



STAMFORD  
PARK TRUST

Stamford Park Trust

Keeping Children Safe in Education  
Safeguarding and Child Protection Policy

September 2024

<b>Policy Title:</b>	Safeguarding and Child Protection Policy
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<b>Legal Framework/Statutory Guidance:</b>	See section 1.5 and Appendix 3

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# 1 Part A

## 1.1 Application

This Safeguarding Policy & Procedures contains the Policy and Procedures for Safeguarding and Child Protection for Stamford Park Trust, in accordance with DfE statutory guidance and regulations and current legislation (see appendix).

It applies to Stamford Park Trust as a whole and to all the academies and service units in the Trust; all paid and unpaid staff, volunteers, governors and Trustees of the Trust and its academies, and all contractors and other people using or visiting any of the premises of the Trust or its academies, must abide by this Safeguarding Policy.

This Policy is subject to the Trust's Scheme of Delegation for Governance Functions. If there is any ambiguity or conflict then the Scheme of Delegation and any specific alteration or restriction to the Scheme approved by the SPT Board of Trustees takes precedence.

It is the responsibility of the Local Governing Body and Head of each academy/college within Stamford Park Trust to ensure that their academy and its staff and visitors adhere to this policy. It is the responsibility of the Stamford Park Trust CEO and Executive Team to ensure that the Trust Central Team and its staff and visitors adhere to this policy.

Our students' welfare is our paramount concern. The governing body will ensure that all establishments within Stamford Park Trust will safeguard and promote the welfare of students and work together with other agencies to ensure that we have adequate arrangements to identify, assess and support those children who are suffering or likely to suffer harm. At Stamford Park Trust we are a community and all those directly connected i.e. staff members, governors, volunteers, parents, families and students, have an essential role to play in making it safe and secure.

The central purpose of Stamford Park Trust is to transform communities so that they are safe and healthy places to be and to live. As a Multi-Academy Trust, we realise that we cannot make a commitment of this kind without first being committed to the safeguarding and safekeeping of our students. This safeguarding and child protection policy is intended for use across all academies and colleges that are part of Stamford Park Trust.

This policy should be followed and adhered to in all situations and circumstances when the safety of our children is at stake.

In implementing this policy all staff and governors / trustees must take account of any advice given to them by the CEO and the Designated Safeguarding Leads and/or the Board of Trustees.

If there is any question or doubt about the interpretation or implementation of this Policy the SPT CEO should be consulted.

## 1.2 Monitoring arrangements

This policy will be reviewed annually by the SPT Pastoral and Safeguarding Group and the SPT Executive Team. At every review, it will be approved by the Board of Trustees of Stamford Park Trust.

### 1.3 Approval and review

- Maintenance of this Policy is the responsibility of the CEO of SPT.
- This Policy was approved by the Board of Trustees on:
- This Policy is due for annual review by: September 2025 (or before if updates are released)

### 1.4 Associated policies and procedures

The following policies are directly related to and complement this Safeguarding Policy & Procedures:

- Academy and College Behaviour Policy and Procedures
- Academy and College Attendance Policy
- Relationships and sex education policy (Secondary academies only)
- Medicines in school policy (Secondary academies only)
- Anti-bullying policy
- E-Safety policy
- Trust ICT Acceptable Use Policy
- Allegations of Abuse Against Staff
- Educational Trips and Visits policy and procedures
- Equality Scheme objectives
- Fitness to Study policy (College only)
- Mental Health and Wellbeing policy
- Health and Safety Policy and Procedures
- Information Security Policy, Data Protection and Data Retention Policy
- Complaints Policies and Procedures
- Staff, Student and Governors Codes of Conduct
- Recruitment and Selection policy
- Disciplinary policies and procedures
- Whistle-blowing Policy.
- Low Level Concern (LLC) procedure for staff

### 1.5 Legal Framework (See Appendix 1)

This Policy will have consideration for, and be in compliance with the following legislation and statutory guidance:

#### 1.5.1 Legislation:

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education (Health Standards) (England) Regulations 2003
- Safeguarding Vulnerable Groups Act 2006
- Academy Staffing (England) Regulations 2009, as amended
- Equality Act 2010
- Protection of Freedoms Act 2012
- The Education (Academy Teachers 'Appraisal) (England) Regulations 2012(as amended)
- The Children and Families Act 2014
- The Safeguarding and Human Rights Act 1998
- The Sexual Offences Act 2003
- Public Sector Equality Duty
- Inspecting safeguarding in maintained schools and academies, September 2022 (Ofsted)

- Inspecting safeguarding in safeguarding in early years, education and skills settings, September 2022, Ofsted
- Mental Health & Behaviour in Academics (2018) DfE

### 1.5.2 Statutory Guidance

- **DfE (2024) Keeping Children Safe in Education**
- GOV.UK (2020) Sharing nudes and semi-nudes; advice for education settings working with children and young people.
- DfE (2023) Working Together to Safeguard Children
- DfE (2018) Sexual violence and sexual harassment between children in academies and colleges
- Home Office (2018) Criminal Exploitation of children and vulnerable adults: County Lines guidance
- HM Gov (2018) Working Together to Safeguard Children
- DfE (2015) What to do if you are worried about a child being abused
- DfE (2015) Information sharing advice for safeguarding practitioners
- DfE (2015) Disqualification under the Childcare Act 2006
- DfE (2015) “The Prevent duty”: Departmental advice for academies and childcare providers
- Multi-agency Statutory Guidance on Female Genital Mutilation, July 2020, HM Government.
- Prevent Duty Guidance for England & Wales, April 2021, Home Office.
- DfE Data protection in Schools

### 1.5.3 Local Guidance

- Local Authority Levels of Need Threshold Guidance 2024
- Signs of Safety
- Early Help Assessment Neglect- Graded Care Profile
- Tameside Guidance for Academies for Dealing with knife crime and weapons found on academy premises (2020)

## 1.6 Important Contacts

Role/Organisation	Name	Contact Details
Trust CEO	Anton McGrath	<a href="mailto:a.j.mcgrath@spt.ac.uk">a.j.mcgrath@spt.ac.uk</a>
Chair of Trustees	Stephen Foote	c/o <a href="mailto:c.j.haigh@spt.ac.uk">c.j.haigh@spt.ac.uk</a>
Nominated Trustees for Safeguarding & Child Protection	Stephen Foote	c/o <a href="mailto:c.j.haigh@spt.ac.uk">c.j.haigh@spt.ac.uk</a>
Trust Head of Human Resources		

## 2 Part B – Policy

### 2.1 Principles

The Board of Trustees of Stamford Park Trust places the highest importance on its duty to safeguard and promote the welfare and safety of all children in its care.

Stamford Park Trust believes that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play. The Trust is committed to safeguarding and promoting the welfare of children by the provision of a safe environment in which everyone can learn. All people working with children and visiting any of the trust premises must be aware that children may be at risk of harm or abuse, are well placed to observe signs of abuse, have a duty to protect children from harm and abuse, and have a responsibility to identify and report child welfare concerns and take appropriate action, acting on concerns about a child's welfare immediately, in association with other Trust staff and volunteers, visitors, families and other agencies.

At Stamford Park Trust, we believe that we should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual student. We recognise the importance of providing an environment within our settings that will help children feel safe and respected. We recognise the importance of enabling children to talk openly and feel confident that they will be listened to. We recognise that all adults in our trust have a full and active part to play in protecting our students from harm. We will work with families and our students to build an understanding of our responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations is at the heart of what we do

All Trust staff and volunteers have a responsibility to provide a safe environment in which children can learn and should make sure their approach is child-centered. This means that they should consider, at all times, what is in the best interests of the child and fulfil their legal responsibilities to identify children who may need early help or who are suffering, or are likely to suffer, significant harm. Early help is defined as support for children of all ages that improves a family resilience and outcomes or reduces the chance of a problem getting worse.

