, Sexual, Financial and Emotional

Exposure to domestic abuse can have serious long lasting effects on children (emotional and psychological). It can occur within personal relationships as well as in home context. Children who witness domestic are also victims and need to be supported as such.

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

Coercive behaviour is: An act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate). Operation encompass is where the police and the local authority will inform schools when they are called to an incident of domestic abuse.

The national domestic abuse helpline which can be called free of charge and in confidence 24 hours a day on 0808 2000247. This can be used for victims or those who are worried about friends or loved ones.

16.7. Specific Safeguarding Issues

You should also be aware of any specific safeguarding issues outlined in KCSIE Annex B, including:

Children missing from education | missing children and adults | fabricated or induced illness | children missing from home or care | bullying / cyberbullying | relationship abuse | private fostering | forced marriage | drugs | trafficking | faith abuse | hate | domestic violence | sexting | mental health issues | child sexual exploitation | preventing radicalisation | female genital mutilation | gender based violence | gangs / youth violence

16.7.1. Child on Child Abuse

All staff are aware that children can abuse other children and that it can happen both inside and outside of school, and online. This is most likely to include, but not limited to:

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

Staff are clear as to the school policy and procedures with regards to child on child abuse as defined in the anti-bullying, school behaviour policy and broader child protection procedures. Staff understand that even if there are no reports it does not mean it is not happening. As such it is vital that if staff have any concerns regarding child on child abuse they should speak to their DSL (or Deputy DSL).

Child on Child abuse will not be tolerated by WAT or minimised in any way and is always taken seriously. Staff understand the importance of challenging inappropriate behaviours between peers that are actually abusive in nature.

All allegations of child on child abuse will be recorded as per school system, investigated and dealt with accordingly. Victims, perpetrators and other children affected by child on child abuse will be supported through school and multi-agency support mechanisms. We make it clear to children how and where they can confidently report abuse, knowing that it will always be taken seriously.

Signs that a child may be suffering from child on child abuse can also overlap with those indicating other types of abuse and can include:

- Failing to attend school, disengaging from classes or struggling to carry out school
  related tasks to the standard ordinarily expected
- Physical injuries
- Experiencing difficulties with mental health and/or emotional wellbeing
- Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety
  and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much
- Broader changes in behaviour including alcohol or substance misuse
- Changes in appearance and/or starting to act in a way that is not appropriate for the

child's age
- Abusive behaviour towards others.

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

16.7.2. Sexual Violence and Sexual Harassment Between Children

Sexual violence and harassment of any kind is not acceptable and will not be tolerated. It should not be passed off as ‘banter’, ‘having a laugh’, “part of growing up” or “boys being boys”. Downplaying some behaviours related to abuse 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

This guidance follows part 5 of KCSIE and must be read and understood by DSLs and is advised to be read by staff.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware that the evidence shows that 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. However, we will be vigilant for all students.

Staff will be supported to deal with incidents of child sexual violence/sexual harassment with appropriate training.

We clearly communicate with children how they can report abuse that they have experienced personally, witnessed or heard about.

What is sexual violence and sexual harassment?

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with children maintain an attitude of ‘it could happen here’.

Sexual violence is defined under the Sexual Offences Act 2003 as rape, assault by penetration or sexual assault (sexual touching) without consent. Consent is about having the freedom and capacity to choose. The age of consent to any form of sexual activity is 16.

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. 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. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the

experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence and
- sexting – sending sexually inappropriate text messages (for further sexting advice see UKCCIS guidance).

Responding to reports of sexual violence or sexual harassment

Ultimately, any decisions need to be made 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 children's social care and the police as required.

The response to a report of sexual violence or sexual harassment

- Children may not find it easy to tell staff
- Looks for signs, pupils may show signs or act in ways that they hope adults will notice
- Act immediately
- Initial response from adults and school is vital - don't compromise confidence of future victims
- All victims reassured, taken seriously - supported and kept safe. Nothing downplayed or made to feel ashamed
- It should be explained that the law is in place to protect them rather than criminalise them and this should be explained in such a way that avoids alarming or distressing them
- Report in line with safeguarding reporting procedures within this policy. Report to DSL immediately and then involve social care if required
- If possible manage reports with two staff members present, one preferably the DSL
- Where the report includes an online element be aware of searching, screening and confiscation advice (for schools) and the 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
- Don't promise confidentiality - very likely report will need to be shared. Make sure the victim knows the next steps
- Be supportive and respectful. Listen carefully to the child, reflect back, use the child's language, do not ask leading questions and only prompt the child with open questions
- Consider support for any siblings that may be required following any incident
- Best practice is to wait until the end of the report to write up a thorough summary, although it is possible to make notes, particularly if a second staff member is present. Do not allow note making to get in the way of giving the child your full attention. Either way a written report is essential
- Only record facts and not staff members' personal opinions.

Whether the reported incident has taken place on site or off site, or whether it involves a child from another school or college, the safeguarding duty remains the same.

Confidentiality and Information Sharing

Staff taking a report should never promise confidentiality as it is very likely it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage with appropriate agencies. School should only engage

staff and agencies required to support the children involved and/or be involved in the investigation. The victim may ask for it not to be shared. If the victim does not give consent to share, staff can still share it, if it is justified to be in the public interest, e.g. to protect children from harm.

The DSL or Deputy DSL, should consider the following:

- parents or carers should normally be informed (unless it puts victim at greater risk)
- if child at risk of harm, is in immediate danger, or had been harmed, a referral should be made to children's social care and
- rape, assault by penetration and sexual assaults are crimes. Where a report of one of these is made, this should be referred to the police. Whilst age of criminal responsibility is 10, police should still be informed if the child is under 10. Police will take a welfare approach rather than criminal for a child under 10.

Ultimately the DSL (or Deputy) will have to balance a victim's wishes against their duty to protect the victim and other children. If the DSL (or Deputy) decide to refer to children's services or the police against a victim's wishes, this should be handled extremely carefully, with the reasons explained and professional support offered.

Risk Assessment

See the DfE guidance for more detailed information. Where there has been a report of sexual violence, the DSL (or Deputy) should make an immediate risk and needs assessment. Where the report is sexual harassment, the need for a risk assessment should be on a case-by-case basis. The risk assessment should consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s) and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments should be recorded and kept under review. As part of risk assessments, the DSL (or Deputy) should ensure they are engaging with children's social care and specialist services as required.

