Bromley Trust Academy

Midfield Campus

Safeguarding Policy

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1. Introduction to Safeguarding London South East Academies Trust

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We will provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow established procedures to ensure that children receive effective prevention, intervention and protection.

- It is everyone's responsibility to safeguard and promote the welfare of children.
- Children includes everyone under the age of 18.
- Children who are and feel safe make more successful learners.
- Policies will be reviewed annually, unless an incident, new legislation or guidance suggests the need for an earlier review.
- The Trust Safeguarding policy has been revised to reflect "Keeping Children Safe in Education" (September 2021) and "Working Together to Safeguard Children" (July 2018).

The procedures contained in this policy apply to all staff and Trustees and are consistent with those of Local Safeguarding Children Partnerships and statutory safeguarding children partnership arrangements with our key partners.

Principles

- The London South East Academies Trust will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities, creating a culture of effective safeguarding.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection; Trust schools should act in the best interests of the child at all times. School leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm in accordance with this guidance; all staff should be aware that safeguarding and promoting the welfare of children is everyone's responsibility and identify children that may benefit from early help.
- All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the school who will then follow this policy guidance in dealing with such matters.

Aims

- To provide all staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children.
- To ensure consistent good practice across the Trust Schools.
- To demonstrate the Trust's commitment to safeguarding children.

This policy should be read in conjunction with:

- LSEAT e-Safety Policy
- LSEAT Preventing Extremism and Radicalisation Policy
- LSEAT Sexual Violence and Harassment Policy
- Trust Staff Code of Conduct

1.1 Safeguarding Legislation and Guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018), and the Governance Handbook.

To safeguard and promote the welfare of children, LSEAT will act in accordance with the following legislation and guidance:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Primary Schools Only: 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
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

We work in partnership with the local authority and assess each child's level of need against localised threshold frameworks:

- Bromley Threshold Document

1.2 Duty of Care

Safeguarding incidents could happen anywhere and staff should be alert to possible concerns being raised in school.

Staff must take reasonable care to ensure that pupils do not meet with foreseeable injury. They have a duty to protect the children against foreseeable risks of personal injury or harm.

- There must be an effective system of supervision in operation in the school.
- The duty of care applies while the pupils are on the school premises during school opening hours. It may also apply if the pupils are present outside of official school hours, e.g. if they arrive early or leave late and the teacher/school has agreed to the pupils being present.

The same duty of care applies if a teacher voluntarily supervises children.

Teachers are required to follow good standards and approved practice. Some classes and activities require a greater degree of supervision. If goggles, protective clothing, etc. are supplied for certain activities, it is the teacher's duty to ensure that they are worn. If there is an adventurous activity then a written risk assessment will be completed by the class teacher, approved by the SLT and followed when such activities are carried out.

All members of staff must remain vigilant at all times as Safeguarding is Everyone's Responsibility

1.3 Safeguarding Children within the Context of a Special School

At Bromley Trust Academy we recognise that children with special educational needs and disability, (SEND), are three times more likely to be abused than neurotypical peers. For example, some may have speech, language and communication needs which make it difficult to tell others what is happening.

We will ensure that all our pupils and specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

All staff will be mindful of the fact that our pupils can be disproportionally impacted by safeguarding concerns including peer on peer abuse.

Staff should not assume that possible indicators of abuse such as behaviour/mood change or injuries are related to the child's disability and to remain vigilant and mindful that children with SEND may not always outwardly display indicators of abuse.

2. Designated Safeguarding Team and Key Roles

2.1 The Role of the Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. The DSL is Paul Bailey – Assistant Head of School. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the deputies – Deborah Blake and Rob Freeman will act as cover.

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

The DSL will also keep the Head of school / Headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description in line with KCSIE 2021.

2.2 The Role of Head of School / Head Teacher

The Head of School / Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

Early years providers and primary schools:

- Ensuring the relevant staffing ratios are met, where applicable

Early years providers:

- Making sure each child in the Early Years Foundation Stage is assigned a key person

2.3 The Role of the Trust and Provision Boards

The Trust and Provision Boards will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Appoint a link trustee to monitor the effectiveness of this policy in conjunction with the Trust Board. The link trustee will not be a member of staff at the School.