The Trust recognises that all its academies and colleges also play a crucial role in preventative education. This is in the context of a whole-academy approach to preparing students for life in modern Britain, and a culture of zero tolerance of any forms of discrimination against all of the protected characteristics and any forms of sexual violence and harassment. This will be underpinned by the academies':

- Behaviour policy and procedures
- Pastoral support system
- Planned programme of relationships, sex and health education, which is inclusive and delivered regularly in age appropriate context

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

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, **whether that is within or outside the home, including online** (this last part has been added)
- Preventing the impairment of children's mental and physical health or development
- Making sure 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

Children includes everyone under the age of 18 (Education Act 2002 and Children Act 1989).

The Trust and its academies will recognise that some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed



to anti-discriminatory practice and recognise children's diverse circumstances. We will ensure that all children have the same protection, regardless of any barriers they may face.

Our academies recognise that some children are living in circumstances that may make them more vulnerable to abuse, neglect, or poor outcomes. Some may need early help or intervention from other organisations in order to overcome problems and keep them safe. It is important to remember that each academy should follow the guidance of their local multi-agency safeguarding hubs (MASH) and implement their systems and protocol for referring families for early help and reporting child protection concerns. The relevant MASH will ensure that each academy is aware of issues within the community that are relevant to them. DSL's should ensure that all staff are aware of those issues and systems for reporting and provide local safeguarding updates.

The Trust and its academies will give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are Children in Care
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from academy to be home educated
- Have experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- Has a parent or carer in custody or is affected by parental offending
- Is frequently missing/goes missing from education, home or care

The Trust and its academies will ensure that students feel safe and comfortable to come forward and report any concerns and/or allegations through:

- Having systems in place for students to confidently report abuse and ensuring that their views are taken into account
- Ensuring reporting systems are well promoted, easily understood and easily accessible for students
- Making it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

The Trust and its academies recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under the behaviour policy, but this safeguarding and child protection policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the academy at risk

- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

This Policy and Procedures also apply to extended academy and off-site activities.

## 2.2 Organisational Scope

Our policy applies to all staff, including supply staff, trustees governors and volunteers working within our academies and across our Trust. There are six main elements:

- a) Ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with children.
- b) Raising awareness of child protection issues and equipping children with the skills needed to keep themselves safe.
- c) Ensuring that staff are aware of the procedures for identifying and reporting cases, or suspected cases, of abuse, neglect and exploitation
- d) Ensuring staff are able to recognise and report any issues that might be a cause for concern within the Early Help and CIN framework to ensure early identification and the prevention of escalation of concerns.
- e) Supporting students who have been abused, neglected or exploited in accordance with their agreed protection plan; and establishing a safe environment in which children can learn and develop.
- f) To work in partnership with other agencies to safeguard children.

Safeguarding covers more than the contribution made to child protection in relation to individual children. It also encompasses issues such as:

- Staff and student conduct
- Health and safety
- Bullying
- Child-on-Child Abuse
- Sexually harmful behavior
- Online safety, including filtering and monitoring
- Building security
- Alcohol, drugs, and substance misuse
- Behaviour management and physical intervention and restraint (reasonable force)

## 2.3 Record Keeping

Accurate electronic records, via the academies' electronic monitoring systems, will be kept of all 'notes of concerns' relating to individual students and any contact/discussions/meetings made with students, parents, staff or outside agencies.

We will:

- Ensure an individual file is created as necessary for children with Safeguarding concerns.
- Maintain a chronology of significant incidents for each child with safeguarding concerns, via the electronic platform.
- Ensure such records are kept confidentially and securely and separate from the child's educational record.

Information will be shared with other agencies as appropriate. Parental consent will normally be sought before making a referral to Children's Social Care, unless there is reason to suspect that doing so might place the student or a member of staff at further risk.

Child protection records are not open to students or parents. Child protection records are securely kept by the Designated Safeguarding Lead separately from educational records, and can only be accessed by the Head and key members of the safeguarding team.

What may appear to be a less serious matter should also be recorded as a 'cause for concern' as referrals may subsequently show a pattern of concerns or form part of the history of any subsequent CP case.

When a child leaves our one of our 11-16 educational establishments, the DSL will contact DSL at the new educational establishment and will ensure that the child protection file is forwarded to them in an appropriately agreed manner. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving educational establishment and/or evidence of recorded delivery.

## 2.4 Inter-Agency Working and information sharing

We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the Police and Children's Social Care for enquires under section 47 of the Children Act 1989. Early help is defined as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

The academy will keep updated on all National and Locality guidance. The academy will make referrals to the appropriate Early Help Access Point to access services or consult with professionals. The academy leads on the 'Team Around the Academy' process to secure support for families and ensures Early Help Assessments are completed where appropriate.

If a young person is at risk of significant harm, the Safeguarding Team will refer to the appropriate MASH (Multi Agency Safeguarding Hub) or for Early Help they will refer to the Early Help Access Point via the appropriate local authority.

We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

We will participate in serious case reviews, other reviews and file audits as and when required to do so by the local authority Safeguarding Children Partnership.

We will Cooperate with Children's' Social Care for enquiries under Section 47 of the Children Act 1989. Attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other safeguarding meetings as required.

We will liaise with other agencies working with the child, share information as appropriate and contribute to assessments. As a academy we will work in partnership with local agencies and seek services provided by the local Safeguarding Children's Board to safeguard, support and refer our students to other services where appropriate.

We will follow the principles and procedures as outlined the DfE Working Together 2019 document.

## 2.5 Safer Recruitment

All staff will be subjected to safeguarding checks in line with the statutory guidance Keeping Children Safe in Education: Statutory Guidance for Educational Establishments and Colleges, September 2023.

We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy. We will also ensure that any agency worker presenting for work is the same person on whom the checks have been made.

Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

The trust acts reasonably in making decisions about the suitability of any prospective employee based on checks and evidence including: criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in our Trust.

For all appointments, an enhanced DBS check with barred list information will be appropriate as the majority of staff will be engaging in regulated activity. A person will be considered to be in 'regulated activity' if as a result of their work they:

- will be responsible, on a regular basis, in any setting for the care or supervision of children; or
- will carry out paid, or unsupervised unpaid, work regularly in academy where that work provides an opportunity for contact with children.
- engage in intimate or personal care or overnight activity, even if this happens only once. An offer of appointment to a successful candidate, including one who has lived or worked abroad, must be conditional upon satisfactory completion of:
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then we will follow advice on the GOV.UK website
- if the person has lived or worked outside the UK we will make any further checks the academy considers appropriate;
- verify professional qualifications, as appropriate.
- verify a candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available
- obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity
- obtain a separate barred list check (what was list 99) if an individual will start work in regulated activity before the DBS certificate is available
- check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role

## 2.6 Employment History and References

As a Trust we will always ask for written information about previous employment history and check that information is not contradictory or incomplete. If a candidate for a teaching post is not currently employed as a teacher, we will check with the academy, college or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

Any information about past disciplinary action or allegations will be considered carefully when assessing an applicant's suitability for the post (including information obtained from the Employer Access Online checks referred to previously).