Action following a report of sexual violence and/or sexual harassment

Schools and colleges should carefully consider any report of sexual violence and/or sexual harassment both online and offline. Important considerations will include:

- the wishes of the victim and how they want to proceed and the control of the investigation and support. However, this needs to be balanced with the school's need to protect other children
- the nature of the alleged incident (s), including: whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is an alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- 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)
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- are there ongoing risks to the victim, other children, adult students or school or college staff? and

- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Always act in the best interests of the child. Immediate consideration should be given to how best to support and protect the victim and the alleged perpetrator (s) (and any other children involved/impacted). Further information on this support can be found in part 5 of KCSIE and the DfE guidance.

Four likely scenario actions following a report:

1. **Manage internally -** 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 manage the incident internally, utilising our behaviour policy, exclusion and/or by providing pastoral support. 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.

2. **Early help** - children may not require a statutory service but would benefit from early help.

3. **Refer to children's social care** - where a child has been harmed, is at risk of harm, or is in immediate danger.

4. **Report to the police** - any report to the police generally done in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police.

   Safeguarding and supporting the victim, the alleged perpetrators (s) and other children must be an ongoing consideration.

   See further guidance in KCSIE for managing the report, referrals, police reporting, criminal process, ongoing response, safeguarding and supporting the victim and the perpetrator, etc.

Sanctions and the alleged perpetrator (s)

Disciplinary action (in accordance with WAT policies, such as behaviour and/or exclusions) 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 a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a sanction accordingly. This is a matter for the school and should be carefully considered on a case-by-case basis. The designated safeguarding lead (or a deputy) should take a leading role in consultation with the headteacher (and WAT's Lead DSL if required). The school 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 school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is considering the same facts. See KCSIE for further information.

What further support is available?

The NSPCC are working with the Government to provide support in this area. The NSPCC have launched a dedicated helpline for children and young people who have experienced abuse at school, and for worried adults (including parents) and professionals that need support and guidance. NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk.

The Anti-Bullying Alliance have produced some useful guidance for schools on preventing sexual bullying: https://www.anti-bullyingalliance.org.uk/tools-information/all-about-bullying/sexual-and-sexist-bullying/preventing-sexual-bullying

How will students be educated in this area?

We follow the DfE's Relationships and Sex Education (RSE) and Health Education statutory guidance. This tackles issues such as: healthy and respectful relationships; what respectful behaviour looks like; consent; gender roles, stereotyping, equality; body confidence and self-esteem; prejudiced behaviour; sexual violence and sexual harassment, etc. In addition to this curriculum provision, we also teach children about appropriate sexual behaviour and respectful relationships through form time, assemblies and by learning from specialist visitors such as the police and the NSPCC.

16.7.3. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Some of the following can be indicators of both CCE AND CSE where children:

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

Child Criminal Exploitation (CCE)

Some specific forms for CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pick pocketing, vehicle crime or threatening/committing serious violence to others. Children can often become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or trap and coerce them into debt.

As children involved in CCE often commit crimes themselves, their vulnerability as victims is not always recognised by the adults and professionals, and they are not treated as victims despite the harm they have experienced.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. The sexual abuse may involve:

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

Like all forms of child sexual abuse, child sexual exploitation:

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

Please refer to Dudley Safeguarding Children Board procedures to consider completion of the screening tool and/or NWG risk assessment.

16.7.4. **Honour Based Abuse**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the Designated Safeguarding Lead**.**

16.7.5. Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Mandatory reporting commenced in October 2015; where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will is a statutory duty upon that individual to report it to the police. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what

is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's Designated Safeguarding Lead and involve children's social care as appropriate.

A girl at immediate risk of FGM may not know what's going to happen. But she might

talk about or you may become aware of:

- A long holiday abroad or going 'home' to visit family
- Relative or cutter visiting from abroad
- A special occasion or ceremony to 'become a woman' or get ready for marriage
- A female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt
- Unexpected, repeated or prolonged absence from school
- Academic work suffering.

She may have difficulty walking, standing or sitting

- Spend longer in the bathroom or toilet
- Appear withdrawn, anxious or depressed
- Have unusual behaviour after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear.

16.7.6. Breast Ironing

What is breast ironing?

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

Why does breast ironing happen?

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

Breast ironing is physical abuse

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

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

Breast Ironing in the UK

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as a 1,000 girls at risk. Keeping Children Safe in Education (2018) mentions breast ironing on page 80, as part of the section on so-called ‘Honour Violence’. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible.

Schools need to know the risk level within their communities and tackle the risk as appropriate.

16.7.7. Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. In the UK it is recognised as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Honour based violence can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour/Izzat code. Staff have been briefed on the indicators of possible forced marriage and honour based violence and will refer any concerns to the Designated Safeguarding Lead immediately. The link to the Government forced marriage guidance 'The Right to Choose'. School and college staff can contact the Forced Marriage Unit for advice and information – contact – 02070080151 or email fmu@fcdo.gov.uk

16.7.8. Modern Slavery

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. 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: how to identify and support victims - GOV.UK (www.gov.uk).

16.8. Extended School and Off Site Arrangements

Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site the school will undertake checks to ensure that they provide adequate safeguarding arrangements.
When pupils attend off-site activities, including day and residential visits and work related activities, the school will ensure that the proprietors of the activity/venue operate safe practices to maintain the safety of our children/young people and liaise with investigating agencies in the locality relevant to where the concern has taken place.

16.9. Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education (CME) supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

School and college staff should follow the school's or college's procedures for

dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

The Academy has in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions.

The Academy will inform the local authority of any pupil who is going to be deleted from the admission register where they:

- Have been taken out of the Academy by their parents and are being educated outside the school system e.g. home education
- Have ceased to attend the Academy and no longer live within reasonable distance of the school at which they are registered
- Have been certified by the Academy medical officer as unlikely to be in a fit state of health to attend the Academy before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the Academy after ceasing to be of compulsory school age
- Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the Academy at the end of that period or,
- Have been permanently excluded.

Further information on schools' CME responsibilities can be found in the DfE's CME statutory guidance for Local Authorities.

All staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

The Academy will inform the local authority of any pupil who fails to attend the Academy regularly, or has been absent without the Academy's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

The Academy puts significant emphasis on attendance and closely monitors all pupils attendance, contacting home when a student is absent.