The Chair of Board will act as the 'case manager' in the event that an allegation of abuse is made against the Deputy CEO.

All trustees will read Keeping Children Safe in Education in its entirety.

2.4 The Role of the Trust

The Trust will supply support and guidance to the Head Teacher/Head of School and the DSL. The Group Head of Safeguarding can be consulted for advice and guidance but the decision-making regarding safeguarding remains at School level.

The Trust will also monitor the quality of safeguarding through regular audits and monitoring visits (See Appendix One).

2.5 Key Safeguarding Contacts

Name	Role	Contact Details
Paul Bailey	Designated Safeguarding Lead Assistant Head of School	Phone: 0208 308 9620 paul.bailey@bromleytrustacademy.org.uk
Debbie Blake	Deputy Designated Safeguarding Lead Welfare Officer	Phone: 0208 308 9620 debbie.blake@bromleytrustacademy.org.uk
Rob Freeman	Head of School	Phone: 0208 308 9620 rob.freeman@bromleytrustacademy.org.uk
Beth Moore	Group Head of Safeguarding; London South East Education Group	beth.moore@lsec.ac.uk
Neil Miller	Deputy CEO; London South East Academies Trust	neil.miller@bromleybeaconacademy.org.uk
Janet Saunders Denise James-Mason	Safeguarding Link Trustees for the Trust and Provision Boards	Contact the Governance Professional: Jennifer Pharo jennifer.pharo@lsec.ac.uk

3. Early Help

In line with WTTSC 2018 the Trust supports the view that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years.

Effective early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child. Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency cooperation to improve the welfare of children and it is stated that schools are an important partner for the local authorities in which they operate.

School staff are particularly well placed to be alert to the potential need for early help for a child or young person who:

- is disabled and has specific additional needs;
- has special educational needs;
- has a mental health need;
- is looked after or a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- is frequently missing from care or home;
- is it risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as FGM or Forced Marriage;
- is a privately fostered child;
- is showing early signs of abuse and/or neglect; and
- is persistently absent from education, including persistent absences for part of the school day.

School staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share information and work together to give children/young people the help they need. Staff receive training to develop their knowledge and skills in this area.

Where staff identify a cause for concern they should discuss this with a DSL. The DSL will make a referral if this is appropriate with the local multi-agency safeguarding hub for the local authority area in which the child lives. Staff and students (where this is possible and appropriate) will be kept informed about the actions taken once the concerns are shared with the DSL. The local multi-agency threshold document for the local authority area where the school is going to make referral should be consulted.

If at any time it is considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to local authority children's social care. This referral can be made by any professional.

A child in need is defined under section 17 of the Act as a child whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired, without the provision of additional services. A child with a disability is a child in need.

4. Procedures for Manging Concerns and Disclosures

4.1 Suspicion of Harm

Safeguarding concerns often do not arise from a child disclosing but from a member of staff observing signs that there may be a concern. For example, this may be a change in behaviour, an unusual piece of writing or artwork or change in physical appearance.

In these circumstances staff should talk to the child, without asking leading questions, to ascertain if the child wants to share anything or if there is anything the school can help with.

Safeguarding concerns and any discussions with the child, including follow up actions, must be recorded on CPOMS/Behaviour Watch and discussed with the DSL.

If the child does begin to reveal that they are being harmed staff should follow the advice in the section 'If a child discloses to you'.

4.2 Responding to Disclosures

School staff who have regular contact with pupils are well placed to observe significant changes in a child's behaviour, a failure to thrive, outward signs of abuse or behaviour which may indicate a risk of being drawn into terrorism or other concerns. In addition, children may choose to share their concerns with staff they feel they can trust and with whom they are comfortable.

Staff need to know how to respond sensitively to a child's concerns and who to approach for advice. Whilst School staff are not responsible for investigating abuse it is essential that any disclosures or suspicions of significant harm, allegations of abuse, or concerns over potential radicalisation, are acted on and treated seriously.

The School takes a holistic view of the welfare of its pupils and recognises that a wide range of contextual factors may be impacting on the wellbeing of a child. These are likely to include family circumstances, friendship groups, the presence of specific vulnerabilities

(see Early Help), attendance and behaviour and learning differences. The DSL will consider the full picture in dealing with cases brought to their attention.

