



The Circle Trust Document: **Safeguarding Policy**

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Owner:	Educational Outcomes Trustees
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Changes History:

Version	Date	Amended by:	Substantive changes:	Purpose
1.0			n/a	First release
1.1	4.10.18	Director of Safeguarding	Adding new guidance from "Keeping Children Safe in Education" September 2018	Compliance
1.2	10/19	Director of Safeguarding	Reference to "Keeping Children Safe in Education" September 2019	Compliance
1.3	10/20	Director of Safeguarding	Rewritten to include updates in "Keeping Children Safe in Education" September 2020" Legislation across all age ranges as outlined in section 2 Addition of new schools to the Trust in Appendix	Compliance
1.4	11.5.21	Director of Safeguarding	Addition to Glossary Addition of The Emmbrook School to Appendix 5	Compliance

			Addition to Appendix 4 New section 16.2	
1.5	29.6.21	Company Secretary	Update to Wescott School Link Local Advisor – Appendix 5	Admin update
1.6	13.10.21	Director of Safeguarding	Rewritten to include updates in “Keeping Children Safe in Education” September 2021” Update to reflect all schools current DSLs, DDSLs and Link Advisors – Appendix 5	Compliance Admin update
1.7	01.2.2022	Company Secretary	Change to Safeguarding Link Trustee – Appendix 6	Admin update
1.8	11.2.2022	Company Secretary	Change to DSL at The Emmbrook – Appendix 5	Admin update
1.9	24.2.2022	Company Secretary	Update to details of DDSL at The Emmbrook – Appendix 5	Admin update
1.10	24.3.2022	Company Secretary	Update to details of DDSL at St Crispin’s – Appendix 5	Admin update
1.11	01.9.2022	Director of Safeguarding /Company Secretary	Rewritten to include updates in “Keeping Children Safe in Education” September 2022” Update to reflect all schools current DSLs, DDSLs and Link Advisors – Appendix 5	Compliance Admin update
1.12	11.10.2022	Company Secretary	Review date brought forward to August each year	Compliance
1.13	31.10.2022	Director of Safeguarding /Company Secretary	Clarification to safer recruitment processes in relation to disqualification under the Childcare Act 2006 (Appendix 2) Inclusion in section 2 of Department for Education guidance on Prevent Duty	Compliance

			published in October 2022 here	
1.14	21.7.2023	Director of Safeguarding	<p>Rewritten to include updates in “Keeping Children Safe in Education” September 2023”</p> <p>Update to reflect all schools current DSLs, DDSLs and Link Advisors – Appendix 5</p> <p>Updated to reflect current yearly training expectations for staff</p>	<p>Compliance</p> <p>Admin update</p> <p>Admin update</p>

Glossary of Key Terms

SMSC	-	Spiritual, Moral Social and Cultural
LAB	-	Local Advisory Board
DSL	-	Designated Safeguarding Lead
DDSL	-	Deputy Designated Safeguarding Lead
PSHCE	-	Personal, Social Health and Citizenship Education
LADO	-	Local Authority Designated Officer
LA	-	Local Authority
LAC	-	Looked After Child
PLAC	-	Previously Looked After Child
WBC	-	Wokingham Borough Council
CPD	-	Continuous Professional Development
CME	-	Children Missing in Education
FGM	-	Female Genital Mutilation
HBV	-	Honour Based Violence
SEND	-	Special Educational Needs and Disabilities
SENCO	-	Special Education Needs Co-ordinator
CCE	-	Child Criminal Exploitation
UKCCIS	-	UK Council for Child Internet Safety
SLT	-	Senior Leadership Team
DBS	-	Disclosure & Barring Service
RSE	-	Relationship and Sex education

1. Aims

1.1. The Circle Trust aims to ensure that:

- 1.1.1. Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- 1.1.2. All staff are aware of their statutory responsibilities with respect to safeguarding
- 1.1.3. Staff are properly training in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

2.1. This policy is based on:

- 2.1.1. the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.
- 2.1.2. Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- 2.1.3. [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- 2.1.4. 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
- 2.1.5. [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- 2.1.6. [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- 2.1.7. Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- 2.1.8. [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- 2.1.9. [Guidance on protecting learners vulnerable to radicalisation](#), which provides support for those working in education settings with safeguarding responsibilities

- 2.1.10. [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)
- 2.1.11. 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
- 2.2. This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- 2.3. This policy also complies with our funding agreement and articles of association.

3. Definitions

- 3.1. Safeguarding and promoting the welfare of children means:
- 3.1.1. Protecting children from maltreatment
 - 3.1.2. Preventing impairment of children’s mental and physical health or development
 - 3.1.3. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - 3.1.4. Taking action to enable all children to have the best outcomes
- 3.2. **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
- 3.3. **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- 3.4. **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.
- 3.5. **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
- 3.6. **Children** includes everyone under the age of 18.
- 3.7. The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- 3.7.1. The local authority (LA)
- 3.7.2. Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- 3.7.3. The chief officer of police for a police area in the LA area
- 3.8. **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse 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.
- 3.9. **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.

4. Equality statement

- 4.1. Some children have an increased risk of abuse, both online and offline, 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 ensure that all children have the same protection, regardless of any barriers they may face.
- 4.2. We give special consideration to children who:
 - 4.2.1. Have special educational needs (SEN) or disabilities or health conditions (see section 10)
 - 4.2.2. Are young carers
 - 4.2.3. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
 - 4.2.4. Have English as an additional language
 - 4.2.5. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
 - 4.2.6. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
 - 4.2.7. Are asylum seekers
 - 4.2.8. Are at risk due to either their own or a family member's mental health needs
 - 4.2.9. Are looked after or previously looked after (see section 12)

4.2.10. Are missing or absent from education for prolonged periods and/or repeat occasions

4.2.11. Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

5.1. Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, Local Advisors and Trustees in The Circle Trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.2. The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

5.2.1. Behaviour policy

5.2.2. Pastoral support system

5.2.3. Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.3. All staff and volunteers will read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

5.4. All staff, volunteers, Local Advisors and Trustees will

- Complete an online assessment with The Key to evidence their understanding of the latest version of Keeping Children Safe in Education.

- reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- provide a safe space for pupils who are LGBT to speak out and share their concerns

5.5. All staff, volunteers, Local Advisors and Trustees in The Circle Trust will be aware of:

- 5.5.1. The Safeguarding and Child Protection Policy
- 5.5.2. The Staff Code of Conduct Please refer to [The Circle Trust's Code of Conduct](#).
- 5.5.3. The Behaviour Policy Please refer to the individual school policy.
- 5.5.4. The role of the Designated Safeguarding Leads
- 5.5.5. Online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- 5.5.6. The safeguarding response to children who go missing from education
- 5.5.7. The early help 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
- 5.5.8. The process for making referrals to the local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- 5.5.9. What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- 5.5.10. The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation and serious violence (including that linked to county lines)
- 5.5.11. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- 5.5.12. The fact that children can be at risk of harm inside and outside of their home, at school and online
- 5.5.13. The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children

5.5.14. What to look for to identify children who need help or protection

5.6. The Trustees will:

- 5.6.1. Evaluate and agree the Safeguarding and Child Protection Policy, ensuring that the policy is in line with The Circle Trust's core values
- 5.6.2. Approve this policy at each review, ensure it complies with the law and hold the executive headteacher to account for its implementation.
- 5.6.3. Appoint a Trustee to lead and monitor the effectiveness of this policy in conjunction with the Trustees across Trust.
- 5.6.4. Complete Annual Safeguarding training as recommended by the Trust DSL and Link Safeguarding Trustee
- 5.6.5. Read and understand the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), in its entirety and review this guidance at least annually

5.7. The Local Advisory Board (LAB) will:

- 5.7.1. Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- 5.7.2. Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- 5.7.3. Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- 5.7.4. Appoint a link safeguarding local advisor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- 5.7.5. Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with the advice from safeguarding partners
- 5.7.6. Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

5.7.7. Make sure:

5.7.7.1. The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support

5.7.7.2. Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

5.7.7.3. The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

5.7.7.4. The school 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). Appendix 3 of this policy covers this procedure

5.7.7.5. 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

5.7.8. Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

5.7.8.1. Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

5.7.8.2. Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

5.7.8.3. Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

5.8. The Chair of Local Advisors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

5.9. All Local Advisors will read Keeping Children Safe in Education in its entirety.

5.10. The Chief Executive Officer will:

5.10.1. Quality assure safeguarding practice and procedures.

5.11. Headteachers will:

- 5.11.1. Cultivate an ethos within their school community where everyone in the school's community feels confident, competent, comfortable and supported to draw safeguarding issues to the attention of the Headteacher, the Designated Safeguarding Lead (DSL) or the Designated Safeguarding Local Advisor so that anyone is able to pose safeguarding questions with "respectful uncertainty" as part of their shared responsibility to safeguard children and young people
- 5.11.2. Ensure that staff (including temporary staff) and volunteers:
- Are informed of the Trust and school 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 and neglect
- 5.11.3. Communicating this policy to parents/carers when their child joins the school and via the schools website
- 5.11.4. Maintain an environment where children or young people feel secure and are encouraged to talk and are listened to
- 5.11.5. Promote adults in the school to children or young people whom they can approach if they are worried
- 5.11.6. Appoint a Designated Safeguarding Lead (and if appropriate Deputy Designated Safeguarding Lead) and provide them such time as to discharge their responsibilities in relation to Child Protection and Safeguarding; ensuring they are appropriately trained and have the capacity and authority to undertake this role
- 5.11.7. Ensure that all staff, volunteers, Local Advisors and Trustees have appropriate training, updating the content regularly, and/or guidance on appropriate safeguards and procedures for raising safeguarding issues
- 5.11.8. Take all reasonable measures to ensure risks of harm to children or young people's welfare are minimised
- 5.11.9. Promote health and safety, promoting safe practice and challenge unsafe practice
[Please refer to The Circle Trust's Health and Safety Policy](#)
- 5.11.10. Include opportunities in the Personal, Social, Health and Citizenship Education (PSHCE) curriculum for children and young people to develop the skills they need to recognise and stay safe from abuse
- 5.11.11. Put in place and promote robust anti-bullying, including cyber bullying, strategies
- 5.11.12. Meet the health needs of children and young people with medical conditions

- 5.11.13. Provide first aid
- 5.11.14. Maximise school security
- 5.11.15. Tackle drugs and substance misuse
- 5.11.16. Ensure that procedures are followed in dealing with allegations of abuse against staff and volunteers
- 5.11.17. Follow [The Circle Trust's Selection and Recruitment policy](#) in respect to safer recruitment
- 5.11.18. Refer immediately, and through the proper procedure, any concern relating to staff to the Local Authority Designated Officer (LADO)
- 5.11.19. If appropriate, making sure each child in the Early Years Foundation Stage is assigned a key person.
- 5.11.20. Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- 5.11.21. In our Early years and primary settings, ensure the relevant staffing ratios are met, where applicable
- 5.11.22. In our Early years settings:
 - Making sure each child in the Early Years Foundation Stage is assigned a key person
 - Overseeing the safe use of technology, mobile phones and cameras in the setting
- 5.12. The Designated Safeguarding Lead (DSL)
 - 5.12.1. The DSL within each Trust school is a member of the senior leadership team. The Trust has an appointed DSL to ensure compliance across all schools in the Trust. The DSLs take lead responsibility for child protection and wider safeguarding.
 - 5.12.2. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
 - 5.12.3. The details for safeguarding procedures in each school can be seen in appendix 5.
 - 5.12.4. When the DSL is absent, the DDSL(s) will act as cover.
 - 5.12.5. If the DSL and DDSL(s) are not available, The Circle Trust DSL will act as cover (for example, during out-of-hours/out-of-term activities).
 - 5.12.6. The DSL will be given the time, funding, training, resources and support to:
 - provide advice and support to other staff on child welfare and child protection matters

- 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
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.
- have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

5.12.7. The DSL will also:

- keep the headteacher informed of any issues,
- 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 school's policies
- 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
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search. In the Circle Trust, only the DSL and/or Headteacher can give authority for a student to be seen by the Police on the school site. We recognise as a Trust that schools are a safe place for children/young people and therefore we will liaise with the Police to discuss such visits taking away from the schools site. However we recognise that in some circumstances this may not be possible such as section 47 enquiries or criminal behaviour taking place on school property

5.13. Virtual school heads

5.13.1. Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

5.13.2. They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

6. Confidentiality

- 6.1. The Trust's approach to confidentiality and data protection is outlined in the Parent's/Carer's Privacy Notice.
- 6.2. Timely information sharing is essential to effective safeguarding.
- 6.3. 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.
- 6.4. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- 6.5. 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.
- 6.6. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- 6.7. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - 6.7.1. There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - 6.7.2. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - 6.7.3. The DSL should consider that:
 - 6.7.3.1. Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - 6.7.3.2. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - 6.7.3.3. Rape, assault by penetration and sexual assault are crimes. 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
- 6.8. Regarding anonymity, all staff will:
 - 6.8.1. Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

- 6.8.2. 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
- 6.8.3. Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- 6.9. The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- 6.10. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- 6.11. Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3.