The Academy will hold at least two emergency contacts for each student.

16.10. Elective Home Education (EHE)

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

Schools will make a record of communications and decisions regarding EHE and log

them on their safeguarding systems.

16.11. Children with Special Educational Needs and Disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Staff in our Academy recognise that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing signs and
- communication barriers and difficulties in overcoming these barriers.

We ensure that additional support is provided to support the most vulnerable students in our school. Staff will be aware and vigilant of the additional challenges pupils with SEND may face.

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment. for example, callipers, sleep boards, inappropriate splinting
- Misappropriation of a child's finances or
- Inappropriate invasive procedures.

Further information can be found in the department for education's:

- SEND Code of Practice 0 to 25 years, and
- Supporting Pupils at School with Medical Conditions.

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledchildren.org.uk)
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

16.12. Contextual safeguarding

Consider whether wider environmental factors are present in a child's /children's life, that may be a threat to their safety or welfare. Contextual factors: safeguarding incidents and/or behaviours can be associated with factors outside the Academy /or can occur between children outside of the Academy.

All staff, but especially the Designated Safeguarding Lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

16.13. Children and the court system

Children are sometime 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. They explain each step of the process and 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 Ministry of Justice

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

16.14. Prevent Strategy (Radicalisation and Extremism)

Manor Way Primary Academy is actively involved in the Prevent strategy. The Academy has a part to play in fostering shared values and promoting cohesion. Extremist ideology runs counter to the Academy and British values. Therefore, our community aims to successfully promote respect and tolerance for others, the rights of all to live and study free from persecution of any kind, freedom of speech, democracy, the rule of law and equality of opportunity and treatment. Extremism promotes fear and division and actively seeks to cause destructive relationships between different communities. Our Academy strategy for preventing extremism has five key objectives:

1. To promote and reinforce school and British values; to create space for free and open debate; listen and support the learner voice and enable students to develop their self-knowledge, self-esteem and self-confidence.
2. To promote social cohesion by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society.
3. To ensure student safety and that the school is free from bullying, harassment and discrimination.
4. To provide support for students who may be at risk and offer appropriate sources of advice and guidance.
5. To ensure that students and staff are aware of their roles and responsibilities in preventing terrorism and radicalisation.

Manor Way Primary Academy values freedom of speech and the expression of beliefs/ ideology as fundamental rights underpinning our society's values. Both

pupils/students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Our Academy, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding Lead.

Staff should use their judgement in identifying children who may be at risk of radicalisation and act proportionately which may involve the DSL (or Deputy DSL) making a Prevent referral.

The SPOC for Manor Way Primary Academy is Lisa Buffery. The responsibilities of the SPOC are described on page 28.

Indicators of Vulnerability to Radicalisation

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

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

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

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

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

Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that Academy staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- Personal Crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
- Personal Circumstances – migration; local community tensions; and events affecting the student’s country or region of origin may contribute to a sense of

grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – the student may have perceptions of injustice; a feeling of failure; rejection of civic life
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration
- Special Educational Need – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

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

More critical risk factors could include:

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

Preventing Violent Extremism - Roles and Responsibilities of the Single Point of Contact (SPOC)

The SPOC is responsible for:
- Ensuring that staff of the school are aware of who is the SPOC in relation to protecting students from radicalisation and involvement in terrorism
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism
- Raising awareness about the role and responsibilities of the school in relation to protecting students from radicalisation and involvement in terrorism
- Monitoring the effect in practice of the Academy's RE curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs
- Raising awareness within the school about the safeguarding processes relating to protecting students from radicalisation and involvement in terrorism
- Acting as the first point of contact within the school for case discussions relating to students who may be at risk of radicalisation or involved in terrorism
- Collating relevant information from/ in relation to referrals of vulnerable students into the Channel** process
- attending Channel** meetings as necessary and carrying out any actions as agreed
- Reporting progress on actions to the Channel** Co-ordinator, and
- Sharing any relevant additional information in a timely manner.

The Counter Terrorism and Security Act 2015 was published on 12th March 2015. Section 26 of the Act places a duty on schools in England (and Wales) to prevent people being drawn into terrorism.
Schools leaders (including governors) must:

- Establish or use existing mechanisms for understanding the risk of extremism

- Ensure staff understand the risk and build capabilities to deal with it
- Communicate and promote the importance of the duty
- Ensure staff implement the duty effectively

Duties on schools include:

- Effective partnership working with other local agencies, eg. LSCB, police, health, etc.
- Information sharing
- Maintaining appropriate records
- Assessing local risk of extremism (including Far Right extremism)
- Demonstrating they are protecting children
- Developing clear protocols for visiting speakers
- Safeguarding policies that take account of LSCB policies and procedures
- Training staff to give them knowledge and confidence
- Ensuring there is robust ICT protocols that filter out extremist materials
- School buildings must not be used to give a platform to extremists.

** Channel is a multi-agency approach to provide support to individuals, who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability

Prevent referrals may result in a Channel Panel which the school may be asked to attend to do an assessment. Statutory guidance on Channel is available at: Channel guidance.

16.15. **Private Fostering Arrangements**

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent will not be a private foster carer. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child.
The private foster carer becomes responsible for providing the day to day care of the child in a way which will promote and safeguard his welfare. Overarching responsibility for safeguarding and promoting the welfare of the privately fostered child remains with the parent or other person with parental responsibility. Local authorities do not formally approve or register private foster carers. However, it is the duty of local authorities to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted. It is the local authority in whose area the privately fostered child resides which has legal duties in respect of that child.

There is a mandatory duty to inform local authority of children in private fostering arrangements.

All staff in our school will inform the Designated Safeguarding Lead of any children that fall into the category of private fostering.

16.16. **Looked after children and previously looked after children**

In cases of looked after or previously looked after pupils, the DSL should have details of child's social worker and name of Virtual Head of School in Local Authority.

The DSL should have information regarding the child's looked after legal status (whether looked after via a voluntary arrangement of interim or full care order).

- Information regarding care arrangements and levels of authority delegated to the carer
- Information regarding contact arrangements with birth parents or those with parental responsibility.

A previously looked after child remains potentially vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. It is important that all agencies work together and prompt action is taken when necessary to safeguard this particularly vulnerable group of pupils.