The following guidelines should be followed by **all** staff receiving a disclosure:

- Stay calm and reassure the child that s/he is right to tell someone of their concerns.
- **Do not promise confidentiality.** Be honest - explain that you need to pass the information on and why while reassuring them that only the people who need to know will be told. The child can accompany you if s/he wishes.
- Allow the child to speak in their own way and at their own pace, avoid interrupting when they are recalling significant events.
- Do not be judgemental but make a professional assessment about the likelihood of harm occurring.
- Do not 'interview' the child; do not ask leading questions. Ask factual questions to gather as much information as possible and to create a full picture of what has happened so that this can be reported to a safeguarding officer. Use the 4W's – who, what, when, where to guide you.
- Only clarify what the child is trying to say and ascertain whether there are any immediate issues of safety for the them or any other children.
- **Notify the DSL** noting as accurately as possible what was said using the child's own words. Include the time, context and location of the disclosure.
- Do not investigate any suspicions, allegations or incidents of abuse, but report them within the hour (or as soon as practicable) to a DSL and record your concern on CPOMS.
- Do not contact the child's parents/carers. The DSL will seek advice from the local authority Children's Services, local Prevent Coordinator or other agency as appropriate.
- Where there is a concern that a child is experiencing, may already have experienced abuse or neglect, is suffering or is likely to suffer 'significant harm' the Designated Safeguarding Lead will refer immediately to Children's Social Care (CSC) at the appropriate local authority.
- Where there is concern of an immediate threat to life emergency services must be contacted immediately
- In exceptional circumstances, if the Designated Safeguarding Leads are not available advice should be sought from a member of the Senior Leadership Team, who will liaise with the required services as appropriate. All staff have a right and responsibility to refer concerns directly to CSC if necessary.

4.3 Notifying parents

The Designated Safeguarding Leads will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the DSL believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's social care.

5. Abuse and Safeguarding Concerns:

5.1 Indicators of Abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

Staff are responsible for reporting their concerns to the DSL and should not investigate their concerns.

A child who is being abused and/or neglected may:

- Have bruises, bleeding, burns, fractures, or other injuries,
- Show signs of pain or discomfort,
- Keep arms and legs covered, even in warm weather,
- Be concerned about changing for PE or swimming,
- Look unkempt and uncared for,
- Change their eating habits,
- Have difficulty in making or sustaining friendships,
- Appear fearful,
- Be reckless about their own or other's safety,
- Self-harm,
- Frequently miss school or arrive late,
- Show signs of not wanting to go home,
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn,
- Challenge authority,
- Become disinterested in their schoolwork,
- Be constantly tired or preoccupied,
- Be wary of physical contact,
- Be involved in, or particularly knowledgeable about drugs or alcohol, or,
- Display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that all concerns are reported; 'absolute proof' is not needed that a child is at risk.

5.2 Abuse

To ensure that all our children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse can take place online or in conjunction online and in daily life.

All staff should be aware that safeguarding incidents and poor behaviours can be associated with factors outside the school and/or can occur between children outside of school. This links closely with contextual safeguarding and specific children being more at risk due circumstances that they live in.

There are four main categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

5.3 Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as Fabricated or Induced Illness).

5.4 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age, or developmentally, inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another or may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

5.5 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

5.6 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure to ensure access to appropriate medical care or treatment.

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

5.7 Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of mental health problems. School staff are well placed however to identify those whose behaviour suggests that they may be experiencing a mental health problem or at risk of developing one.

Where children have suffered abuse and neglect or any other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is vital that staff are aware of how these experiences can impact on mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following normal procedures.

5.8 Child Criminal Exploitation (including County Lines)

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 should 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.

County Lines is a term used for gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated phone lines or other forms of deal line. They target vulnerable groups of children. The victims carry the drugs/ money and in return are offered, promised or given something in return – tangible such as cash, drugs or clothes or intangible such as status or protection. There is a direct link with CSE and CCE due to the imbalance of power. Victims can be coerced into county lines to prevent something negative happening to themselves or their family. The Government has now created a National Referral Mechanism (NRM) to support multi agency approach and unified approach by police forces.