In addition, we will:

- Ensure that all our adverts include a statement which explains our commitment to safeguarding children
- Display our commitment to safeguarding both visually in our building and on our website
- Ensure that all our posts are detailed accurately through specific job descriptions and person specifications which state the contact that the post-holder will have with children
- Discard any applications that are made by any applicant who submit a CV instead of the required application form
- Ask specific questions during the interview that relate to safeguarding children.
- Discuss any self-declared information with the candidate in a non-prejudicial way during the interview
- Reserve the right to call candidates back for further questioning if anything emerges either through the DBS process or late references.
- Reserve the right to dismiss a candidate if false information has been submitted during the recruitment process or if information comes to light that the candidate failed to disclose
- Ensure a member staff trained in safer recruitment will be part of the short listing and interview process.
- Ensure all shortlisted candidates are informed if we carry out online searches as part of due diligence checks.
- Ensure all gaps in employment history are checked including any periods of working abroad. Police checks will also be conducted for anyone who has not been employed in this country prior to being offered employment

## 2.7 Single Central Record

Stamford Park Trust keeps a single central record. The single central record covers the following people:

- All staff (including supply staff) who work at the Trust and all others who work in regular contact with children in the academies/college, including volunteers.

Stamford Park Trust does not hold DBS certificates on file in order to fulfil the duty of maintaining the single central record. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications are kept for the personnel file.

The information that must be recorded in respect of staff members (including teacher trainees on salaried routes) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check
- a barred list check
- an enhanced DBS check/certificate
- a prohibition from teaching check
- further checks on people living or working outside the UK
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

**We have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.**

### 2.7.1 Agency and Third-party Staff

Stamford Park Trust must obtain written notification from any agency, or third-party organisation we use that the organisation has carried out the checks (in respect of the enhanced DBS certificate that written notification has been received that confirms the certificate has been obtained by the academy, on an individual who will be working at the academy, that the academy would otherwise perform. Where the position requires a barred list check this must be obtained, by the agency or third-party prior to appointing that individual. The academy must also check that the person presenting themselves for work is the same person on whom the checks have been made.

Where applicants for initial teacher training are salaried by the academy, the academy must ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including and barred list information) must be obtained.

For supply staff, academies/colleges should also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.

### 2.7.2 Trainee / Student Teachers

Where applicants for initial teacher training are salaried by the Trust, the Trust will ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including and barred list information) must be obtained.

Where trainee teachers are fee-funded it is the responsibility of the initial teacher training provider to carry out the necessary checks, academies should obtain written confirmation from the training provider that these checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. The academy will record details of fee-funded trainees DBS on the single central record.

### 2.7.3 Volunteers

Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. For new volunteers in regulated activity who will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis we will obtain an enhanced DBS certificate with barred list check.

Where checks are carried out on volunteers, academies/colleges should record this on the single central record.

### 2.7.4 Trustees and Local Governors

Trustees and Local Governors, who are volunteers, will be treated on the same basis as other volunteers, that is, an enhanced DBS check with barred list check will only be requested if the governor will be engaged in regulated activity.

### 2.7.5 Contractors

Stamford Park Trust has arrangements in place with contractors to make sure that the contractor, or any employee of the contractor, working at the academy has been subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some

type of care for or supervision of children regularly). Contractors and contractors' employees for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children.

We will always check the identity of contractors and their staff on arrival at any site within our Trust.

### 2.7.6 Off Site Learning and Alternative Provision

Some students in our academies will be offered opportunities for work-based learning. These opportunities will be made available through:

- Day Release programmes
- Alternative Curriculum Provision
- Work Experience Placements

We contract local Colleges, training providers and support agencies to place students on work experience and alternative learning programmes. In the Colleges their recruitment, selection and pre-employment vetting is regulated in accordance with Part 3 of the document 'Keeping Children Safe in Education' – 'Statutory Guidance for Academies and Colleges September 2023.

When students are placed on work experience placements, we will ensure that policies and procedures are in place to protect children from harm. The school will only place a student in alternative provision if the placement meets the needs of the student and all safeguarding checks are in place and the placement is compliant.

If we have any safeguarding concerns regarding a student that is an off-site learner, the health and safety risk will be assessed by the Safeguarding Lead. If it is deemed that the provider needs further information, it is the responsibility of the Safeguarding Lead to inform the Safeguarding lead within the contracted establishment so as they can manage the risk.

The school will continue to be responsible for the safeguarding of any pupil attending alternative provision.

### 2.7.7 Organisations or Individuals using school premises

Any organisation hiring or renting out the school/college facilities will have to satisfy the Trust that that appropriate arrangements are in place to keep children safe, including having an appropriate safeguarding and child protection policy and procedure in place. The Trust will ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Academies 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, the academy will follow their safeguarding policies and procedures, including informing the LADO.

When services or activities are provided under the direct supervision or management of school or college staff, their arrangements for child protection will apply.

This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college.

<https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings>

## 2.8 Partnership with Parents/Carers

We are committed to working with parents/carers positively, openly and honestly. We ensure that all parents/carers are treated with respect, dignity and courtesy. We respect parents/carers' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to protect a child.

Any referral made to Children's Services is shared with parents/carers beforehand unless it is inappropriate to do so.

Children will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why.

We will always endeavour to preserve the privacy, dignity and right to confidentiality of the child and parents/carers. The Designated Safeguarding Lead (DSL) will determine which members of staff need to know personal information and what they need to know for the purpose of supporting and protecting the child.

**Parents/carers will NOT be consulted before a referral to Social Care if a child discloses any of the following information;**

- Where sexual abuse or sexual exploitation is suspected.
- Where organised or multiple abuse is suspected.
- Where fabricated or induced illness is suspected.
- Where planned or actual female genital mutilation is suspected.
- Where contacting parents/carers would place a child, the parent or others at immediate risk.
- Where there are concerns over possible forced marriage – at home or abroad.

Staff **MUST NOT** discuss their concerns on any of the above matters with parents /carers. Staff **MUST** report this directly to the Designated Safeguarding Lead (DSL)

Stamford Park Trust and its establishments recognises it is an agent of referral and not of investigation.

## 2.9 Mental Health and Wellbeing

Stamford Park Trust has an important role in supporting the mental health and wellbeing, as well as physical health of our students.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Academy staff record concerns onto the appropriate electronic monitoring system for any concerns relating to mental health and a triage assessment is completed with the student by the Mental Health Lead, to ensure timely and effective support – if there are risks reported the Safeguarding Team consult with, and refer to the relevant external service, for example CAHMS. The academies work within a family approach framework to ensure safety and manage risk. The Mental Health Lead will keep a Mental Health and Wellbeing record up to date, that will record concerns as an overview, as well as actions and will be a review process.



The Mental Health Lead and members of the safeguarding team have access to regular named Clinical Supervision from an appropriate body.

All staff are aware of signs of concern to look out for, related to mental health. Staff will access CPD in this area and can have low level wellbeing conversations with students, and escalate to the Mental Health Lead/DSL if there are concerns.

There a number of staff working across the Trust who have been trained as Mental Health First aiders.

Staff will only observe and never diagnose.

Children can self-refer to access support. Families can also refer in request and access support for mental health and wellbeing. Children will access comprehensive resources and sessions in their curriculum sessions on mental health, as well the wide range of other health/safety related topics covered, as well as designated assemblies.

## 2.10 Cybersecurity, IT Policies and Site Security including Filtering and Monitoring

All staff members have a responsibility for reporting concerns that may come to light and ensure our buildings and grounds are secure.

We check the identity of all visitors and volunteers coming into our academy. Visitors are expected to sign in and out electronically. All visitors are given an identification badge attached to a lanyard to be worn around the neck. There is a colour coding system in operation. A green lanyard means the individual has had the appropriate safety checks and are permitted to engage with students without supervision. A red lanyard is for visitors to academy who have not had the appropriate safety checks and consequently must be supervised at all times around children. Any individual who is not known or identifiable will be challenged for clarification and reassurance. All staff have to wear a academy/college/Trust ID badge and lanyard when on site.