Looked after pupils must have a designated leader who will promote the educational achievements of looked after pupils (Section 20 Children and Young Persons Act 2008).

The designated teacher must have appropriate training, qualifications and experience.

The designated teacher will also promote educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or adopted from state care outside England and Wales.

16.17. **Use of Reasonable Force**

Use of reasonable force is a professional judgement of staff and will always depend on the individual circumstances. "Reasonable force" means "using no more force than is needed" KCSIE Paragraph 108. This may involve passive physical contact (standing between pupils or blocking a child's path) or active contact (removing a pupil from a situation). When responding to pupils with SEN or disabilities the risk should be carefully assessed recognising the vulnerability of this group. Individual behaviour plans for pupils of vulnerable groups – agreed with parents should be drawn up to reduce the occurrence of challenging behaviour and the need to use "reasonable force".

16.18 Childhood Mental Health

Mental health and suicidal thoughts can affect anyone, of any age, of any background, at any time. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Where children have suffered abuse, neglect, or potentially traumatic adverse childhood experiences, it is key that staff are aware of how this can impact on their mental health, behaviour and education.

It can be difficult to know if a child is suffering as they often keep it to themselves.

Some characteristics for childhood mental health may be:-

- Becoming withdrawn from family and friends
- Persistent low moods and unhappiness
- Tearfulness and irritability
- Worries that stop them carrying out day to day tasks

- Sudden outbursts of anger directed toward others or themselves
- Loss of interest in activities that they used to enjoy
- Problems eating and sleeping

Any member of staff or volunteer who suspects a child or young person is suffering mental health and it is a safeguarding concern, they should record, consult and share their concerns with the DSL immediately.

Further advice can be found via:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf
and here through DfE guidance in 2021

16.19 Online Safety (Inc teaching online safety, monitoring and filtering, etc)

The use of technology has become a significant component of many safeguarding issues. CSE; radicalisation; sexual predation: technology often provides the platform that facilitates harm. Risks can be categorised in three areas:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm
- **Commerce:** risks such as online gambling, phishing or financial scams.

A whole school approach is taken to online safety. We endeavour to ensure appropriate filters and appropriate monitoring systems are in place. Our Children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social, health and economic education (PSHE) and Relationships and Sex Education (RSE) and Health Education. All Trust schools will implement the Government's new mandatory guidelines for Relationships and Sex Education in September 2021.

All Academies have appropriate internet filtering and monitor all activity accordingly. Windsor Academy Trust adheres to the DfE's filtering and monitoring standards and reviews these on an annual basis. DSLs and staff should ensure that they follow the WAT's roles and responsibilities in relation to filtering and monitoring. Please see our e-safety policy for further information.

Whilst we ensure that appropriate filters and monitoring systems are in place (which are reviewed regularly), we are mindful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding. Child acceptable user policies are in place drawn up with pupils to ensure safe access to the internet at all times (when children use 3G/4G data on phones for example).

Academies will share advice to parents, students, staff and professionals on how to stay safe online (both inside and outside of school), including sharing some of the online challenges and sites that are not appropriate

Mobile phones and cameras

For further information on the use of mobile phones, cameras and sharing of images please see our e-safety policy and our Acceptable Use policy.
We recognise that personal mobile phones have the potential to be used inappropriately and therefore the Academy has developed a policy to outline the

required protocol for all employees, pupils, volunteers, governors and parents/ carers. Staff, volunteers, parents must not use personal phones or devices to take pictures of pupils at any time, even when on educational visits.

16.20 County Lines, Exploitation and Drug Supply

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children are also increasingly being targeted and recruited online using social media.

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

Should we have reason to believe a pupil has become involved we will make referrals to both the Police and Social Care.

16.21 Lesbian, Gay, Bisexual and Transgender (LGBT)

As a Trust, we believe that respect for ourselves and others is a fundamental right and responsibility of/for all. We will always challenge inappropriate language or behaviour and never ignore ‘banter’.

It is the duty of all staff to ensure that every member of the school community feels valued, irrespective of their sexual/gender orientation, race or religion. Diversity is celebrated and valued within WAT. Children who are LGBT (or are perceived to be) can be targeted by other children. It is vital that we provide a safe space and a trusted adult with whom they can be open to reduce the additional barriers faced.

16.22 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. Where a DSL establishes a student faces the possibility of being made homeless they should liaise with the family and engage Early Help and therefore housing to seek the appropriate support. Where a young person faces the imminent risk of becoming homeless the DSL should contact Mash for urgent support. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

16.23 Children in Need

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.

16.24 Young Carers

It is the responsibility of the designated lead (or a deputy) to keep a record of those pupils who play the part of a major carer for a family member. However, such families do not often publicise their situation for fear of social care involvement. The Academy will offer a support package to these pupils appropriate to their individual situation.

16.25 Multi-agency working

WAT schools have a pivotal role to play in multi-agency safeguarding arrangements and will engage fully with their safeguarding partners. New safeguarding partners and child death partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children. WAT schools will make themselves aware of and follow their new local arrangements. See the latest version of KCSIE for further details. 'NPCC - When to call the police' should help Designated Safeguarding Leads understand when they should consider calling the police and what to expect when they do.

16.26 Early Years Foundation Stage (EYFS)

In relation to the EYFS, WAT schools follow the relevant guidance set out in this policy and the specific safeguarding requirements set out in the statutory framework for the EYFS.

16.27 Organisations or Individuals using school premises

Schools should ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

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

Keeping Children Safe in Education – Part 1 and Annex B

All staff working with children must read and adhere to the information contained in the latest version of KCSIE Annex B covering areas such as:

- Children and the court system
- Children missing from education
- Children with family in prison
- Child sexual exploitation
- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness

- Honour based violence
- FGM
- Forced Marriage
- Preventing radicalisation
- Channel
- Child on child abuse
- Sexual violence and sexual harassment between children
- Upskirting
- The response to a report of sexual violence or harassment
- Additional advice and support
  - ETC

2 Useful Numbers

(Relevant contact details are displayed on posters around the school)

Dudley Single Point of Access/MASH:	0300 555 0050
Emergency Duty Team	0300 555 8574
Police	101
Child Abuse Investigation Unit	101
Local Authority Prevent Officer	Yvonne Nelson Brown - 01384 813164

2 Implementation, Review and Monitoring

Implementation will take place by ensuring this policy is discussed at the full LAB meeting and ensuring all staff are made aware of its existence.