5.9 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.

5.10 Children Missing from Education

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

A child going missing from education is a potential indicator of abuse or neglect. School staff should follow the school's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM, forced marriage and Child Criminal Exploitation.

The law requires all schools to have an admission register and an attendance register. All pupils must be placed on both registers.

All Trust Schools must inform their local authority of any pupil who is going to be deleted from the admission register following The Education (Pupil Registration) (England) (Amendment) Regulations 2016.

The local authority must be notified when a school is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty, identify children missing from education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more.

5.11 So Called 'Honour Based Abuse' (HBA)

These encompass incidents or crimes which have been committed to protect or defend the honour of the family and/or community and includes FGM, forced marriages and practices such as breast ironing. This type of abuse often involves a wider network of family or community pressure and can include multiple perpetrators.

Any type of suspected HBA should be reported to the DSL and then local safeguarding procedures will be activated.

5.12 Female Genital Mutilation

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

As part of our RSE curriculum, FGM and other harmful practices, including forced marriage and honour based abuse will be covered. The school will ensure that students are taught the concepts of, and laws relating to forced marriage, honour-based violence and FGM, and how these can affect current and future relationships.

Actions

If staff have a concern regarding a girl that might be at risk of FGM they should inform the DSL. Since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach where FGM has taken place (see following section).

Mandatory Reporting

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

5.13 Forced marriage

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

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
- 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

5.14 Domestic Violence

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/ or violence can have serious, long lasting emotional and psychological impact on children.

Operation Encompass allows police and schools to work together to provide emotional and practical help to children. Police will inform a key person at school if they have attended an incident of domestic violence/ abuse. This will allow the school to provide essential support for the child.

5.15 Peer on Peer Abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer 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 peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes 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.

5.16 Sexual Violence and Harassment

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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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.

Staff should refer to the Trust's Sexual Violence and Harassment Policy for more information.

5.17 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.

5.18 Radicalisation and Extremism

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

- 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.

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

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

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 should discuss their concerns with the DSL and record on CPOMS/Behaviour Watch.

Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation is set out in the Preventing Extremism and Radicalisation Policy.

5.19 The Impact of Abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

5.20 Responding to a Concern

Key points to remember for taking action are:

- In an emergency where a child is in immediate danger or at risk of harm take the action necessary to help the child and inform the DSL and/or a member of SLT immediately.
- If your concern is not an emergency report your concern to the DSL before the end of the day.
- If the DSL/Deputy DSL is not available, ensure the information is shared with the most senior person in the school that day and ensure action is taken to report the concern to children's social care (if applicable).
- Do not start your own investigation.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.
- Write up your concern on CPOMS/Behaviour Watch including factual information only
- Seek support for yourself if you are distressed.

5.21 Referrals to Children's Social Care

The DSL will make a referral to children's social care, in line with local reporting arrangements and thresholds, if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

5.22 Reporting Directly to Children's Social Care

Staff should follow the reporting procedures outlined in this policy.

However, they may also share information directly with children's social care, police or the NSPCC if:

- The situation is an emergency and the designated senior person, their deputy, and the Head Teacher are unavailable.
- They are convinced that a direct report is the only way to ensure the child's safety.

6. Online Safety

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.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- 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')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

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

To meet our aims and address the risks above we will:

- 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 are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- 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
- 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
- Make all pupils, parents/carers, staff, volunteers and governors 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
- 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
- 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
- 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

This section summarises our approach to online safety and mobile phone use. For comprehensive details please view the Trust's e-safety policy.

7. Confidentiality, Sharing Information and Record Keeping

All staff must understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child, but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the designated person, Head of School/Headteacher, Group Head of Safeguarding, Deputy CEO Trust or Chair of Trust Board (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with General Data Protection Regulation 2018 and Data Protection Act 1988. Information is:

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

Records are kept on a secure server CPOMS/Behaviour Watch. All written records must be stored in a locked facility and information sent electronically must be password protected and made available to relevant individuals.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. No child protection information will be stored on portable media, such as a CD or flash drive. Child protection information will be stored separately from the child's 'school file' and the 'school file' will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a subject information request from a child or parent to see child protection records, they should refer the request to the Head of School/Headteacher.