Stamford Park Trust will not accept the behaviour of any individual, parent or anyone else that threatens academy security or leads others i.e. a child or adult to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the site.

The main entrance for visitors is a locked door which requires a staff ID badge to gain entry.

At Stamford Park Trust promoting safe internet use both at home and at school/college is vitally important. We ensure that children are kept safe from terrorist and extremist material, filtering is in place to block and report unsuitable websites.

ICT support staff produces a report of suspicious internet searches/activity, and these are reported as a concern to the Designated Safeguarding Lead.

All staff and students have to sign an ICT acceptable use agreement when they start.

## 2.11 Filtering and monitoring

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, SPT and its academies will do all they reasonably can to limit children's exposure to the risks from the school's or college's IT system.

As part of this process, every academy has appropriate filtering and monitoring systems in place which are regularly reviewed for their effectiveness. All staff have an awareness and understanding of the provisions

in place in relation to filtering and monitoring, including how to manage them effectively and how to escalate concerns when identified.

In fulfilling this responsibility SPT will consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

SPT will endeavor to fulfill the Department for Education filtering and monitoring standards, which set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and students and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. SPT will carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks our children face.

## 2.12 Safeguarding and Social Media use by Academy Staff

There are legitimate activities when employees can use social media on the internet as part of their work, however they must do so appropriately, in line with these guidelines and the Trust values. These guidelines are to protect you and the reputation of the Trust. They are not meant to restrict your work or personal use of what is an important method of communication and engagement.

The Trust respects an employee's right to a private life. However, they must also ensure that confidentiality and the reputation of the Trust are protected. Even if your social media activities take place outside of work, what you say can have an influence on your ability to conduct your job responsibilities, your work colleagues' abilities to do their jobs, the business and reputation of the Trust.

Your personal activities must not undermine the Trust's reputation, your professional reputation, or create perceptions of impropriety in the Trust, or bring the Trust in to disrepute.

Communication with children and parents/carers must only take place using your official email address and all communication should remain professional at all times.

### **Guidelines for staff:**

- Do not allow current students to be listed as friends on your personal social networking sites. This is to safeguard everyone involved as it can be left open to allegations.
- Be mindful of accepting ex-students or parents as friends on social networking sites, as a Trust we advise that this should not be until the person turns 18. Remember they may have friends or family still in the trust who may gain access to your social networking sites. You might also allow them access to colleagues' profiles. We strongly recommend that where possible you avoid befriending them.
- Be careful when writing comments on social media profiles that could potentially bring the Trust's reputation into disrepute.
- Speak to the Principal/Head of School or DSL if you are concerned by something you see on social media or if a parent or student tries to make contact/add you on social media.

## 2.13 Definitions and Terminology

### 2.13.1 Definitions

- **Safeguarding** and promoting the welfare of children means:
  - 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
- **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
- **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm, including where they see, hear or experience its effects in relation to domestic abuse Appendix 1 explains the different types of abuse.
- **Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.
- **Sharing of nudes** and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.
- **Children** includes everyone under the age of 18.
- The following **three safeguarding partners** are identified in Keeping Children Safe in Education. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
  - The local authority (LA)
  - A clinical commissioning group for an area within the LA
  - The chief officer of police for a police area in the LA area
- This policy is consistent with the procedures of the three safeguarding partners.
- **Alleged Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse or exploitation considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- **Alleged perpetrator(s) and perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what’s appropriate and which terms to use on a
  - case-by-case basis

### 2.13.2 Terminology

- **The Trust** means Stamford Park Trust (SPT).
- **Academy** means an academy or college within Stamford Park Trust.

- **CEO** means the chief executive officer of Stamford Park Trust.
- **Trust Central Team** means all staff employed to work across the trust academies/colleges/establishments, such as the Executive Principal, Chief Operating Officer and the central departments of marketing, finance and HR.
- **Head** means the Head of Academy or Centre Principal of the college.
- **Governors and Trustees** includes governors, Trustees, non-governor members of Trust Committees and members of the Trust Panel and are covered by the category of 'staff' unless explicitly stated.
- **Local Governing Body** means the committee of the Board of Trustees to which Trustees have delegated appropriate powers and functions relating to the governance of the academy.
- **Staff** means paid and unpaid staff with a contract of employment with the Trust.
- **Volunteer** means volunteers working in Trust premises or with children on the roll of a Trust academy under some form of agreement with the Trust or academy; volunteers are covered by the category of 'staff' unless explicitly stated.
- **Visitors** means casual visitors to and users of the Trust premises, including people working with children on a voluntary basis not covered by the category of formal 'volunteer'.
- **Contractors** means people working in Trust premises under a formal contract with an external organisation.

For services, functions and staff of the Trust that are not contained within an academy budget and/or are not the responsibility of a Head and/or Governing Body, references to 'academy' should also be read as 'the Trust Central Team' and 'Head' should be read as the 'SPT CEO' and SPT Executive Principal.

## 2.14 Roles and Responsibilities

### 2.14.1 The Board of Trustees

The Board of Trustees will:

- Have strategic responsibility and oversight of Safeguarding across Stamford Park Trust
- Work with the CEO and Trust Executive Team to ensure that safeguarding is central to the Trust's strategy and development plans
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the CEO ultimately to account for its implementation, and to Head and Local Governing Bodies for its implementation within SPT academies
- Ensure there is an annual review and approval cycle of safeguarding policies and procedures
- Be informed of all statutory guidance, complete all required safeguarding training and be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements.
- Appoint a Link Trustee to monitor the effectiveness of this policy in conjunction with the full Board of Trustees.
- Facilitate a Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Ensure that Local Governing Bodies, acting as committees of the Board of Trustees are supported to fulfil their role.

- Receive and consider reports from the CEO / DSL / Link Trustee relating to significant safeguarding concerns, actions, trends and outcomes.
- Receive the annual safeguarding report for the Trust, and note any actions arising from it.
- Receive any concerns from local governing bodies and act on them accordingly.

### 2.14.2 Local Governing Bodies

The Local Governing Body of each academy in SPT, in their role as delegated committees of the Board of Trustees, will:

- Have oversight of the safeguarding arrangements of their academy(s) within the Trust
- Complete safeguarding training in line with the current version of Keeping Children Safe in Education.
- Appoint a Link Governor for safeguarding who will meet with the academy DSL to review process and procedure and report to the Local Governing Body.
- Receive and consider reports from the Head / DSL / Link Governor relating to significant safeguarding concerns, actions, trends and outcomes.
- Receive the annual safeguarding report for their academy, and note any actions arising from it.
- Refer any concerns with regard to safeguarding to the SPT Board of Trustees.

### 2.14.3 The CEO

The SPT CEO is responsible for ensuring that this policy is adhered to across all academies and by Trust Central Team. The SPT CEO will:

- Ensure that the Scheme of Delegation is clear around the responsibilities for safeguarding at all levels.
- Report significant safeguarding concerns to the Chair of the Board of Trustees and / or the Link Trustee for Safeguarding.
- Commission external challenge and support where appropriate to ensure the Trust is meeting its statutory responsibilities in respect of safeguarding and promoting the welfare of children.
- Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer of the Trust Central Team or a Head
- Make decisions on all low-level concerns regarding members of staff or volunteers of the Trust Central Team or Heads
- The Trust Shared Single Central Record is maintained and accurate, spot checks may be delegated to the DSL if appropriate.

The CEO may delegate as appropriate to the appropriate DSL or DDSL.

### 2.14.4 The Executive Principal/Head

The Executive Principal/ Head of each academy will ensure that:

- Staff (including temporary staff) and volunteers, are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation
- The DSL and other staff undertake appropriate safeguarding and child protection training.
- At least one member of an appointed recruitment panel will have undertaken appropriate safer recruitment training.
- The DSL is keeping up to date records of staff training.
- The academies' Single Central Record is maintained and accurate, spot checks may be delegated to the DSL if appropriate.