7. Recognising abuse and taking action

- 7.1. Staff, volunteers and local advisors must follow the procedures set out below in the event of a safeguarding issue.
- 7.2. Please note – in this and subsequent sections, references to the DSL should be taken to mean “the DSL (or deputy DSL)”.
- 7.3. If a child is suffering or likely to suffer harm, or in immediate danger:
 - 7.3.1. 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 in immediate danger. **Anyone can make a referral**
 - 7.3.2. Tell the DSL as soon as possible if you make a referral directly
 - 7.3.3. Local Procedures for making a referral in each Trust school can be viewed in appendix 5.
- 7.4. If a child discloses a safeguarding issue to you, adults within Trust schools should:
 - 7.4.1. Listen to and believe them. Allow them time to talk freely and do not ask leading questions
 - 7.4.2. Remember that the school within the Trust is not the investigator – their role is to collect information and share if required with the appropriate agency/ies
 - 7.4.3. Stay calm and do not show that you are shocked or upset
 - 7.4.4. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

- 7.4.5. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- 7.4.6. Write up the conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- 7.4.7. Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.
- 7.4.8. 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
- 7.4.9. None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.5. If you discover that FGM has taken place or a pupil is at risk of FGM:

- 7.5.1. The Department for Education's 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".
- 7.5.2. 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'.
- 7.5.3. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.
- 7.5.4. **Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18, 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 should immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- 7.5.5. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

- 7.5.6. **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.
- 7.5.7. The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff **must not** examine pupils.
- 7.5.8. **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.
- 7.6. 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):
- 7.6.1. Staff should follow the local procedures for their school as shown in appendix 5
- 7.6.2. Where possible, speak to the DSL first to agree a course of action.
- 7.6.3. 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 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
- 7.6.4. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.
- 7.7. Early help
- 7.7.1. If early help is appropriate, the DSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
- 7.7.2. We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
- 7.7.3. The DSL will keep the case under constant review and the trust school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
- 7.8. Referral
- 7.8.1. 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.
- 7.8.2. If you make a referral directly, you must tell the DSL as soon as possible.

7.8.3. 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.

7.8.4. Staff should follow the local procedures for their school as shown in appendix 5.

7.9. If you have concerns about extremism:

7.9.1. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

7.9.2. 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 and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

7.9.3. 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.

7.9.4. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Local Advisors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

7.9.5. 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

7.10. If you have a mental health concern:

7.10.1. 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.

7.10.2. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

7.10.3. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in the local procedures for their school as shown in appendix 5.

7.10.4. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

7.11. Concerns about a staff member, supply teacher, volunteer or contractor

7.11.1. If you have concerns about a member of staff (including a supply teacher or volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher **as soon as possible**. If the concerns/allegations are about the headteacher, speak to the chair of local advisors **as soon as possible**.

7.11.2. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

7.11.3. If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.11.4. Further details of raising concerns about staff can be viewed in the [Whistleblowing Policy](#)

7.12. Allegations of abuse made against other pupils

7.12.1. The Trust recognises 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 pupils.

7.12.2. The Trust also recognises the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

7.12.3. Most cases of pupils hurting other pupils will be dealt with under the school’s behaviour policy, but this child protection and safeguarding 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 pupils in the school at risk
- is violent
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and/or semi-nudes).

See Appendix 4 for more information about Child on child Abuse.

7.12.4. If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it.
- 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 support 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 school 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.
- In liaising with external agencies, the DSL will assess the level of support required for children, ensuring that should targeted provision need to be put in place, this is sought through the recognised referrals. Appropriate in school support will be offered for all students where necessary.
- If applicable, safety plans/risk assessments will be put in place to support, and ensure the safety of, all children.
- If necessary, sanctions will be applied through the school's behaviour procedures.

7.12.5. 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.

7.12.6. The Trust will create a supportive environment in school and minimise the risk of child-on-child abuse by:

- challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- ensuring pupils are able to easily and confidently report abuse using our reporting systems
- ensuring staff reassure victims that they are being taken seriously
- being 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 that should be shared with safeguarding partners
- supporting children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

- considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- ensuring staff are trained to understand:
 - how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - that if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and 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 to
 - a friend may make a report
 - a member of staff may overhear a conversation
 - a child’s behaviour might indicate that something is wrong
 - that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - that a pupil 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
 - 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
 - that they should speak to the DSL if they have any concerns
 - 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

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

7.12.7.1. 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 our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this

- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.13. The sharing of nudes and/or semi-nudes

7.13.1. If you are made aware of an incident involving the consensual or non-consensual sharing of nude and/or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

7.13.2. You must **not**:

- view, download or share the imagery yourself, or ask a pupil 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 pupil to delete it
- ask the pupil(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 pupil(s) it involves or their, or other, parents and/or carers
- say or do anything to blame or shame any young people involved

7.13.3. You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

7.13.4. 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 imagery 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 pupil in the imagery is under 13
- the DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

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

7.13.6. All incidents involving the sharing of nudes and/or semi-nudes and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

7.13.7. Pupils are taught about the issues surrounding sexting as part of our PSHCE and RSE programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

8. Notifying parents or carers

8.1. Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure however as per section 6, there are cases where his contact will not have taken place prior to a referral and **staff should act without delay.**

8.2. Where there is a split family, the DSL will endeavour to ensure that all those that hold Parental responsibility are kept informed although if we believe that notifying the parents or carers would increase the risk to the child or the other parent, a referral can be made without doing so we will discuss this with further the local authority children's social care team.