The GDPR and Data Protection Act does not prevent school staff from sharing or withholding information with relevant agencies, where that information may help to protect a child.

The Trust's policy on confidentiality and information-sharing is available to parents and children on request.

It is also important to refer to DfE Guidance on Information Sharing (2015) and to Keeping Children Safe in Education 2021 Page 88 Paragraph 375 regarding Allegations Against Staff.

7.1 Record Keeping and Transferring Files

All concerns, discussions, decisions made and reasoning for decisions must be recorded on CPOMS/Behaviour Watch.

Records should include:

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

When a child transfers to a new school, either at the start of an academic year or mid-year, their child protection file must transfer to the new school within five working days. This should be transferred separately from their main pupil file, sent securely and confirmation of receipt obtained. The school must also consider if there is other information that should be shared prior to the transfer to help safeguard or support that can be put in place.

8. Children with a parent or close relative in prison or at risk of custodial sentence.

The London South East Academies Trust is committed to support the children and young people who have a parent or close relative in prison and will:

- Raise awareness of the needs of the pupils with a parent or close relative in prison.
- Secure the educational achievement and attendance of those pupils during their time in our school.
- Promote their social inclusion and equal opportunities within our school community.

The DSL or Deputy DSL for the relevant site will be appointed as 'Designated Person for Children of Prisoners' and their role will include:

- Keeping the Head of School/ Headteacher fully informed of pupils with a parent in prison.

- Liaise with other relevant school staff on a 'need to know' basis.
- Provide a point of contact in the school for external agencies in order to share information.
- Liaise with the family and seek their consent to provide additional support for the child as necessary.
- Liaise with other statutory and voluntary agencies as appropriate.
- Promote the use of the Common Assessment Framework (CAF) (Early Help) to identify the needs of the child unless a Core Assessment has been completed.
- Consider convening a multi-agency meeting to address the needs of the child and to identify a key worker for that child following the completion of a CAF (Early Help).
- Consider the use of an individual education plan for the child concerned.
- Monitor the achievement, attendance and behaviour of the child with a parent or close relative in prison.
- Act as an advocate for children with a parent/ close relative in prison, particularly if the child is a Looked After Child (LAC) as they often have lower rates of visiting a parent in prison.
- Consider purchase of books and resources on the subject of prisons and prisoners for the school library.
- Keep appropriate and current records with reference to information sharing.

9. Supporting Young Carers

The London South East Academies Trust believes that all children and young people have the right to an education, regardless of what is happening at home. When a young person looks after someone in their family who has a serious illness, disability or substance misuse problem, he or she may need extra support to help them get the most out of school. We will help any pupil who helps to look after someone at home.

Bromley Trust Academy will:

- Designate a member of staff with special responsibility for young carers. This member of staff will introduce themselves and their responsibilities to all new pupils.
- Run PSHE lessons including the challenges faced by young carers during year.
- Consider referring young carers to the local Young Carers Service and identify other support groups in the community.
- Ensure we are accessible to parents who have mobility and communication difficulties and ensure they are given the opportunity to be involved in Academic Review Days.
- Respect right to privacy and only share information with those who need to know.

- Consider alternatives if a young carer is unable to attend out of school activities e.g. detention, sports coaching, concerts, due to their caring role.
- Allow young carers to telephone home during breaks and lunchtimes.
- Provide advice to parents regarding transporting their children to school where there are difficulties in this area.

10. Looked-after and previously looked-after children

The School 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:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Paul Bailey – Assistant Head of School, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- 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. Allegations against staff

11.1 Concerns about a colleague

Staff who are concerned about the conduct of a colleague (including supply staff and volunteers) towards a child may consider themselves placed in a difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career or their future professional relationship with that colleague.

All staff must remember that the welfare of the child is paramount. The Trust's whistle blowing code enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns include:

i) Behaved in a way that has harmed a child, or may have harmed a child;
ii) Possibly committed a criminal offence against or related to a child;
iii) Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
iv) Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

All concerns should be reported to the Head of School/ Headteacher at the earliest opportunity. Complaints about the Headteacher should be reported to the Deputy CEO. Complaints about the Deputy CEO should be made to the Chair of the Trust Board.