- This policy is communicated to parents/carers when their child joins the academy and via the academy website.
- The DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Online safety is a running and interrelated theme within the whole-academy approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- The academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). See LLC for staff procedure
- They act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- They make decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this and where appropriate the Executive Principal
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the academy roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the academy about safeguarding arrangements, where appropriate
- Safeguarding requirements are a condition of using the academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The DSL is ensuring accurate records are kept within the child protection online monitoring system (CPOMS)
- The relevant staffing ratios are met, where applicable
- A designated teacher is in place to support the educational achievement of children in care
- An annual safeguarding report is prepared and presented to the Local Governing Body
- Students are taught about safeguarding within the curriculum in compliance with statutory guidelines.

#### 2.14.5 The Academy/College Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

The Academy/College Designated Safeguarding Lead (DSL) will be a member of the academy senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the academy.

During term time, the DSL and DDSL will be available during academy hours 8am – 4pm for staff to discuss any safeguarding concerns. The DSL can also be contacted out of academy hours if necessary using the details provided in the key contacts appendix. When the DSL is absent, the Deputy DSL will act as cover. In an emergency and during holiday periods please refer to the key contacts listed in the appendix.

The DSL and DDSL will:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place
- Provide advice and support to other staff on child welfare and child protection matters and keep the Head informed of any issues
- Ensure that all staff undertake appropriate safeguarding and child protection training, through safeguarding updates and regular CPD
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Ensure accurate records are kept within the child protection online monitoring system
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the academies' policies.
- Ensure the successful transfer of the safeguarding/child protection file when a learner moves to a new setting within 5 days of transfer or the first 5 days of the start of a new term.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Inform the head of any enquiries under section 47 of the children's act and any police investigations. This includes the awareness of the requirement that all children have an appropriate adult to support and help them in the case of a police investigation or search
- Take the lead and responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that learners are experiencing or have experienced and identifying the impact that these issues may have on student's attendance, engagement and achievement.
- Ensure there is appropriate safeguarding cover during term time including out of hours activities run by the setting.

The full responsibilities of the DSL and Deputy DSL are set out in their job description

#### 2.14.6 All Staff

All staff across SPT will recognise that safeguarding and promoting the welfare of children is everyone's responsibility and:

- Each year, read and understand part 1 and annex A. of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#). Staff who work directly with children will also read annex B.
- Sign a declaration at the beginning of each academic year / start of employment to say that they have reviewed and understood the KCSIE guidance, the Trust Safeguarding and Child Protection Policy
- Complete all prescribed safeguarding and child protection CPD, including those on online safety

All staff will ensure that they understand:

- The academy and Trust systems which support safeguarding, including this Safeguarding and Child Protection Policy, and any local procedures according to their place of work.
- The SPT Staff Code of Conduct,
- The role and identity of the designated safeguarding lead (DSL) and [deputy/deputies] of either the academy (Academy Staff) or the Trust (Trust Central Team)
- The Behaviour Policy and Behaviour Procedures as relevant to their place of work
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- DSL/DDSL must keep written records of all concerns, discussions and decisions, including the rationale for those decisions, this should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program.
- The expectations, applicable roles and responsibilities in relation to filtering and monitoring
- The online safety policy and their role within this, including in relation to filtering and monitoring



- What to do if they identify a safeguarding issue or a child tells them they are being abused/neglected or exploited, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality
- The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- How to identify vulnerable learners and what action to take to keep them safe, including learners who may benefit from early help intervention
- How to ensure that information or concerns about learners will be shared with the DSL, including recording concerns appropriately and in a timely manner using the online child protection system.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at academy and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or gender questioning (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection

### 2.14.7 Filtering and Monitoring responsibilities

The academy IT team will always log a student filtering and monitoring concern onto the appropriate safeguarding reporting platform (CPOMS/CEDAR) under the sub-heading of filtering and monitoring. For any staff concerns regarding filtering and monitoring the IT team will raise these via email to the DSL team and Head of Centre

All staff will be familiar with the types of filtering and monitoring systems in place and how to escalate concerns via the appropriate safeguarding reporting platform (CPOMS/CEDAR)

All staff are responsible for flagging any online safety concerns to the IT technician team and DSL through the appropriate online system, this might be something that a student has accessed during a lesson or something that has been seen during unstructured times or when using the library/LRC.

For teaching and learning purposes, staff are able to request to have a particular website unblocked. This request must be made in writing via the IT help desk email and include the name of the website and the specific educational purpose required. The IT technician team will discuss any requests with a member of the DSL team/ Head of Academy.

As part of each academy's filtering and monitoring system, any use of inappropriate words/language are flagged instantly to the IT Technician team, with any unsuitable website access being reported daily. The DSL Team will take the lead responsibility for any safeguarding and child protection matters that are picked up through this monitoring

Each academy produces a half termly filtering and monitoring report, including any requests from staff for unblocking of website material, to the Executive team and includes a filtering and monitoring report as part of the Heads report to the LGB. The CEO presents a termly filtering and monitoring report to the Trust board.

## 2.15 Confidentiality

All staff should understand that:

- Timely information sharing is essential to effective safeguarding



- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, although in most circumstances data will not be shared unless a data release form is completed.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows 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
- Staff should never promise a child that they will not tell anyone about a report of abuse, neglect or exploitation, as this may not be in the child's best interests
- Staff, Governors and Trustees should use the DfEs data protection guidance for schools to help comply with the law, develop data policies and processes, know what staff and pupil data to keep and to follow good practices for preventing personal data breaches

Regarding anonymity, all staff will:

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Understand that there may be times when it is necessary to share information without consent such as when:
  - To gain consent would place the child at risk
  - To gain consent would compromise a criminal investigation
  - It cannot be reasonably expected to gain consent
- Know that there is no obligation for an academy to disclose the information to the police that could incriminate a person in an offence but that it is an offence to knowingly impede the apprehension of a person who is committing an arrestable offence. The DSL will work with the police, child and parents (if relevant) to ensure information is disclosed in a timely but informed manner
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- Speak to the DSL (or DDSL) if they are in any doubt about sharing information

Specifically, the DSL should understand that:

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Parents or carers should normally be informed of a safeguarding concern (unless this would put the victim at greater risk).
- Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- They should consider the government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and support staff who have to make decisions about sharing information

In the serious harm test under data protection legislation, there are occasions where a child's data will not be shared - in such circumstances the DSL will seek legal advice.

Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff in the appendix.

## 2.16 Complaints and concerns about academy safeguarding policies

### 2.16.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation are handled in accordance with procedures for dealing with allegations of abuse made against staff (see appendix).

### 2.16.2 Other complaints

In the first instance, other complaints should be made through either the Academy or Trust Complaints Procedures, as appropriate.

### 2.16.3 Whistle-blowing

Details of Whistle-blowing procedures can be found in the Trust Whistle-blowing Policy.

### 3 Part C1 – Procedures for recognising abuse and taking action

All paid and unpaid staff, volunteers, governors and Trustees of the Trust and its academies, and all contractors and other people using or visiting any of the premises of the Trust or its academies must follow the procedures set out below in the event that they have a safeguarding concern.