This Policy will be monitored and reviewed on an annual basis and whenever significant changes to legislation, guidance or changes to local procedures require it. The cover page of this policy states the dates of review ratification by the LAB.

Manor Way Primary Academy

Appendix 1

Dealing with a Disclosure of Abuse

When a child tells me about abuse s/he has suffered, what must I remember?

- Stay calm
- Do not communicate shock, anger or embarrassment

- Reassure the child. Tell her/him you are pleased that s/he is speaking to you
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed
- Tell the child that it is not her/his fault
- Encourage the child to talk but do not ask "leading questions" or press for information
- Listen and remember
- Check that you have understood correctly what the child is trying to tell you
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected
- Do not tell the child that what s/he experienced is dirty, naughty or bad
- It is inappropriate to make any comments about the alleged offender
- Be aware that the child may retract what s/he has told you. It is essential to record all you have heard
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations (*See your electronic recording system, e.g. CPOMS or Appendix 3 Reporting form)*
- Academies using CPOMS electronic system must see DSL in person as a matter of urgency.

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to children's social care without delay, by the Designated Safeguarding Lead or the Headteacher.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Lead or Headteacher.

Appendix 2

Reporting concerns, allegations and poor safeguarding practice

1. **<u>Concerns outside the immediate environment</u> (e.g. a parent or carer)**
   - Report your concerns to the Designated Safeguarding Lead, who should contact Social Care Team or the Police as soon as possible
   - If the Designated Safeguarding Lead is not available, then the Headteacher or the person currently responsible for the school should be informed. (This is to ensure there is no delay in seeking advice or making a referral)
   - Social Care Team and the Designated Safeguarding Lead will decide how to involve the parents/carers. Parents should not be informed if to do so would 'increase risk to the child'
   - Maintain confidentiality on a **need to know** basis only
   - **See the flow chart at the end of this appendix for a visual of the process.**

Information for social care or the police about suspected abuse: To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern, which should include the following:

- The reasons for your concern
- Full name and date of birth of the child
- Names and dates of birth of the child's family/household members
- Other agencies/professionals involved with the family
- The child's first language and any special needs
- The child's developmental needs, family and environmental factors and parenting capacity
- Any work you may have already undertaken with the child and family.

All incidents will be reported on an Inter-Agency Referral form, by the Designated Safeguarding Lead, to the Multi Agency Safeguarding Hub at mash_referrals@dudley.gov.uk.

2. **<u>Allegations or concerns about someone working with children</u>**

It is not the responsibility of anyone working within Manor Way Primary Academy in a paid or unpaid capacity to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns by reporting these to the appropriate officer or the appropriate authorities (this includes allegations made against all staff, including supply staff and volunteers).

Manor Way Primary Academy will ensure all staff (including supply staff) and volunteers, will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child.

All allegations or suspicions of abuse will be taken seriously and treated in accordance with WAT's Concerns or Allegations Against Staff Policy and part 4 of KCSIE. We categorise concerns in the following ways:

a. <u>Allegations that may meet the harms threshold</u> when it is alleged that anyone working in the school 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 they may not be suitable to work with children.

b. <u>Concerns that do not meet the harms threshold</u> – known as 'low level concerns'. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf

of the school or college may have acted in a way that:

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

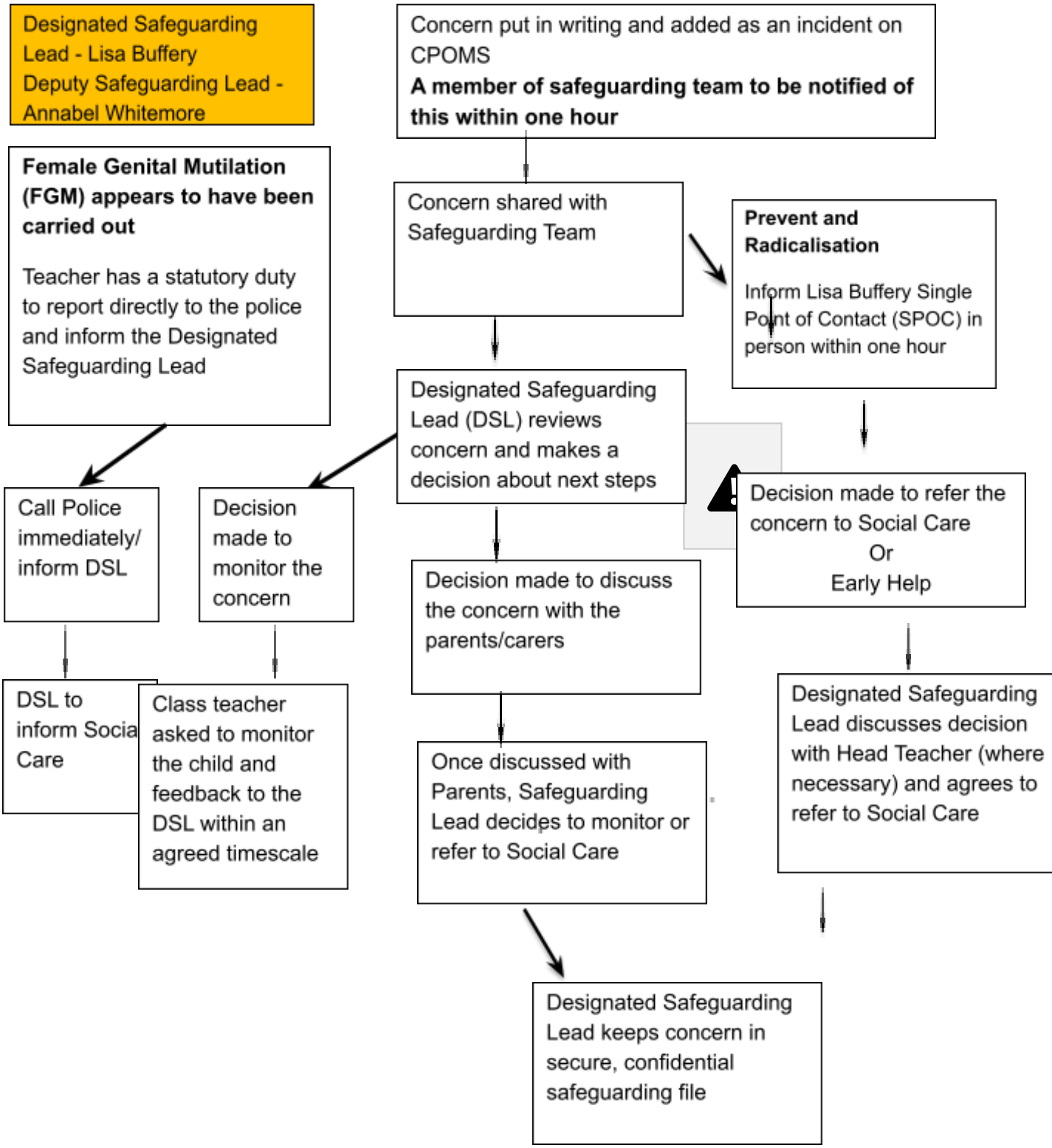
Further information, including the process for reporting and following up concerns, can be found in WAT's Concerns and Allegations Against Staff Policy.