8.3. Other staff will only talk to parents about any such concerns following consultation with the DSL or DDSL.

8.4. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved however as per section 6, there are cases where his contact will not have taken place prior to a referral. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

8.4.1. The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

8.5. The child's wishes will **always** be taken into account when dealing with a disclosure although in some cases, action may have to be taken against their wishes to ensure that they or others are kept safe.

9. Pupils with special educational needs, disabilities or health issues

9.1. We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- 9.1.1. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- 9.1.2. Pupils being more prone to peer group isolation or bullying than other pupils
- 9.1.3. The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- 9.1.4. Communication barriers and difficulties in overcoming these barriers
- 9.1.5. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

10. Pupils with a social worker

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

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

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

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

11. Looked-after and previously looked-after children

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

- 11.1.1. Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- 11.1.2. The DSL has details of children's social workers and relevant virtual school heads
- 11.2. Each school within the Trust has appointed a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- 11.3. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- 11.4. As part of their role, the designated teacher will:
 - 11.4.1. Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
 - 11.4.2. Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans
 - 11.4.3. The designated teacher for LAC and PLAC students can be the DSL

12. Reporting systems for our pupils

- 12.1. Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
- 12.2. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
- 12.3. To achieve this, we will:
 - 12.3.1. Put systems in place in each for pupils to confidently report abuse
 - 12.3.2. Ensure reporting systems are well promoted, easily understood and easily accessible for pupils
 - 12.3.3. Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

13. Online Safety and the Use of Mobile Phone Technology

- 13.1. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
- 13.2. To address this, our school aims to:
- 13.2.1. Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Local Advisors
 - 13.2.2. Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as Mobile Phones)
 - 13.2.3. Set clear guidelines for the use of mobile phones for the whole school community
 - 13.2.4. Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- 13.3. Our approach to online safety is based on addressing the following categories of risk:
- 13.3.1. **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
 - 13.3.2. **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
 - 13.3.3. **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
 - 13.3.4. **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams
- 13.4. To meet our aims and address the risks above, we will:
- 13.4.1. Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online

- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- 13.4.2. Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- 13.4.3. Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- 13.4.4. Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- 13.4.5. Make all pupils, parents/carers, staff, volunteers and Local Advisors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- 13.4.6. Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- 13.4.7. Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- 13.4.8. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- 13.4.9. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- 13.4.10. Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- 13.4.11. Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- 13.5. The headteacher is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.
- 13.6. The DSL takes lead responsibility for online safety in school, in particular:
- 13.6.1. Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school

- 13.6.2. Working with the headteacher and Local Advisory Board to review this section of the policy annually and ensure the procedures and implementation are updated and reviewed regularly
- 13.6.3. Taking the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks
- 13.6.4. Working with the ICT manager to make sure the appropriate systems and processes are in place
- 13.6.5. Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents
- 13.6.6. Managing all online safety issues and incidents in line with the school's child protection policy
- 13.6.7. Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- 13.6.8. Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- 13.6.9. Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- 13.6.10. Liaising with other agencies and/or external services if necessary
- 13.6.11. Providing regular reports on online safety in school to the headteacher and/or governing board
- 13.6.12. Undertaking annual risk assessments that consider and reflect the risks children face
- 13.6.13. Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively
- 13.7. The person responsible for IT in school (curriculum and non-curriculum) is directly responsible for, or for ensuring that these actions are completed by the external IT support organisation:
 - 13.7.1. Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems, which are reviewed and updated on a regular basis to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
 - 13.7.2. Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
 - 13.7.3. Conducting a full security check and monitoring the school's ICT systems regularly

- 13.7.4. Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- 13.8. All staff, including contractors and agency staff, and volunteers are responsible for:
 - 13.8.1. Maintaining an understanding of this section of the policy
 - 13.8.2. Implementing this section of the policy consistently
 - 13.8.3. Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet and ensuring that pupils follow the school's terms on acceptable use
 - 13.8.4. Knowing that the DSL is responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes failing
 - 13.8.5. Following the correct procedures by if they need to bypass the filtering and monitoring systems for educational purposes
 - 13.8.6. Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this section of the policy
 - 13.8.7. Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy/procedures
 - 13.8.8. Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline, and maintaining an attitude of 'it could happen here'
- 13.9. Visitors and members of the community who use the Trust's and school's ICT systems or internet will be made aware of this policy, when relevant, and are expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use
- 13.10. The Local Advisory Board in each school will
 - 13.10.1. make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.
 - 13.10.2. make sure all staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.
 - 13.10.3. co-ordinate regular meetings with appropriate staff to discuss online safety, requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).
 - 13.10.4. ensure children are taught how to keep themselves and others safe, including keeping safe online.

- 13.10.5. ensure the school has appropriate filtering and monitoring systems in place on school devices and school networks, and will regularly review their effectiveness. The board will review the DfE filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting those standards, which include:
- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
 - Reviewing filtering and monitoring provisions at least annually;
 - Blocking harmful and inappropriate content without unreasonably impacting teaching and learning;
 - Having effective monitoring strategies in place that meet their safeguarding needs.
- 13.11. All Local Advisors will:
- 13.11.1. Ensure they have read and understand this section of the policy
- 13.11.2. Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet
- 13.11.3. Ensure that online safety is a running and interrelated theme while devising and implementing their whole-school or college approach to safeguarding and related policies and/or procedures
- 13.11.4. Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable
- 13.12. Trust Schools have regard to:
- [The use of social media for on-line radicalisation](#)
 - The UK Safer Internet Centre (<https://www.saferinternet.org.uk/about>)
 - CEOP's Thinkuknow website (www.thinkuknow.co.uk)
- 13.13. Pupils will be taught about online safety as part of the curriculum
- 13.14. In **Key Stage 1**, pupils will be taught to:
- 13.14.1. Use technology safely and respectfully, keeping personal information private
- 13.14.2. Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies
- 13.15. Pupils in **Key Stage 2** will be taught to:

- 13.15.1. Use technology safely, respectfully and responsibly
- 13.15.2. Recognise acceptable and unacceptable behaviour
- 13.15.3. Identify a range of ways to report concerns about content and contact
- 13.16. By **the end of primary school**, pupils will know:
 - 13.16.1. That people sometimes behave differently online, including by pretending to be someone they are not
 - 13.16.2. That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online including when we are anonymous
 - 13.16.3. The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
 - 13.16.4. How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
 - 13.16.5. How information and data is shared and used online
 - 13.16.6. What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
 - 13.16.7. How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know
- 13.17. In **Key Stage 3**, pupils will be taught to:
 - 13.17.1. Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
 - 13.17.2. Recognise inappropriate content, contact and conduct, and know how to report concerns
- 13.18. Pupils in **Key Stage 4** will be taught:
 - 13.18.1. To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
 - 13.18.2. How to report a range of concerns
- 13.19. By the **end of secondary school**, pupils will know:
 - 13.19.1. Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online

- 13.19.2. About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- 13.19.3. Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- 13.19.4. What to do and where to get support to report material or manage issues online
- 13.19.5. The impact of viewing harmful content
- 13.19.6. That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- 13.19.7. That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- 13.19.8. How information and data is generated, collected, shared and used online
- 13.19.9. How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- 13.19.10. How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)
- 13.20. The safe use of social media and the internet will also be covered in other subjects where relevant.
- 13.21. Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.
- 13.22. Educating parents about online safety
 - 13.22.1. Each school in the Trust will raise parents' awareness of internet safety in letters or other communications home, and in information via our website. This policy will also be shared with parents.
 - 13.22.2. If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the headteacher and/or the DSL.
- 13.23. Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

- 13.24. Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- 13.25. The Trust and all schools in the Trust will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the Trust and/or school.
- 13.26. More detail about the Trust and School's policies with regards to storing of photos and recordings can be found in the [CCTV Policy](#) and [Data Protection Policy](#)

14. Complaints and concerns about school safeguarding policies

- 14.1. Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).
- 14.2. Other complaints can be made through the [Complaints Policy](#).

15. Record-keeping

- 15.1. Schools will hold records in line with the Trust's records retention schedule.
- 15.2. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.
- 15.3. Records will include:
- 15.3.1. A clear and comprehensive summary of the concern
 - 15.3.2. Details of how the concern was followed up and resolved
 - 15.3.3. A note of any action taken, decisions reached and the outcome
- 15.4. Records and referrals will be kept in a separate child protection file for each child.
- 15.5. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- 15.6. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- 15.7. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

- 15.7.1. To allow the new school/college 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
- 15.7.2. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- 15.8. Most records are stored electronically. Where paper records exist, these are kept in a secure location by the DSL.
- 15.9. The DDSL(s) will have access to both electronic and paper records.
- 15.10. Information as to how the school shares information with agencies is outlined in the Parent/Carers Privacy notice.
- 15.11. Appendix 2 sets out the Trust's policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- 15.12. Appendix 3 sets out the Trust's policy on record-keeping with respect to allegations of abuse made against staff.

16. Training and CPD

- 16.1. The Circle Trust recognises that regular and appropriate safeguarding CPD is paramount.
- 16.2. The Circle Trust believes that high quality CPD is vital in supporting a safeguarding ethos and culture.
- 16.3. CPD must be provided by a suitably experienced and qualified person or approved on-line system. CPD must be compliant to the minimum standard set out in, [Keeping Children Safe in Education](#) and have regard to the Teachers Standards.
- 16.4. All safeguarding CPD must be appropriate to role and planned, monitored and reviewed annually.
- 16.5. All staff
- 16.5.1. All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

- 16.5.2. Training will include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- 16.5.3. Training will have regard to the Teachers' Standards to support the expectation that all teachers:
- Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils
- 16.5.4. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- 16.5.5. All training will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- 16.5.6. Staff will also receive regular safeguarding and child protection updates (through emails, weekly post-it note and staff meetings) as required, but at least annually.
- 16.6. Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- 16.7. Volunteers will receive appropriate training, if applicable.
- 16.8. The DSL and DDSL(s)
- 16.8.1. The DSL and DDSL(s) will undertake child protection and safeguarding training at least every 2 years.
- 16.8.2. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- 16.8.3. They will also undertake Prevent awareness training.
- 16.9. Local Advisors/Trustees/Members
- 16.9.1. All Local Advisors/Trustees/Members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:
- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding
- 16.9.2. As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.
- 16.10. It is good practice that at least one person conducting any interview for a post at the Trust school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See appendix 2 of this policy for more information about the Trust's safer recruitment procedures.
- 16.11. All staff in Trust Schools with Early Years settings who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring arrangements

- 17.1. This policy will be reviewed **annually** by The Director of Safeguarding. At every annual review, it will be approved by the Trustees.
- 17.2. In between annual reviews, the Chief Executive Officer, The Director of Safeguarding or any other officer of The Circle Trust nominated for the purpose by the Executive Headteacher are authorised to amend this Policy to reflect changes in personnel or procedure. Any such amendments shall be reported to the next meeting of the Trustees' Educational Outcomes Committee.

18. Links with other policies

- 18.1. This policy links to the following policies and procedures:
- 18.1.1. Special Educational Needs and Disabilities Policy
 - 18.1.2. Behaviour Policy
 - 18.1.3. Staff code of conduct
 - 18.1.4. Complaints Policy
 - 18.1.5. Data Protection Policy
 - 18.1.6. Health and Safety Policy
 - 18.1.7. Attendance Policy
 - 18.1.8. Equality Policy

18.1.9. Curriculum Policy

18.1.10. Acceptable Use of ICT Policy

The Circle Trust Safeguarding Policy 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 cyberbullying), 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.

The Circle Trust Safeguarding Policy Appendix 2: Safer recruitment and DBS checks – policy and procedures

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- The Trust and school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching

- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true
- We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

Disqualification under the Childcare Act 2006

All staff/volunteers within The Circle Trust must and will declare before appointment or volunteering whether they are or are likely to be disqualified pursuant to the [Childcare Act 2006](#) and the [2018 Childcare Disqualification Regulations](#).

Staff/volunteers will declare to the Headteacher immediately should they become or are likely to become disqualified at any time whilst they are employed by or volunteering for the Trust.

Particulars of any such declaration will be recorded on the SCR of settings which have children under the age of 8.