**Please note – in section 3.1 to 3.8, you should take any references to the DSL to mean the Academy Designated Safeguarding Lead (and DDSL to mean the Academy Deputy Designated Safeguarding Lead) . In all circumstances Inform the Academy DSL of any safeguarding concerns at the earliest opportunity and in their absence the Academy DDSL or a member of the Academy Safeguarding team.**

#### 3.1 If a child makes a disclosure to you (Appendix 2: The 4Rs of disclosure)

**You should:**

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Inform the DSL at the earliest opportunity. In their absence the DDSL or a member of the Safeguarding team.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Record all information on the child protection online monitoring system.
- Bear in mind that some children may:
  - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
  - Not recognise their experiences as harmful
  - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
- But none of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

#### 3.2 If you believe a child is suffering or likely to suffer harm, or in immediate danger

**You should:**

- Inform the DSL at the earliest opportunity. In their absence inform the DDSL or a member of the Safeguarding team.
- If you are unable to contact the DSL, DDSL or member of the safeguarding team, you are able to make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.
- Tell the DSL as soon as possible if it is essential you make a referral directly.
- Follow your local procedures for making a referral, as per the arrangements put in place by the three safeguarding partners or use the following link to the GOV.UK webpage for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

#### 3.3 If you discover that FGM has taken place or a student may be at risk of FGM

**You should:**

- Inform the DSL at the earliest opportunity or in their absence the DDSL or a member of the Safeguarding team, who will support you to report this to the police.
- Understand that a member of staff who either is informed by a girl under 18 that an act of FGM has been carried out on her or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately report this to the police, personally.
- Understand that this is a mandatory statutory duty, and staff will face disciplinary sanctions for failing to meet it.
- Then also inform the DSL who should involve children's social care (unless you have been specifically told by the police not to disclose)

*Further information:* Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in section D of this policy.

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

#### **You should:**

- Where possible, inform the DSL at the earliest opportunity. In their absence the DDSL or a member of the Safeguarding team.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the wider safeguarding team, or senior leadership team, and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- Make a referral to local authority children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.
- If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
- If you need to make a referral directly, you must tell the DSL as soon as possible.
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

### 3.5 If you are concerned about a child who you think may be vulnerable to being drawn into extremist activity

#### **You should:**

- If a child is not suffering or likely to suffer from harm, or in immediate danger, Inform the DSL at the earliest opportunity. In their absence the DDSL or a member of the Safeguarding team.

- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team.
- If necessary, make a referral to local authority children's social care directly. Inform the DSL or deputy as soon as practically possible after the referral.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

*Further information:* Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which academy staff and governors can call to raise concerns about extremism with respect to a student. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

### 3.6 If you have a mental health concern about a child

**You should:**

- Raise your concern with the DSL and if appropriate the relevant pastoral staff member
- Understand 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.
- Take immediate action (as above) if you have a mental health concern about a child that is also a safeguarding concern,
- Seek support from emergency services, via 999, if the learner is at risk of immediate harm.

### 3.7 If you have concerns about abuse made by students against other students (child on child abuse)

**You should:**

- Inform the DSL at the earliest opportunity. In their absence the DDSL or a member of the Safeguarding team.
- Record the allegation on the online system
- Know that it is not your responsibility to investigate it.

### 3.8 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos - *also known as 'sexting' or 'youth produced sexual imagery'*

**You should:**

- Inform the DSL at the earliest opportunity. In their absence the DDSL or a member of the Safeguarding team.
- Explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

**You must NOT:**

- View, copy, print, share, store or save the imagery yourself (unless the DSL has requested your support with doing this - for example if you are a member of the IT team).

- Ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the student to delete it.
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any child involved

**Please note – in section 3.9:**

- ***If the concern is about a member of staff, volunteer or contractor in a academy you should take any references to the DSL to mean the Academy Designated Safeguarding Lead (and DDSL to mean the Academy Deputy Designated Safeguarding Lead). In all circumstances Inform the Academy DSL of any safeguarding concerns at the earliest opportunity and in their absence the Academy DDSL or a member of the Academy Safeguarding team.***
- ***If the concern is about a member of staff, volunteer or contractor of the Trust Central Team you should inform the Head, Executive Principal or CEO of any safeguarding concerns at the earliest opportunity.***

### 3.9 If you have concerns about a staff member, supply teacher, volunteer or contractor

**You should:**

- Understand that if these concerns are that a criminal offence against or related to a child may have been committed or that a person may not be suitable to work with children, or has behaved in a way that indicates they may pose a risk of harm to children, this must be reported urgently and should not be discussed with the individual it concerns.
  - If the concerns/allegations are about a member of academy staff other than the Head, this must be reported to the Head.
  - If the concerns/allegations are about the Head, then this should be reported to the Executive Principal or are about a member of Trust Central Team including the Executive Principal, this must be reported to the SPT CEO.
  - If the concerns/allegations are about the CEO, this must be reported to the Chair of the Board of Trustees.
  - If you feel there is a conflict of interest in reporting a concern or allegation about a member of staff to the appropriate person within SPT, it can be escalated to the next appropriate person or can be reported directly to the local authority designated officer (LADO).
- Where appropriate, the Head / Executive Principal/ CEO will ensure that the LADO is informed of the allegation and appropriate actions are taken within the necessary timescale (see appendix for more detail).

## 4 Part C2 - Procedures for Academies

**Please note: Heads must ensure that the procedures set out in sections 4.1 - 4.5 below are followed in their academies.**

### 4.1 Online safety

Technology is a significant component in many safeguarding and wellbeing issues. In order to safeguard children from potentially harmful and inappropriate online material, Heads will ensure that their academy:

- Has robust processes in place to ensure the online safety of students, staff, volunteers and governors.
- Protects and educates the whole academy community in its safe and responsible use of technology, including mobile and smart technology.
- Sets clear guidelines for the use of mobile phones for the whole academy community.
- Establishes clear mechanisms, including the filtering and monitoring system, to identify, intervene in and escalate any incidents or concerns, where appropriate.
- Educates students about online safety as part of the curriculum.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year, including information and updates on filtering and monitoring.
- Educates parents/carers about online safety and share clear procedures with them so they know how to raise concerns about online safety.
- Makes sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras.
- Makes sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#).
- Has oversight of and monitors the Trust's filtering and monitoring systems to limit children's exposure to the 4 key categories of risk from the academies' IT systems.

#### **The 4 key categories of risk:**

The approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

## **4.2 Notifying parents/carers of safeguarding concerns**

The DSL/DDSL will determine whether it is appropriate for any concerns about a child to be discussed with the child's parents or carers, or other appropriate persons.

The DSL/DDSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL/DDSL. If notifying the parents/carers could increase the risk to the child, the concern will be discussed with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, the parents or carers of all the children involved will usually be notified by the DSL if appropriate and safe to do so. This will be in conjunction with the police and/or local authority children's social care to make sure the approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis) implement and share a safety plan for all parties involved in the incident.

### 4.3 Students with special educational needs, disabilities or health issues

Students with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges, children with disabilities are three times more likely to be abused, neglected or exploited than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students.
- The potential for students with SEND or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

When required, Heads will ensure that their academy provides additional pastoral support for these students, including helping students overcome any communication barriers they face. Any abuse involving students with SEND involves close liaison between the DSL (or DDSL) and the SENDCO.

### 4.4 Children with a social worker

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

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

If a student has a social worker, the DSL/DDSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about suspensions, and responding to unexplainable and/or persistent absence, where there are known safeguarding risks and the provision of pastoral and/or academic support.

If a DSL/DDSL wishes to raise concerns regarding the students social worker, this should be escalated through the relevant local authority.

### 4.5 Children Looked After (CLA) and Previously Children Looked After (PCLA)

The designated teacher in each academy will ensure that staff have the skills, knowledge and understanding to keep Children in Care safe. In particular, appropriate staff will have relevant information about children's legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

The Designated Teacher will have details of children's social workers and relevant virtual academy heads.

The designated teacher is responsible for promoting the educational achievement of children in care in line with [statutory guidance](#). The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL and wider Safeguarding Team to ensure that any safeguarding concerns regarding children in care are quickly and effectively responded to.



- Work with virtual academy heads to promote the educational achievement of children in care, including discussing how student premium plus funding can be best used to support children in care and meet the needs identified in their personal education plans.

**Please note:**

- **Heads must ensure that the procedures set out in section 4.6 - 4.10 below are followed in their academies.**
- **The SPT CEO must ensure that the procedures set out in sections 4.6 - 4.10 are followed in the Trust Central Team (For Head read CEO).**

## 4.6 Record-keeping

Heads will ensure that all safeguarding concerns, discussions, decisions made and the reasons for those decisions, will be recorded in writing.

Records will include:

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

The DSL /DDSL will review information entered by all staff on the online monitoring system.

The DSL/DDSL will provide robust training at least annually with regards to reliable recording and information sharing.

Concerns and referrals, either electronic or paper, will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the academy has, or has had, safeguarding concerns moves to another academy, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.

To allow the new academy to have support in place when the child arrives, this should be:

- Within 5 days for an in-year transfer, or
- Within the first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving academy and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Information is shared with other agencies in line with local safeguarding procedures and the Trust Data Protection Policy.

Records are stored and retained in line with the Trust Information Security Policy and the Trust Data Retention Policy

## 4.7 Training

### 4.7.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the academies' safeguarding systems and their responsibilities, and can identify signs of possible abuse, neglect and exploitation.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-academy safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all students

All staff will have training on the government's anti-radicalisation strategy, Prevent, at least every two years 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, including on online safety, as required but at least annually.

Volunteers will receive appropriate training.

### 4.7.2 The DSL and DDSL

The DSL and DDSL will undertake child protection and safeguarding level three training at least every 2 years. This is provided by a recognised training provider to ensure it includes information on local contextual safeguarding. They will also undertake Prevent awareness training annually.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). The DSL will read (and share with the appropriate academy staff) the SPT termly safeguarding bulletin and access further training through an appropriate and recognised training provider

## 4.8 Recruitment and selection of staff and volunteers

In our recruitment and selection of staff and volunteers we will at all times adhere to Stamford Park Trust Recruitment and Selection policies and procedures, and to Keeping Children Safe in Education.

At least one person conducting any interview for any post must have undertaken safer recruitment training in the last three years. This will cover, as a minimum, the contents of Keeping Children Safe in Education. For more information about safer recruitment procedures please refer to the SPT Safer Recruitment Policy.

## 5 Section D: further information and guidance regarding specific safeguarding issues

### 5.1 Further information for all staff

#### 5.1.1 Unexplainable and/or persistent absences from education.

A child going missing from education, for prolonged periods and/or on repeat occasions, can be a warning sign of a range of safeguarding issues. This might include abuse, neglect or exploitation, such as sexual

abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a academy
- Come from new migrant families

The Academy Attendance Policy and Procedures for unexplainable and/or persistent absence from education and for dealing with children who go missing from education, particularly on repeat occasions, will be followed to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the academy without a new academy being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, child protection procedures will be followed, including with respect to making reasonable enquiries. An immediate referral to the local authority children's social care team, and the police, will be made, if the child is suffering or likely to suffer from harm, or in immediate danger.

### 5.1.2 Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, children may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other children.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other children involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing academy or education
- Not taking part in education
- May involve an exchange for something the victim wants and/or for the financial advantage or increased status of the perpetrator or facilitator

- Go missing from home and/or school and are subsequently found in areas away from their home.
- Have been the perpetrator or alleged perpetrator of serious violence (e.g. knife crime), as well as the victim

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### 5.1.3 Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, this may be in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, children may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant
- If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### 5.1.4 Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of academy. It can also take place both face-to-face and online, and can occur simultaneously between the two.

SPT has a zero-tolerance approach to sexual violence and sexual harassment. Even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

It is important that when staff have any concerns about child-on-child abuse they should speak to their DSL.

When considering instances of harmful sexual behaviour between children, their ages and stages of development will be considered. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will be offered appropriate support.

#### 5.1.5 Process for managing incidents of child on child abuse:

- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and safety plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering academy transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- Concerns about foster carers or anyone in a position of trust working or volunteering with children should be referred to the LADO by the DSL on the day that the allegation is reported. The setting should not undertake any investigation unless advised by the LADO.

#### 5.1.6 Creating a supportive environment in academy and minimising the risk of child-on-child abuse

Taking proactive action to minimise the risk of child-on-child abuse, and creating a supportive environment where victims feel confident in reporting incidents is essential. To achieve this, Heads will ensure that curriculums help to educate students about appropriate behaviour and consent and students are able to easily and confidently report abuse.

And the Head will ensure all staff:

- Are alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area
- Support children who have witnessed sexual violence, especially rape or assault by penetration and ensure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- reassure victims that they are being taken seriously
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

- Are vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- Are aware that even if there are no reports of child-on-child abuse in academy, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- Act immediately if they have any concerns about a child’s welfare, rather than wait to be told
- Are aware that victims may not always make a direct report. For example: children can show signs or act in ways they hope adults will notice and react or a friend may make a report, member of staff may overhear a conversation or a child’s behaviour might indicate that something is wrong.
- Recognise that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Recognise the important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- Recognise that social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

#### 5.1.7 Investigation and disciplinary action in response to child-on-child abuse

The DSL will take the lead role in any disciplining of the alleged perpetrator(s) and will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent academies from coming to their own conclusion about what happened and imposing a penalty accordingly. Matters will be considered on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution, liaising with the police and/or LA children’s social care to determine this
- There are circumstances that make it unreasonable or irrational to continue investigating about what happened while an independent investigation is ongoing

#### 5.1.8 Sharing of nudes and semi-nudes (‘sexting’)

Sexting is the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery).

Following a report of an incident, the DSL will hold an initial review meeting with appropriate academy staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or children’s social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another academy, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the images or videos is under 13 years old.
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the head and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks and they will hold interviews with the students involved (if appropriate).

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

#### **Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

#### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through the academies' local arrangements.

#### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in this policy also apply to recording these incidents.

#### **Curriculum coverage**

As part of a broad and balanced curriculum students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education [primary] / relationships and sex education [secondary] curriculums. This includes a more personalised or contextualised approach for vulnerable learners, including SEND children. The DSL works alongside the curriculum leader for PHSE to regularly review the curriculum and to consider contextual safeguarding issues within it.

### **5.1.9 Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.



Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in academy (usually the designated safeguarding lead) before the child or children arrive at academy the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

#### 5.1.10 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL [and deputy/deputies] will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

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

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

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

#### 5.1.12 FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from academy, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)



- FGM being known to be practised in the girl’s community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from academy
  - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication
- The above indicators and risk factors are not intended to be exhaustive.

### 5.1.13 Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. The legal age for anyone to marry is 18, this includes non-binding ‘unofficial’ marriages as well as legal marriages.

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

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or academy counsellor, as appropriate.

### 5.1.14 Preventing radicalisation

Radicalisation refers to the process of a person legitimizing support for, or use of , terrorist violence. Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to: negate or destroy the fundamental rights and freedoms of others; or undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights or intentionally create a permissive environment for others to achieve the results above.

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

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 of terrorism 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.

Academies have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

The risk of children in our academies being drawn into terrorism will be assessed. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

Academies ensure that suitable internet filtering is in place, and equip students to stay safe online at academy and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow the procedures set out in this policy, including discussing their concerns with the DSL.

Staff should always act if they are worried.

### 5.1.15 Sexual violence and sexual harassment between children in academies

Sexual violence and sexual harassment can occur:

- Between two children of any age and sex

- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)
- Sexual violence and sexual harassment exist on a continuum and may overlap.
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same academy.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse, neglect or exploitation. Nor should a victim ever be made to feel ashamed for making a report.