3. **Responding to concerns about poor safeguarding practice**:

- If there are any issues or concerns about poor safeguarding practice (rather than abuse), it should be reported to the Headteacher who will manage it in line with the disciplinary policy.
- If the allegation of poor practice is about the Headteacher or a member of WAT's executive team (including where the Headteacher is the DSL), it should be reported to the CEO who will decide on whether disciplinary action should be taken and the next steps to take.
- If the allegation of poor safeguarding practice is about the CEO, then it should be reported to the Chair of Windsor Academy Trust's Board.
- The NSPCC's 'what you can do to report abuse dedicated helpline' is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285.
- Examples of poor safeguarding practice might include (but are not limited to), a leader not following up a disclosure from a child robustly or concerns that are raised being dismissed inappropriately.

Appendix 2 continued

Raising Concerns at: Manor Way Primary School

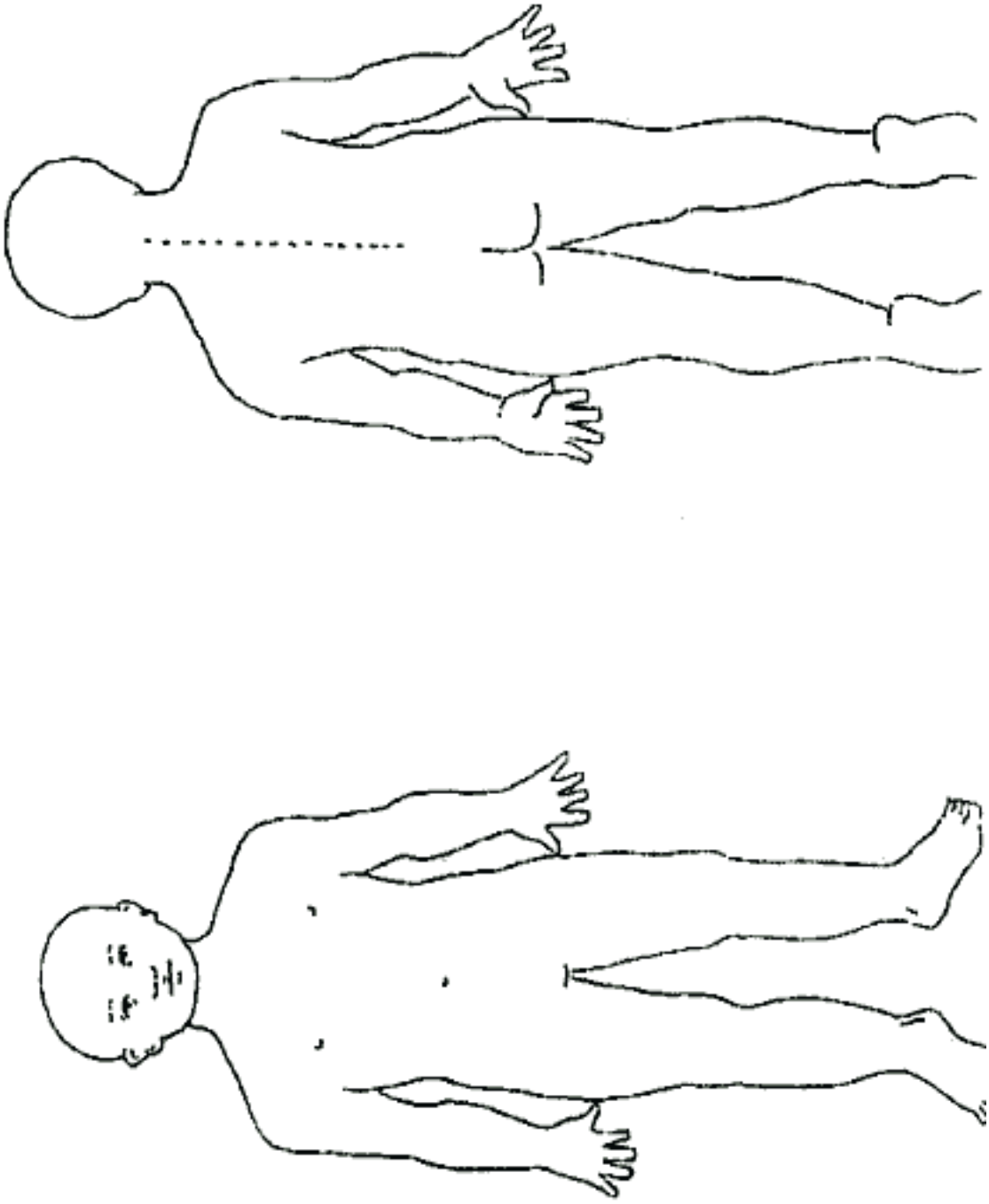


Appendix 3

Form for recording and reporting concerns about a child (double sided with body map)