If a staff member feels unable to raise an issue or their concerns are not addressed, other whistleblowing channels may be open including NSPCC Whistleblowing helpline.

11.2 Staff who are the subject of an allegation

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some adults do pose a serious risk to children's welfare and safety and we must act on every allegation made. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

The full procedures for dealing with allegations against staff can be found in Keeping Children Safe in Education September 2021 pages 81 - 98. Schools must follow the procedures outlined in the Staff Disciplinary Policy.

For further information on managing allegations against staff contact your Local Authority Designated Officer (LADO) at the following email address:

lado@bromley.gov.uk

lado@bexley.gov.uk

lado@surreycc.gov.uk

11.3 Allegations against Supply Staff

If an allegation is made against a member of staff who is not directly employed by the School, the School will liaise and work with the Agency and the LADO. Consideration of both the Schools and the Agencies policies will form a joint decision about the outcome of an internal investigation.

11.4 Parents and Carers

Parents and carers of the child or children involved should be formally told about the allegation as soon as possible. Consultation with the LADO should take place regarding what information can be disclosed and communication should remain open throughout the process so parents and carers are informed about the progress of the case in relation to their child; no information can be shared regarding staff members.

11.5 Anonymity and Confidentiality

It is extremely important that when an allegation is made, the school or college makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 (amended 2011) introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public”. This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

11.6 On Conclusion of Case

If the allegation is substantiated the DSL, Case Manager and HR should agree if the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required and in the case of a member of teaching staff, whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school or college.

12. Safer Recruitment

The London South East Academies Trust endeavours to ensure that we do our utmost to employ 'safe' staff by following Part Three of Keeping Children Safe in Education September 2021.

Safer recruitment covers all aspects of the recruitment process from advertising the role to inducting the new member of staff into the organisation.

A safer recruitment process must include:

- An advert which clearly outlines the required skills, behaviours and experience for the post and the safeguarding requirements for the role. The advert must include the School's commitment to safeguarding and the post holders responsibilities;
- An application form that collects personal details, employment history (and reason for leaving) and explanations for any gaps in employment, qualifications, reference contacts and a statement outlining suitability against person specification;
- Shortlisting process; at least two people must shortlist and check for gaps in employment and inconsistencies;
- References – one from current/last employer and one from last time working with children
- Interview process which assesses safeguarding knowledge and understanding of working with vulnerable children
- ID check
- Enhanced DBS (those working in regulated activity)
- Children's barred list check (if working in regulated activity before the DBS certificate is available)

- Mental and physical fitness verification
- Right to work in the UK
- Verify professional qualification (QTS checked through TRA Employer Access Service)

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

All new members of staff will undergo an induction that includes familiarisation with the Trust's safeguarding and child protection policy and identification of their own safeguarding and child protection training needs. All staff will sign to confirm they have received a copy of the child protection policy.

12.1 DBS Checks and London South East Education Group Roles

All staff hired by the Trust will complete a DBS renewal every three years which is to be recorded on the Single Central Record.

Staff who work in Group wide roles and working within the Trust are also required to have a DBS check every three years. This is to be recorded on the London South East College Single Central Record and confirmed with all Schools.

12.2 Single Central Record

The Single Central Record is maintained by each school and must include all elements outlined in KCSIE 2021 outlined in paragraph 253. It is the responsibility of the Headteacher / Head of School to ensure that the SCR is in date.

13. Staff Training

13.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the 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 integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- 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

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Volunteers will receive appropriate training, if applicable.

13.2 The DSL and Deputy DSLs

The DSL team and will undertake child protection and safeguarding training at least every 2 years.

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).

They will also undertake Prevent awareness training.

13.3 Governors and Trustees

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

As the Chair of Trust Board may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Deputy CEO, they receive training in managing allegations for this purpose.

14. Extended school and off-site arrangements

Where 'extended school' activities are provided by and managed by the provision, the School's safeguarding and child protection policy and procedures apply. If other organisations provide services or activities on school site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When pupils attend off-site activities including Alternative Provision or Work Experience, the School will check that effective child protection arrangements are in place.

15. Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have appropriate safeguards in place. To protect children we will:

- Seek the consent of both parents and children for photographs to be taken or published (for example, on our website or in newspapers or publications),
- Use only the child's first name with an image,
- Ensure that children are appropriately dressed,
- Encourage children to tell us if they are worried about any photographs that are taken of them

Appendix One: School and Trust Responsibilities

Safeguarding Responsibilities and Accountabilities

Responsibility		
	School	**Trust**
Safeguarding Policy	Schools to add localised information to the template provided and add to school website by the 6th September 2021.	The Trust will provide by the 1st September 2021 a template which contains statutory information to all schools.
Safeguarding Information on Website	Localised information to be added to the Trust template by the 6th September and added to website.	Trust will provide a statement to go on all school websites by the 1st September 2021.
Safer Recruitment Checks	All safer recruitment checks to be completed by the school with HR support.	Trust will audit processes termly
Single Central Record	Single Central Record to be maintained by the school and HR to the standards outlined in KCSIE.	Trust will audit the Single Central Record termly
Concerns about a member of staff/referrals to the LADO	If there are concerns that a member of staff poses a risk to pupils then the DSL and Head must decide whether to refer to the LADO (see local authority guidance on how to refer and thresholds). The LADO can be consulted for advice prior to referrals. If a referral is made to the LADO please ensure that HR and Group Head of Safeguarding are notified.	Trust can be contacted for advice and guidance but the decision to refer sits within the school. Trust may attend LADO meetings to provide support and wider context regarding the Trust.
Induction of new staff	The implementation of Induction and Probationary processes sits within the school and supported by HR.	Trust will review induction processes and may make recommendations for standardisation or development.
Annual Refresher Training	DSL's to adapt template to add localised information. DSL's to deliver training to all staff at the beginning of the academic year and ensure that attendance is recorded on the SCR.	Trust will provide a template for the annual refresher training to schools by the 27th August 2021.
DSL Team and Training	It is the responsibility of the Head to ensure that a DSL and a DDSL is in place (as a minimum)	Trust will provide recommendations for DSL training and Trust will audit annually.

	and they are appropriately trained in line with KCSIE.	
DSL Development and Support	Line management procedures to be in place to identify development needs and wellbeing support.	Trust will provide support to DSL's through half termly DSL Networks, regular safeguarding updates and additional supervision if required.
Safeguarding Supervision	DSLs and DDSls must have access to safeguarding supervision during the school day.	Trust will be providing guidance on the minimum requirements for supervision.
Staff and Students feel safe at school and know how to get support	Head has the responsibility to ensure that staff and students feel safe at school.	Trust can provide advice on how to measure and provide suggestions for improvements.
Safeguarding Themes in RSHE sessions	Curriculum planning and implementation responsibility sits within the school. Sessions should be reviewed through standard quality procedures.	Trust may provide additional resources and external support to develop curriculum and delivery if requested or identified as a requirement.
Reporting to Trust and Provision Boards	Heads will be contacted to provide information to feed into Governor/Trust reports.	Provision Boards: Trust will provide support to nominated DSLs to report to Provision Boards Trust Board and Committees: Trust will report on behalf of schools. Group Board and Committees: Trust will report on behalf of schools.

Accountability		
	Schools	**Trust**
Ofsted	Schools are accountable to Ofsted and need to ensure that safeguarding arrangements are effective.	Trust will provide support in preparing for inspections and will be available to support through inspection periods if required.
LADO	Schools are accountable to LADO processes and must follow threshold documents for local authority LADO.	Trust can support in preparing for LADO meetings and may attend the meetings if beneficial to the school, LADO or Trust. Trust is accountable to the LADO for Trust wide concerns.

Local Authority	School is accountable to respond to requests from the local authority.	Trust is accountable for providing Trust wide information and reporting if required.
Governing and Corporation Boards	School is accountable to Trust to provide any required information for reporting.	Trust is accountable to Governance structures and will represent the schools. DSL representatives will be nominated to represent at Provision Boards.
London Southeast Education Group Executive		Trust is accountable to GEX to provide reassurance regarding effectiveness of safeguarding at schools.