It is important that when staff have any concerns about child-on-child abuse they should speak to their DSL.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the academy that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk. .

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

### 5.1.16 Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Unexplainable and /or persistent absence from academy
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation)

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from academy
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

- Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL.

#### 5.1.17 Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the academy, their credentials and reason for visiting will be checked before allowing them to enter the academy. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the academy who are visiting for a professional purpose, such as educational psychologists or social workers, will be asked to show photo ID and will be asked to show their DBS certificate, which will be checked alongside their photo ID; or the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. The academy will not invite into the academy any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using academy facilities is not seeking to disseminate extremist views or radicalise students or staff.

## Appendix 1: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Emotional abuse** 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**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
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

## Appendix 2: Allegations of Abuse Made Against Staff / Low Level Concerns

### Section 1: Allegations that may meet the harms threshold

All allegations of abuse made against a member of staff in relation to a student must be brought to the attention of the Head immediately. These concerns will be categorised into two:

- Allegations that may meet the Harms criteria and will be referred to the LADO.
- Concerns that do not meet the Harms threshold and will be dealt with as Low-Level Concerns. This means that where the Head considers that a referral appears to meet the LADO criteria, the Head will inform the Local Authority's Designated Officer (LADO) within 1 working day. All LADO referrals will also be reported via the to the Trust HR team, Executive Principal (Secondary Schools) and CEO.

If the allegation meets Harms criteria detailed below, the Head (or other lead person) must report it to the LADO within 1 working day.

If it is alleged that a teacher or member of staff (including a volunteer) has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

The Local Authority's Designated Officer must be informed of all allegations that come to the academies/trusts attention that meet the Harm's Criteria so that they can consult police and social care colleagues as appropriate. All alleged physical injuries must be investigated by the appropriate external agencies

If there is any doubt as to whether a concern meets the harm threshold, the local authority designated officer (LADO) will be contacted.

Where the Head considers that incident does not meet the Harms Threshold a Low-Level Concerns investigation will be initiated.

All Low-Level Concerns will also be reported to the Trust HR Team.

### Section 2: Concerns that do not meet the harm threshold / low level concerns: Please refer to the Staff Low Level Concerns Procedure.

This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the academy
- Pre-employment vetting checks

Stamford Park Trust recognises the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children and staff.

## Definition of low-level concerns

A low-level concern is any concern that an adult has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work but does not meet the threshold of harm. Concerns that do not meet the Harms threshold will be fully investigated within the academy and the appropriate actions recorded in the personnel files.

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the academy/trust 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 designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child/young person on a one-to-one basis in a secluded area or behind a closed door
- Humiliating students
- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse/exploitation

An allegation can also relate to an adult's behaviour outside of work, and their relationships with others if they:

- Have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to relate directly to a child.
- Have, as a parent or carer, become subject to child protection procedures.
- Are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

KCSIE states that, as part of a whole academy and Trust wide approach to safeguarding, we should ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the academy are dealt with promptly and appropriately.

Any allegation of abuse will be dealt according to the SPT Disciplinary Policy.

***The term 'low-level concern' does not mean that it is insignificant. 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'.***

## Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately. Please refer to the staff Low Level Concerns Procedure.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns

- Empowering staff to self-refer if, for example, if they know are going to be in a situation which would be deemed a breach of the staff code of conduct (for example, a staff member has a child who is a student in the academy and they have the mobile number of their child's friend) or if they find themselves in a situation which could be misinterpreted, or might appear compromising to others.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Ensuring our ongoing culture of vigilance maintains a mindset that 'it could happen here'.

### Responding to low-level concerns

If the concern is raised via a third party, the head either appoint an investigating officer or investigate themselves and will collect evidence where necessary by speaking directly to the person who raised the concern, unless it has been raised anonymously, to the individual involved and any witnesses. The head will use the information collected to categorise the type of behaviour and determine any further action, in line with SPT's Staff Code of Conduct. The head will seek advice from the SPT HR Team and the Executive Principal/CEO/LADO as appropriate.

### Record keeping

The Head will ensure that all low-level concerns will be recorded in writing and held on file. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold this will be referred to the designated officer at the local authority.
- Retained in accordance with the SPT Data Retention Procedures.
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### References

Low-level concerns will not be included in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance
- Has been subject to a disciplinary that remains 'live' on their personal file



## Appendix 3: Legislation and Statutory Guidance

This policy is based on the Department for Education’s statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#).

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent Academy Standards\) Regulations 2014](#), which places a duty on academies and independent academies to safeguard and promote the welfare of students at the academy
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains academies’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation.
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- Requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

This policy complies with the Stamford Park Trust’s funding agreement and articles of association.

The Trust and its academies will engage with any locally agreed multi-agency procedures put in place by the academy safeguarding partners as identified in Keeping Children Safe in Education.

The Trust and its academies will cooperate with any statutory safeguarding assessments conducted by children's social care, this includes ensuring representation at appropriate inter agency meetings such as children in need, child protection meetings, strategy meetings, local hub MASH meetings and core group meetings.

## Appendix 4: What to do if a child discloses abuse: always follow the 4Rs

### 1. Receive

**LISTEN** to the student. If you are shocked at what the student says to you try not to show it. Take what the student says to you seriously, children and young people rarely lie about abuse and if they are not believed it adds to the traumatic nature of disclosing. If they meet with revulsion or disbelief, children and young people may retract what they have said.

**ACCEPT** what the student says. Be careful not to burden the young person with guilt by asking, "Why didn't you tell me before?"

### 2. Reassure

**STAY CALM.** Reassure the young person that they have done the right thing in talking to you. Be honest with the student. Do not make any promises that you are unable to keep, like "I'll stay with you", or "Everything will be all right now".

**DO NOT** promise confidentiality.

**TRY** to alleviate any feelings of guilt that the student displays, e.g. "You are not alone, you are not the only one this sort of thing has happened to".

**ACKNOWLEDGE** how hard it must have been for the young person to tell you what has happened.

**EMPATHISE** with the student. Don't tell them what they should be feeling.

### 3. React

**REACT** to the student only as far as is necessary for you to establish whether or not you need to refer to matter.

**DO NOT** interrogate the child or make investigations with third parties to establish any of the facts.

**AVOID** asking leading questions, for example "Did he touch you?"

**BE** careful about what you ask the child; you may taint any evidence being put before a court.

**USE** open questions, such as, "Is there anything else you would like to tell me?" or "When did it happen?"

**DO NOT** criticise the perpetrator. The student may love him/her and reconciliation may be possible.

**DO NOT** ask the child to repeat what has been said to another member of staff.

**EXPLAIN** what you have to do next and to whom you have to talk to.

**INFORM** the Designated Safeguarding Lead

#### 4. Record

**AS SOON** as is reasonably possible make notes on what has happened.

**DO NOT** destroy these notes, they should be retained in a safe place. The court in any legal process may require them.

**RECORD** Place, date, time and details of the child/young person involved. Record any noticeable non- verbal behaviour of the student. If the young person uses their own words to describe sexual organs/acts, record the words spoken. Do not translate them into proper words. Record this incident on CPOMS as soon as possible.

**DRAW** a diagram (using 'body map') to indicate positioning, size and location of any injuries you have identified

**BE OBJECTIVE** in your recording. Include statements made and what you have seen, rather than assumptions or interpretations. Rely on FACT. A fact is any event that can be perceived by one of the five senses.

**SUPPORT**

Certain disclosures can be very emotive. Please seek support from the Designated Safeguarding Lead.

## Annex: Local Academy Arrangements