It is the responsibility of staff/volunteers to make full and prompt disclosure where applicable and in the absence of disclosure staff/volunteers will be deemed not to be disqualified.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For Trust Schools with pupils aged under 8 for self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified pursuant to the [Childcare Act 2006](#) and the [2018 Childcare Disqualification Regulations](#). Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

For Trust Schools with pupils aged under 8 in both cases, this includes checks to ensure that individuals are not disqualified pursuant to the [Childcare Act 2006](#) and the [2018 Childcare Disqualification Regulations](#).

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- For Trust Schools with pupils aged under 8, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual

falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Local Advisors, Trustees and Members

All Local Advisors, Trustees and Members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the Trustees will have their DBS check countersigned by the secretary of state.

All proprietors, Trustees, Local Advisors and Members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local advisors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

Where a Trust school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

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

The Circle Trust Safeguarding Policy Appendix 3: Allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of local advisors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school within the Trust

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

In our Early Year settings, we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

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

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

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or

person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section 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 school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school 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 on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

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.

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 as per section 7.7 of this policy
- Empowering staff to self-refer
- 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
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher 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 headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. 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 as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

We will not include low-level concerns 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

The Circle Trust Safeguarding Policy Appendix 4: [Specific safeguarding issues](#)

Children who are absent from education

A child who is absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, 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 absent 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 school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school 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, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

The school requests that all parents supply at least 2 contacts for each child and where possible, living at different addresses

Where there are any concerns of a child being absent from education, the appropriate form will be completed and returned to the Education Welfare Service.

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, young people 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 young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people 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 school or education
- Not taking part in education

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.

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, 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 or young people 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, young people 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.

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 school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are 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.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

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.

In Trust Secondary Schools we recognise 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 school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#) – if your local force is not, check your local procedures and adapt if necessary.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

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

The DSL and DDSL's will be aware of contact details and referral routes in to 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.

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.

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.

Section 7.5 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil 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 school, 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 pupil 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 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 school
 - 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.

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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

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

Preventing radicalisation

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

Schools 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.

We will assess the risk of children in our school being drawn into terrorism. 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.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil 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 pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 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 school.

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 or neglect. Nor should a victim ever be made to feel ashamed for making a report.

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 school 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 section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

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

- Increased absence from school

- 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 (see above))

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

- Being male
- Having been frequently absent or permanently excluded from school
- 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 pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

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

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child

involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Cyberbullying

Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. (See also the school behaviour policy.)

Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

All staff, governors and volunteers training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the school behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

The DSL will consider whether the incident should be reported to the police if it involves illegal material, and will work with external services if it is deemed necessary to do so.

Examining electronic devices

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on pupils' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or other member of the senior leadership team to decide whether they should:

- Delete that material, or
- Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
- Report it to the police*

* Staff may also confiscate devices for evidence to hand to the police, if a pupil discloses that they are being abused and that this abuse includes an online element.

Any searching of pupils will be carried out in line with:

- The DfE's latest guidance on [screening, searching and confiscation](#)
- UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

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

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an 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. We will not invite into the school any speaker who is known to disseminate extremist views, and

will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

Late Collection of a Child In the event of late or non collection of a child by an authorised adult the main concern of the staff will be for the safety and welfare of the child.

The school will put into practice agreed procedures to ensure that the child receives a high standard of care in order to cause as little distress as possible.

An authorised adult will be a parent, friend or relative that has been appointed by the child's parent or guardian.

Parents of all children are asked to provide specific information for school records. We will request a minimum of two contact for each child and where possible, at least one residing at a different address. It is important that if there are any changes, parents inform the school so that records can be updated and the most current details are held. Information about any person who does not have legal access to the child must also be given.

If parents are aware that they will not be at home or in their usual place of work, they should inform the school of how they can be contacted.

If parents or the persons normally authorised to collect the child are not able to collect the child, they must provide the school with written details of the name, address and telephone number of the person who will be collecting their child.

The school will agree with parents how to verify the identity of the person who is to collect their child. If parents cannot collect their child as planned, they must inform the school as soon as possible.

In the event that a child is not collected from school by an Authorised Adult within one hour of the end of the school day and the school has exhausted all efforts in contacting the parents/carers and emergency contact numbers, the school is legally required to contact Children's Social Care, for advice and guidance.

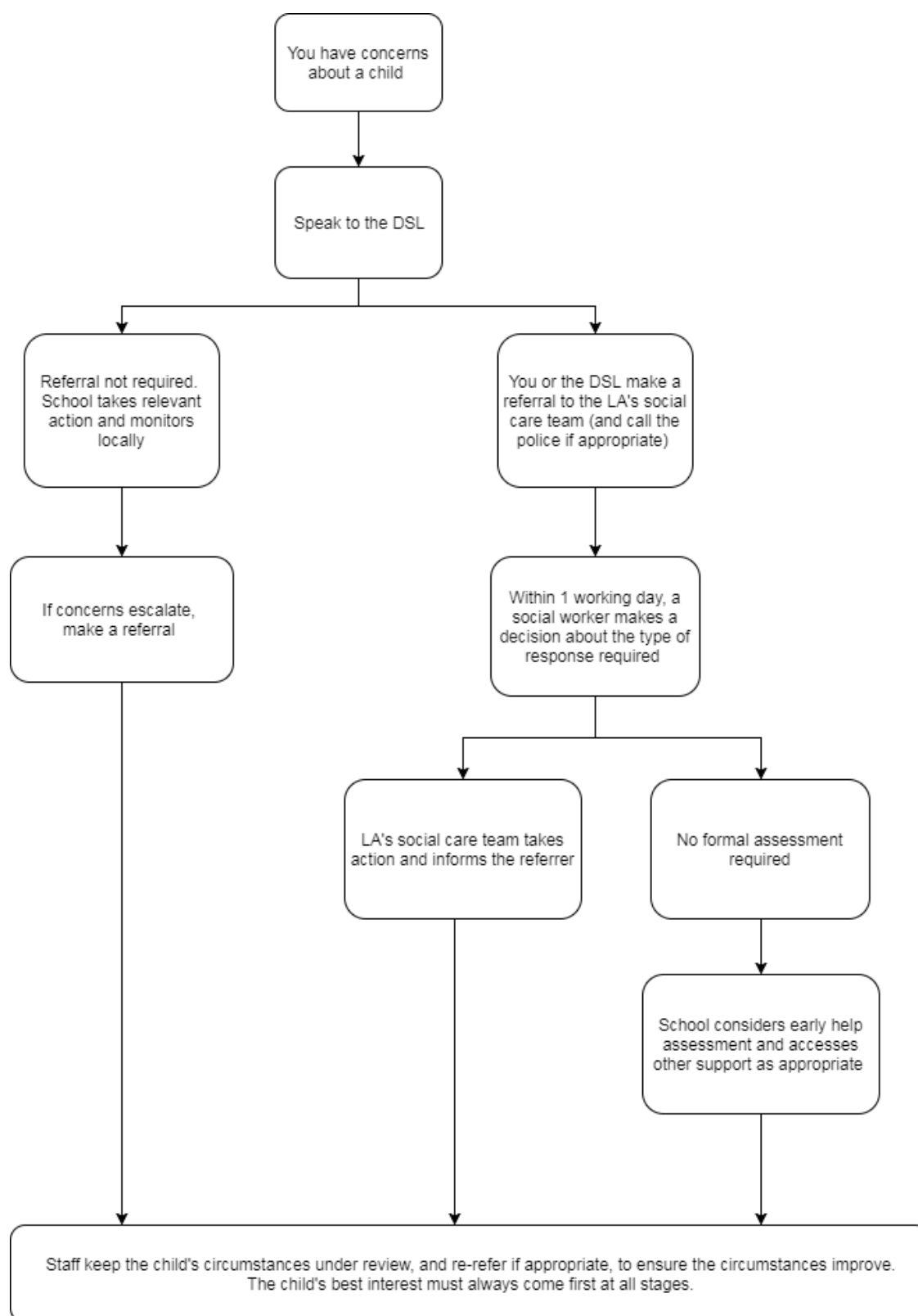
This will be recorded on the students Record of Concern and Children's Social Care will be made aware.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact the parents/carers and emergency contact numbers without delay. If there is no response from these efforts and it is assumed the child is no longer on site, the school will contact the Police.