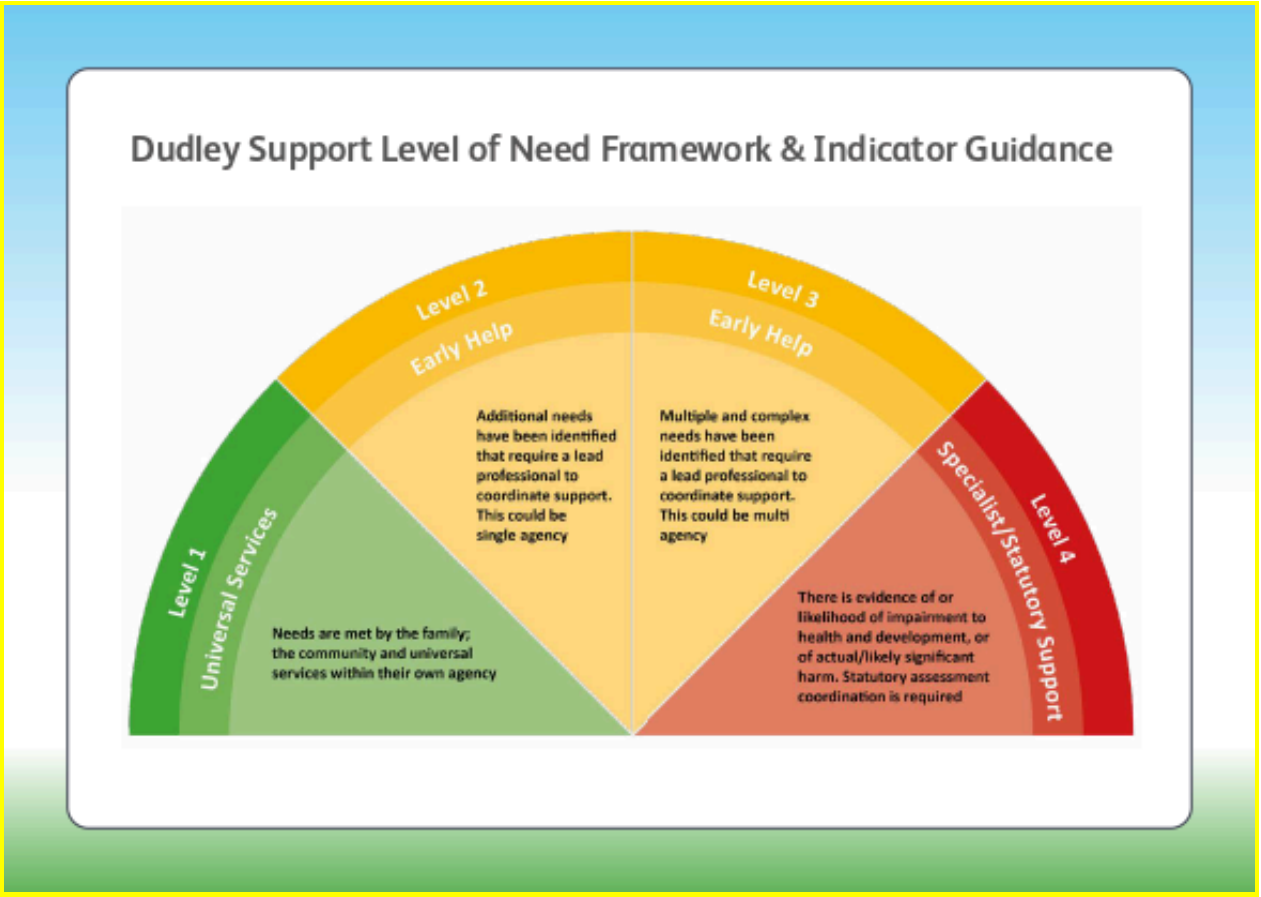
Form for recording and reporting concerns about a child		
Full name of child:	**Class:**	**Year:**
Date of birth (if known):		
Your name:	Position:	
Date and time of incident/disclosure/concern:		
Please provide details of the incident/disclosure/concern, including times, dates, description of injuries (body map included yes/no), and, if applicable, exact words spoken by the child (please continue on additional numbered pages if needed):		
Signed:	Time and date of reporting:	
Name of staff member reported to:	Further action taken by staff member:	
Signed:	Date:	
Any other information helpful for referral (**to be completed and discussed with pastoral team/ Designated Safeguarding Lead**). Include academic progress, attendance, behaviour, presentation, peer relationships and parental knowledge:		

Body Map



Appendix 4

Safeguarding Threshold/Continuum of Need



Summary of changes made to the Trust-wide safeguarding policy (from July 2019)

Changes made July 2019	
No.	**Change/s**
1	Details added regarding the arrangements for the new Trust-wide strategy for safeguarding
2	Trust members of staff/directors with responsibility for safeguarding named
3	Section added on serious violence as per changes to KCSIE 2019
4	Additional wording added to up skirting being a criminal offence as per changes to KCSIE 2019
5	Additional wording added on the use of the technology in the teaching safeguarding section. Terms content/contact/conduct also added as per changes to KCSIE 2019
6	Additional wording added to the teaching safeguarding section regarding the implementation of the Relationships and Sex Education guidance in September 2020 as per new wording in KCSIE 2019
7	Section added on multi-agency working and the safeguarding partners as per changes for KCSIE 2019

Changes made July 2020	
No.	**Change/s**
1	Peer review wording changed to take into account 'other DSLs' who may be involved in leading peer reviews in the future
2	More detailed guidance in relation to supply staff (KCSIE 2020 page 57)
3	Wording 'honour based violence and abuse' changed to 'honour based abuse' (KCSIE 2020)
4	Definition of safeguarding changed to include educational outcomes and mental health (KCSIE 2020 page 5)
5	The phrase 'and withhold' added to reflect changed wording in KCSIE regarding GDPR (KCSIE 2020 page 22/23)
6	'Including supply teachers' added for managing allegations
7	Name changed to 'RSE and Health Education' to reflect new statutory arrangements for 2021
8	Additional information added regarding domestic abuse: encompass process and helpline (KCSIE 2020 page 86)
9	Mental Health additional wording to meet KCSIE changes (KCSIE page 11)
10	Link added to the 'When to call the Police' document to support DSL decision making (KCSIE page 20)
11	Reporting guidance slightly adjusted to factor in use of CPOMS
12	Process for responding to allegations and suspicions 4th bullet added 'behaved or may have behaved they made not be suitable' to demonstrate transferable risk (KCSIE 2020 page 56)
13	Supply reference added to reflect the importance of direct school involvement for supply staff allegations (Page 57 KCSIE 2020)

Updates made January 2021	
No.	**Change/s**

1	KCSIE (updated December 2020) and Working Together to Safeguard Children (Updated January 2021). Brackets added to show that the updates have been considered in our policy and practices. *Please note – the changes to recruitment checks as a result of leaving the EU are not documented in this policy but have been enacted by HR leads.*
2	Julie Houlder added as the new Designated Director for Safeguarding
3	Stronger statement added in section 4.21 to take into account revised Working Together to Safeguard Children and emphasis on information sharing: 'The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. Information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.'
4	Homelessness section 16.21 updated to take into account the Working Together to Safeguard Children update (January 2021)

Updates made April 2021	
No.	**Change/s**
1	Additional wording to clarify definitions of sexual harassment and sexual violence. Some additional information about how DSLs can manage a process (taking from the 2018 DfE guidance). NSPCC number added and information about how we educate students.

Updates made July 2021		
No.	**Change/s**	**page no**
1	Wording added in principles to show the importance of considering a child's wishes and feelings, children will know how to report abuse and feel that it will be taken seriously, as well as our whole school approach to safeguarding.	2
2	Record keeping – added for records to be 'comprehensive, followed up upon, action taken, decisions reached and the outcome'	10
3	DSL 'Working with others' list updated in KCSIE and included in the list of responsibilities at the start of this policy.	12
4	Online safety referenced in regards to it being part of staff's ongoing safeguarding training.	16
5	Curriculum – reference added to the implementation of the new RSE and Health Education statutory requirements.	16
6	Serious Violence – Risk factor examples added as per KCSIE	21
7	Peer on Peer Abuse – Relevant wording added regarding sexual violence and harassment, online abuse and greater clarity regarding reporting.	22

8	Sexual Violence and Sexual Harassment – Revised section in line with KCSIE 2021 part 5 and the new DfE guidance 'Sexual violence and sexual harassment between children in schools'. Clear definitions, 0 tolerance approach and culture, reporting, recording, actions and support.	23-26
9	Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) - New information added about CCE and information regarding CSE refined to be aligned with KCSIE 2021	26-27
10	Modern Slavery – new section added to show what it includes and the national referral mechanism.	29
11	Elective Home Education (EHE) – new section added. Information about vulnerable children and need for multi-agency approach plus record keeping.	30
12	SEND – additional information in KCSIE about the vulnerability of SEND and additional barriers. Additional support and increased awareness.	30
13	Prevent – updated definitions from KCSIE added and link to Channel guidance added.	32-34
14	Online Safety – Commerce added as a fourth area of risk regarding online safety. Please also note that KCSIE now advises that schools should do an annual online safety review/audit.	36
15	County Lines – updated information added from KCSIE – specific indicators added and updated definition.	37

Updates made October 2021		
No.	**Change/s**	**page no**
1	Changes made to appendix 2 in line with the changes made to WAT's Concerns and Allegations of Abuse Against Staff Policy/KCSIE 2021. This now includes information about 'low level concerns' and also clearer information for raising concerns about poor safeguarding practice.	41 and 42

Updates made July 2022	
Change/s	**page no**
Section 1.3 - added 'professional curiosity' wording in safeguarding principles	Page 2
Section 4.6 - new section added to reflect the 'must' do safeguarding training for DSGs and the DDS at induction and through ongoing updates/training, as well as the 'must' for other LAB members and trustees to do training at induction. This reflects KCSIE 2022 para 81	Page 5
Section 4 - role of the DSL: Added 'professional curiosity' wording into role of DSL to reflect part 1 para 19 of KCSIE 2022. Also added two further bullets to stipulate DSL's role in training and updating staff, as well as keeping the LAB DSG updated in a manageable way. One bullet has been slightly adjusted to show that the DSL needs to be aware that children must have an appropriate adult during a	Page 11

section 47 and police investigations (PACE Code C 2019 statutory guidance) to reflect KCSIE 2022 annex c	
Section 10.4 New para in within curriculum to reflect approach to modern Britain and zero tolerance to certain views and behaviours. KCSIE 2022 para 130.	Page 16
Section16.6 – domestic abuse - phrases added to reflect that children who witness domestic violence are also victims. KCSIE 2022 – para 43. Also, Operation Encompass – new help and advice phone number for schools - info added from KCSIE 2022 annex b	Page 21
Section 16.7.2 – sexual violence and sexual harassment. Bullet added to ensure that children are informed that the law is there to protect them and not criminalise them. Another bullet added to show consideration of any sibling impact when there is an incident. KCSIE 2022 – para 468 and 462	Page 24
Section 16.7.7 – forced marriages – the following added to the end: The link to the Government forced marriage guidance 'The Right to Choose' and contact for the Forced Marriage Unit. KCSIE 2022 – annex b	Page 29
Section 16.19 – clear statement regarding providing information to parents about the challenges online and advice of how to keep children safe online, both at school and at home. A phrase added to demonstrate that the monitoring and filtering systems must be reviewed regularly. KCSIE 2022 para 132, 139 and 140	Page 36 and 37
Section 16.21 LGBT section sentence at the end of the section to reflect that LGBT pupils can be targeted and that a trusted adult should be available. KCSIE 2022 – para 202-204	Page 37
'Peer on Peer' wording is now changed to 'Child on Child' throughout the whole policy as per KCSIE 2022 – para 155	Throughout
'KCSIE 2022' changed to 'latest version of KCSIE'	Throughout

Updates made July 2023	
Change/s	**page no**
Section 4.2 - added DSL responsibility to include online safety and filtering and monitoring. Part 2 section 103 of KCSIE 2023.	Page 11
Section 16.7.2 - response to incidents of sexual harassment or violence: revsied wording under the first step 'manage internally' and wording of 'sanctions' added to reflect statutory guidance with a new section under 'Sanctions and the alleged perpetrator'.	Page 25/26
Section 16.9 - 'children missing in education' section - title changed to 'children who are absent from education' to reflect new KCSIE wording. Wording added about risks for children who are persistently absent and the link added to the DfE's statutory guidance for CME. Section 175 in KCSIE 2023.	Page 29/30
Section 16.11 - SEND hyperlinks added as per KCSIE guidance section 202.	Page 32
Section 16.19 - new wording added to online safety for filtering and monitoring to show that WAT adheres to the DfE filtering and monitoring standards, including an annual review, training for staff and a clear roles and responsibilities overview. Part 2 - section 124, 138 and 142 of KCSIE 2023.	Page 37
Section 16.27 - added on use of premises by external providers (e.g. holiday club for children). Section 167 and 377 of KCSIE 2023.	Page 39