To ensure students safety, should the school have not received communication from a parent/carer that the child will not be in school on a given day, the school will enact it's First Response to make parents aware that the child has not arrived to school. If the parent/carer believes the child is at school, once assumed the child is not on site, the school will contact the Police.

The Circle Trust Safeguarding Policy Appendix 5: Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) (Note – if the DSL is unavailable, this should not delay action. See section 7 for what to do.)



The Circle Trust Safeguarding Policy Appendix 6: Local safeguarding procedures for schools

School: Emmbrook Infant School

Designated Senior Lead(s) (DSL): Mrs Corrina Gillard (Headteacher)

Deputy Designated Senior Lead(s): Mrs Jenny Wright (Deputy Headteacher), Mrs Grace Massarella (Inclusion Manager), Mrs Jaime Barrett (School Business Manager and Office Lead)
Mrs Beccy Cooper (EYFS)

Designated LAC and PLAC Lead: Mrs Corrina Gillard (Headteacher)

Link Local Advisor: Mrs Leah Earl

The Local Authority Designated Officer (LADO) can be contacted at lado@wokingham.gov.uk

Children's Services Contact Details Wokingham Children's Services: **Phone:** 0118 908 8002 **Email:** triage@wokingham.gov.uk; Reading Children's Services: **Phone:** 0118 9373541 **Email:** ChildrensSinglePointofAccess@reading.gcsx.gov.uk; Bracknell Children's Services: **Phone:** 01344 352005 **Email:** mash@bracknell-forest.gov.uk



School: Emmbrook Junior School

Designated Senior Lead(s) (DSL): Mr Jim Usher (Headteacher)

Deputy Designated Senior Lead(s): Miss Ruth Scales (Deputy Headteacher), Mrs Chloe Liddiard (Assistant Headteacher), Mrs Nina Edwards (Family Support Worker)

Designated LAC and PLAC Lead: Mrs Chloe Liddiard (Assistant Headteacher)

Link Local Advisor: Mrs Christine Mitchell

The Local Authority Designated Officer (LADO) can be contacted at lado@wokingham.gov.uk

Children's Services Contact Details Wokingham Children's Services: **Phone:** 0118 908 8002 **Email:** triage@wokingham.gov.uk; Reading Children's Services: **Phone:** 0118 9373541 **Email:** ChildrensSinglePointofAccess@reading.gcsx.gov.uk; Bracknell Children's Services: **Phone:** 01344 352005 **Email:** mash@bracknell-forest.gov.uk



School: Emmbrook School

Designated Senior Lead(s) (DSL): Mrs Roxy Ridsdale (Deputy Headteacher)

Deputy Designated Senior Lead(s): Mr Craig Johnson (Assistant Headteacher), Miss Ellie Fry (Assistant Headteacher), Mrs Steph Guinn (Business Manager), Miss Ellie Horne (Head of Year 7) and Mrs Susan Woolfenden (Pastoral Welfare Manager)

Designated LAC and PLAC Lead: Mrs Roxy Ridsdale (Deputy Headteacher)

Link Local Advisor: Mr Claymore Richardson

The Local Authority Designated Officer (LADO) can be contacted at lado@wokingham.gov.uk

Children's Services Contact Details Wokingham Children's Services: **Phone:** 0118 908 8002 **Email:** triage@wokingham.gov.uk; Reading Children's Services: **Phone:** 0118 9373541 **Email:** ChildrensSinglePointofAccess@reading.gcsx.gov.uk; Bracknell Children's Services: **Phone:** 01344 352005 **Email:** mash@bracknell-forest.gov.uk



School: Nine Mile Ride

Designated Senior Lead(s) (DSL): Mr Holden Whitaker (Headteacher)

Deputy Designated Senior Lead(s): Mrs Nicola York (Deputy Headteacher)
Mrs Clare Demblon (Inclusion Manager)

Designated LAC and PLAC Lead: Mrs Clare Demblon (Inclusion Manager)

Link Local Advisor: Mrs Rebecca Margetts

The Local Authority Designated Officer (LADO) can be contacted at lado@wokingham.gov.uk

Children's Services Contact Details Wokingham Children's Services: **Phone:** 0118 908 8002

Email: triage@wokingham.gov.uk; Reading Children's Services: **Phone:** 0118 9373541 **Email:** ChildrensSinglePointofAccess@reading.gcsx.gov.uk; Bracknell Children's Services: **Phone:** 01344 352005
Email: mash@bracknell-forest.gov.uk



School: Shinfield Infant and Nursery School

Designated Senior Lead(s) (DSL): Mrs Nicky Lauchlan (Headteacher)

Deputy Designated Senior Lead(s): Mrs Zoe Foldvari (Early Years Lead),
Claire Summers (Deputy Head) and Lisa Ward (Parent Support Advisor)

Designated LAC and PLAC Lead: Charlotte Massey

Link Local Advisor: Mrs Catherine Foley

The Local Authority Designated Officer (LADO) can be contacted at lado@wokingham.gov.uk

Children's Services Contact Details Wokingham Children's Services: **Phone:** 0118 908 8002 **Email:** triage@wokingham.gov.uk; Reading Children's Services: **Phone:** 0118 9373541 **Email:** ChildrensSinglePointofAccess@reading.gcsx.gov.uk; Bracknell Children's Services: **Phone:** 01344 352005 **Email:** mash@bracknell-forest.gov.uk



School: St Crispin's School

Designated Senior Lead(s) (DSL): Mr Railton Blyth (Senior Deputy Headteacher)

Deputy Designated Senior Lead(s): Ms Rachel Zell (Deputy Headteacher),
Mrs Kiran Sharma (Assistant Headteacher), Mr T Regan (Assistant Headteacher) and
Ms Kylie Pinsent (Assistant Headteacher)

Designated LAC and PLAC Lead: Mr Railton Blyth (Senior Deputy Headteacher)

Link Local Advisor: Mrs Jess Goves

The Local Authority Designated Officer (LADO) can be contacted at lado@wokingham.gov.uk

Children's Services Contact Details Wokingham Children's Services: **Phone:** 0118 908 8002 **Email:** triage@wokingham.gov.uk; Reading Children's Services: **Phone:** 0118 9373541 **Email:** ChildrensSinglePointofAccess@reading.gcsx.gov.uk; Bracknell Children's Services: **Phone:** 01344 352005 **Email:** mash@bracknell-forest.gov.uk



School: Wescott Infant School

Designated Senior Lead(s) (DSL): Mrs Stephanie Holding (Headteacher)

Deputy Designated Senior Lead(s): Eleanor Pace (Deputy Headteacher), Kirsten Rack-Cooper (School Business Manager)

Designated LAC and PLAC Lead: Mrs Stephanie Holding (Headteacher)

Link Local Advisor: Mr Neil Campbell

The Local Authority Designated Officer (LADO) can be contacted at lado@wokingham.gov.uk

Children's Services Contact Details Wokingham Children's Services: **Phone:** 0118 908 8002 **Email:** triage@wokingham.gov.uk; Reading Children's Services: **Phone:** 0118 9373541 **Email:** ChildrensSinglePointofAccess@reading.gcsx.gov.uk; Bracknell Children's Services: **Phone:** 01344 352005 **Email:** mash@bracknell-forest.gov.uk



School: Westende Junior School

Designated Senior Lead(s) (DSL): Mrs Andrea Sykes (Headteacher)

Deputy Designated Senior Lead(s): Matt Smith (Deputy Headteacher), Lee Kitson (Assistant Headteacher), Midge Robinson (SENDCo)

Designated LAC and PLAC Lead: Midge Robinson (SENDCo)

Link Local Advisor: Mrs Louise Huggins

The Local Authority Designated Officer (LADO) can be contacted at lado@wokingham.gov.uk

Children's Services Contact Details Wokingham Children's Services: **Phone:** 0118 908 8002 **Email:** triage@wokingham.gov.uk; Reading Children's Services: **Phone:** 0118 9373541 **Email:** ChildrensSinglePointofAccess@reading.gcsx.gov.uk; Bracknell Children's Services: **Phone:** 01344 352005 **Email:** mash@bracknell-forest.gov.uk



The Circle Trust Safeguarding Policy Appendix 7 – Key roles within The Circle Trust



Role	Name	Contact Details
Designated Trustee for Safeguarding	David Walker	Dwalker@thecircletrust.co.uk
Director of Safeguarding	Railton Blyth	0118 3381961 railton@thecircletrust.co.uk
Deputy Designated Person for Safeguarding The Circle Trust	Ali Brown	ali@thecircletrust.co.uk
LA Safeguarding Contact/LADO (Local Area Designated Officer)	LADO	0118 974 6141 LADO@wokingham.gov.uk
Whistle blowing regarding Headteachers to the Chief Executive Officer	Ginny Rhodes Chief Executive Officer	ginny@thecircletrust.co.uk
Whistle blowing regarding the Chief Executive Officer to the Chair of the Trustees	Andrew Beckett Chair of the Trustees	chairoftrustees@thecircletrust.co.uk

The Circle Trust Safeguarding Policy Appendix 8 – Key roles within the Local Authority

	Name	Address	Telephone contact	Email
Contact, Advice & Assessment Service (CAAS)	Duty Social worker	Duty, Triage & Assessment Team Council Offices Shute End Wokingham Berkshire RG40 1BN	Contact: 0118 908 8002 or Emergency Duty Team (outside of office hours) Tel: 01344 786543 Fax: 01344 786535	triage@wokingham.gov.uk
Prevent Officer Thames Valley Police	Prevent officer	Reading Police Station Castle Street Reading RG1 7TH	07788 307178	Preventreferrals@thamesvalley.pnn.police.uk
Community Safety Partnership Manager and PREVENT Lead, WBC	Narinder Brar	Council Offices Wokingham Berkshire RG40 1BN	07979255308	Narinder.brar@wokingham.gov.uk
Service Manager Early Years		Council Offices Shute End Wokingham Berkshire RG40 1BN	0118 908 8260	EarlyYears@wokingham.gov.uk
Local Authority Designated Officer (LADO)		Council Offices Shute End Wokingham Berkshire RG40 1BN	0118 974 6141	LADO@wokingham.gov.uk
Wokingham Education Welfare				https://wsh.wokingham.gov.uk/learning-and-

				teaching/education-welfare/
Wokingham Virtual School				virtualschool.admin@wokingham.gov.uk
Berkshire West Safeguarding Partnership		Council Offices Shute End Wokingham Berkshire RG40 1BN		https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp