

Empower Multi Academy Trust Safeguarding and Child Protection Policy 2023-24

Policy reviewed	August 2023 Interim update to reflect changes to WT 2023	
Date approved by Governing Body/Trustees		
Next review date	August 2024	

Key personnel – Trust level

Role	Name	Contact details
CEO	Carla Whelan	Carla.whelan@empowertrust.co.uk 07980480969
Designated Safeguarding Lead	Carla Whelan	Carla.whelan@empowertrust.co.uk 07980480969
Mental Health Lead	Michelle Harrington	Michelle.harrington@empowertrust.co.uk
Online Safety systems level	Tricia Slater	Tricia.slater@empowertrust.co.uk
Chair of Trustees	Paul Bunting	Paul.bunting@empowertrust.co.uk
Safeguarding Governor/Trustee	Paul Donoghue-WFI Mary Stockton-SGJ	donoghue.p@woodfield.shropshire.sch.uk Stockton.m@st-georgesjun.shropshire.sch.uk

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Key Personnel – school level

Role	Name	Contact details
Headteacher*	Beck Preece-WFI Kelly Lee-SGJ	01743 343812-WFI admin@woodfield.shropshire.sch.uk
Designated Safeguarding Lead (DSL)*/**	Beck Preece-WFI Kelly Lee-SGJ	01743 357133-SGJ admin@st-georges-jun.shropshire.sch.uk
Deputy DSL(s)*/** <i>Insert additional rows if applicable</i>	Olivia Physick-WFI Lucy Smith-WFI Emma Shelbourne-WFI Charlotte Worley-SGJ Clare Smallwood-SGJ Craig Pearce-SGJ Lucy Mulliner-SGJ Rebecca High – SGJ Sarah Bliss – SGJ Jen Hughes - SGJ	
Designated Teacher	Beck Preece-WFI Kelly Lee-SGJ	
Mental Health Lead	Emma Pickard-WFI Abby Jones-SGJ	
Online Safety Co-Ordinator/Lead	Emma Shelbourne-WFI Charlotte Worley-SGJ	
Relationship Sex Health Education Lead	Jen Mantle-WFI Abby Jones-SGJ	
Chair of Governors*	Robin Walker-WFI & SGJ	walker.r2@woodfield.shropshire.sch.uk or walker.r@st-georges-jun.shropshire.sch.uk
Safeguarding Governor/Trustee	Paul Donoghue-WFI Mary Stockton-SGJ	donoghue.p@woodfield.shropshire.sch.uk Stockton.m@st-georgesjun.shropshire.sch.uk

*Out of hours contact details will be made available to staff

**Any changes to key personnel/holiday/emergency contacts will be shared with the appropriate agencies and Safeguarding Partnerships.

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Policy Scope and Aims

This policy applies to anyone working on behalf of Empower Multi Academy Trust including senior managers and the board of trustees/governing body, staff, volunteers, contractors, agency staff and students.

The policy is publicly available on the Trust website and all school websites (or on request from individual schools or Trust administration).

The policy aims to meet the requirements as outlined in Part 2 Keeping Children Safe in Education 2023 (page 27).

Safeguarding Statement

We believe that:

- **All children have the right to protection from all types of abuse.**
- **Everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.**

This means that we will:

- Not tolerate the abuse of children. This includes never accepting and always challenging or raising concerns about words or actions which downplay, justify, or promote abuse. This applies to anyone who is part of, comes into or works with our school.
Be child centred ¹and ensure that we consider the best interests of children in everything that we do. **This includes ensuring that we enable children's voices and experiences to be heard (using communication tools and advocacy if necessary); and that children are involved in and informed about the decisions being made about them.**
- Ensure we provide a safe environment for children to learn, grow and develop and feel able to raise any concerns they may have for themselves or others.
- Look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse or neglect of a child.
- Ensure no child or group of children are treated less favourably by us than others.
- Be aware of and take extra positive actions that may be needed to safeguard and promote the welfare of a child(ren) who we know are more vulnerable to experiencing abuse or discrimination.
- Work in partnership with our children, their parents, carers, and other agencies.

Key Terms

Safeguarding and promoting the welfare of children is defined as:

- **providing help and support to meet the needs of children as soon as problems emerge.**
- **protecting children from maltreatment, whether this is within or outside of the home, including online.**
- **preventing impairment of children's mental and physical health or development,**
- **ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and**
- **promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and**
- **taking action to enable all children to have the best outcomes²:**
 - **Outcome 1: children, young people and families stay together and get the help they need.**
 - **Outcome 2: children and young people are supported by their family network.**
 - **Outcome 3: children and young people are safe in and outside of their homes.**

¹ See [Working Together to Safeguard Children: Chapter 1: A child centred approach](#)

² [Children's social care: national framework - GOV.UK \(www.gov.uk\)](#)

- Outcome 4: children in care and care leavers have stable, loving homes.

Child Protection is a part of safeguarding and promoting welfare. It refers to the specific activity that is undertaken to protect specific children who are **suspected to be** suffering, or are likely to suffer, significant harm. **This includes harm that occurs inside or outside the home, including online.**

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, **including where they see, hear, or experiences its effects.**

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

There are a number of types of abuse and safeguarding issues that could increase the risk that a child could be abused. These are further defined and explained in Part 1, Part 5 and Annex B of Keeping Children Safe in Education 2023.

Staff refers to all those working for or on behalf of the school or Trust, full or part time, temporary or permanent in either a paid or voluntary capacity. The exception to this term is Governors/Trustees.

Governors/Trustees refers to each School's Governing Body & Trustees.

Child includes everyone under the age of 18.

A **Parent** refers to birth parents and others who have parental responsibility (as defined by the Children's Act 1989) or has care of a child.³

Legislation, Standards and Guidance

This policy is based on the following legislation, guidance, standards, and procedures:

Legislation	Statutory National Guidance/Standards	Local Procedures
<ul style="list-style-type: none"> • <u>Education Act 2002 Section 175 (maintained schools only)</u> • <u>Education Act 2002 Section 157 (Independent schools incl Academies and CTC's)</u> • <u>Children Act 2004</u> 	<ul style="list-style-type: none"> • <u>Keeping Children Safe in Education and any legislation or guidance (statutory/nonstatutory) outlined or referenced within it.</u> • <u>Early years foundation stage (EYFS) statutory framework</u> • <u>Working Together to Safeguard Children</u> and any legislation or guidance (statutory or non-statutory) outlined or referenced within it. 	<ul style="list-style-type: none"> • <u>West Midlands Safeguarding Children Procedures</u> • <u>Shropshire Safeguarding Community Partnership (SSCP) Childrens Threshold Document</u> • <u>Shropshire Safeguarding Community Partnership Allegations about staff/volunteers protocol</u> • <u>Shropshire Schools Operation Encompass Protocol</u>

³ S576 Education Act 1996

Linked Policies

<ul style="list-style-type: none">• • Behaviour/Anti-Bullying Policy• • Staff Behaviour Policy / Code of Conduct• • Whistleblowing• • Health & Safety• • Allegations against staff• Attendance• Curriculum-Teaching and LearningRSHEComplaintsSEND	<ul style="list-style-type: none">• • Administration of first aid/medicines• Physical intervention / Positive Handling• Online Safety, including staff use of mobile phones/ devices with imagery and sharing capacity.• • Risk Assessments• • Safer Recruitment• Disciplinary and grievanceIntimate CareRadicalisation and Extremism-Prevent• Data Protection/GDPR Guidance
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Roles and Responsibilities

We follow the statutory guidance as set out in the latest Keeping Children Safe in Education (and associated documents and guidance); adhering to the roles and responsibilities and expectations identified for:

The Trustees, delegated to the Governing Body:

Have a strategic leadership responsibility for ensuring we take a whole trust approach to safeguarding arrangements as outlined in this policy and that we comply with our duties under [Legislation and Guidance](#). Part 2 Keeping Children Safe in Education outlines their key responsibilities.

The Safeguarding Governor is responsible for leading on the governance oversight of safeguarding arrangements in each individual school on behalf of the Trustees; regularly meeting with the Designated Safeguarding Lead *at least termly prior to a governance meeting and* reporting back to the Governing Body through a link governor report.

The Chair of the Governing Body will liaise with the CEO/ Chair of Trustees in the event of an allegation of abuse made against the Headteacher in line with the Trust complaints process.

All Governors/Trustees will ensure:

- The school has a Designated Safeguarding Lead who has the appropriate status and authority to carry out duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- The school has safeguarding policies and procedures in place (as outlined in Part 2 Keeping Children Safe in Education) that are implemented effectively and comply with our duties under [Legislation, Standards and Guidance](#) at all times.
- All staff and governors are knowledgeable and confident in carrying out their safeguarding duties in line with [Professional development and support](#).
- That the effectiveness and implementation of safeguarding arrangements are robustly overseen by the Governing Body by half termly updates in each local governors meeting, a termly link governor review and Chairs feedback to Trustees termly.

The CEO:

Is responsible for the overall effectiveness of safeguarding across the Trust, with delegated individual oversight to Headteachers for ensuring safeguarding arrangements are implemented effectively in school.

The Trust

Ensure that all policies including safeguarding policies and procedures and those required to be in place, are robust so Headteachers can implement and ensure they are followed by all staff.

The Headteacher:

Is responsible (with the lead support of the Designated Safeguarding Lead) for ensuring safeguarding arrangements are implemented effectively in school. This includes:

- Having the overarching responsibility of ensuring the effectiveness of our school safeguarding arrangements as outlined in this policy.
- Being accountable and reporting to the Governing Body (with the support of the Designated Safeguarding Lead) on the effectiveness of school safeguarding arrangements.
- Supporting and promoting a whole school safeguarding culture and ethos as outlined in our [Safeguarding Statement](#). This includes ensuring that the Senior Leadership Team work effectively together and with the Designated Safeguarding Lead, to ensure a whole school approach to safeguarding.
- Take the lead role in [Ensuring Safe Practice](#); including ensuring staff are knowledgeable and confident in their safeguarding practice; **including making sure that their practice is in line with national and local requirements**. The Headteacher is also the lead person responsible for receiving, managing, and referring to/liasing with the Local Authority Designated Officer (with the support of the Designated Safeguarding Lead) or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.
- Enabling the Designated Safeguarding Lead and any deputy(ies) to carry out their roles effectively. This means ensuring they are given sufficient time, training, support, resources, including cover arrangements where necessary.

The Designated Safeguarding Lead (DSL):

Takes the lead responsibility for safeguarding and child protection in each Empower school. Annex C Keeping Children Safe in Education 2023 outlines their key responsibilities. Deputy Designated Safeguarding Lead(s) (hereafter referred to as DDSL) support the Designated Safeguarding Lead in the discharge of their responsibilities.

Responsibilities include:

- Ensuring that the school implements the Trust child protection policy as required by Keeping Children Safe in Education and followed by all staff.
- Being available to deal with safeguarding and child protection during school hours, ensuring cover is available to allow this responsibility to be fulfilled.
- Acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the school filtering and monitoring system) and to our school.
- Supporting the Headteacher to [Ensure Safe Practice](#) in school.
- Managing safeguarding referrals to the Local Authority; Police and any other statutory authorities or multi-agency risk management arrangements (see [Designated Safeguarding Lead Response](#)).
- Working closely with the Governing Body, Headteacher and relevant senior leadership team members to ensure a whole school safeguarding culture and ethos as outlined in our [Safeguarding Statement](#) and the implementation of effective safeguarding arrangements, as outlined in this policy.
- Acting as the point of contact to and proactively engaging with the Shropshire Safeguarding Community Partnership arrangements as outlined in [Working in Partnership](#).
- Ensuring children and parents are aware of how and encouraged to raise safeguarding concerns and how they will be responded to as outlined in [Working in Partnership](#).
- Act as a source of support, advice, and expertise to all staff; including ensuring that there is ongoing promotion and awareness of safeguarding and children protection in school.
- Ensuring the effective management and oversight of safeguarding information as outlined in [Record Keeping and Information Security](#).
- Maintaining and access [Professional development and support](#).

All staff (including students and volunteers):

Are expected to work in line with our [Safeguarding Statement](#) and adhere to the policies, processes and systems that support safeguarding as outlined in this policy. This specifically includes:

- Accessing and maintaining [Professional development and support](#) to ensure they remain knowledgeable and confident in their safeguarding practice.
- Recognise, Respond and Report [Staff Safeguarding Concerns](#)
- Engaging in [Safe Practice](#). This includes raising concerns (however small) about individual behaviour or practices or cultures in schools that compromise the safety of children as outlined in [Ensuring safe staff](#).
- [Teaching our children how to keep safe](#)

Professional development and support

To ensure all our staff and governors are knowledgeable and confident in keeping children safe in our schools; they will complete the professional development activities as outlined below. At Trust level we monitor professional development activities and maintain a central professional development record.

The Designated Safeguarding Lead and any Deputy Designated Safeguarding Lead(s) provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, appraisal, and performance processes in school. Updates are communicated throughout the year via the school Arbor system. The Designated Safeguarding Lead (and deputy(ies)) receive regular support and supervision organised at individual school level.

All Staff (including volunteers)

Activity	Frequency
Receive information on school safeguarding arrangements and procedures as outlined in KCSiE 2023 (Part 1: page 7, paragraph 13).	September of each new academic year Induction or when arrangements/procedures are updated.
Read Keeping Children Safe in Education (KCSiE): <ul style="list-style-type: none"> • All Staff: Part 1; Part 5 and Annex B. • Senior Leadership Team: Entire document • Staff who do not work directly with children: Annex A 	September of each new academic year Induction then annually (in Autumn Term) or when updated.
Complete Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns (<i>We follow the Local Authority Safeguarding in Education Training Statement accessed here</i>) Safeguarding and Child Protection Shropshire Learning Gateway (shropshirelq.net)	Induction and then every 3 years
Complete Prevent Awareness Training appropriate to role (see <i>examples of training packages at: The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</i>)	Induction and every 2 years. Online using Every system
Complete Cyber Security Training (<i>training packages are available at: Cyber security training for school staff - NCSC.GOV.UK</i>)	Induction and then annually
Receive regular national and local safeguarding updates (including those relating to online safety).	NSPCC CASPAR weekly updates and any other relevant Safeguarding newsletters and information. Sent via Arbor system

Designated Safeguarding Leads (including any deputies)

Activity (in addition to all staff above)	Frequency
Complete Schools Designated Safeguarding Lead Training to a standard as outlined in KCSiE Annex C	On induction in role and then every 2 years
Read Keeping Children Safe in Education in its entirety.	Induction into role then annually (in Autumn Term) or when updated.
Maintain knowledge and development relating to the role of DSL (including Early Help/Brook Traffic Light Tool as essential)	As required, but at least annually

All Governors

Activity	Frequency
Complete Governor Safeguarding Training to equip them with the knowledge to carry out their strategic Roles and Responsibilities .	Induction and then every 3 years.
Read Keeping Children Safe in Education • All Governors: Part 1; Part 2 and Annex B. • Chair & Safeguarding Link Governors: Entire document	Induction into role then annually (in Autumn Term) or when updated).
Complete Cyber Security Training (<i>training packages are available at: Cyber security training for school staff - NCSC.GOV.UK</i>)	Induction and then annually
Complete Prevent Awareness Training appropriate to role (see examples of training packages at: The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk))	Induction and every 2 years.

Staff/Governors involved in recruitment of staff (including administration)

Activity (in addition to other relevant above)	Frequency
Read Part 3: Keeping Children Safe in Education	Induction into role then annually (in Autumn Term) or when updated.
Complete appropriate safer recruitment training (that is in alignment with Part 3 KCSiE)	Induction and every 3 years (or when KCSiE Part 3 is updated)

Ensuring Safe Practice

Safer recruitment

We adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in our setting. All staff/governors involved in recruitment complete additional safer recruitment training as outlined in [Professional development and support](#). Our recruitment procedures are outlined in: *Safer Recruitment; Volunteer Policies* and are in alignment with Keeping Children Safe in Education 2023: Part 3.

As part of our recruitment and selection processes; we ensure that our commitment to safeguarding and promoting the welfare of children is evident to candidates throughout each stage of the process; with any candidate who is not suitable to work with children being deterred and identified at the earliest point. This policy is included in the application information for candidates. We also ensure that all applicants complete a robust application form. We seek suitable references and carry out online social media checks prior to interview; as well as ensure that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

In accordance with Keeping Children Safe in Education 2023: Part 3; we maintain a record of information we have received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and students); Governors/Trustees; [contractors](#); and [visitors](#) who attend our school in a professional capacity. We complete the checks on staff, volunteers, and Governors/Trustees who we recruit ourselves. For those who are recruited by others; we ensure that we receive written confirmation of the relevant checks completed and check their identification before they are allowed to work unsupervised or engage in regulated activity with children.

Where we do not have all the necessary information or there are gaps in the information; we have robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks or suitability are allowed to work unsupervised or engage in regulated activity with children. We reserve the right to refuse access to the school site any person who we are not assured is safe to work or engage in regulated activity with children.

On appointment, staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of school.

If any safeguarding concerns of allegations arise relating to a member of staff, Governor/Trustee or other person working on our school premises; staff are expected to act in line with [Ensuring safe staff](#) and [Staff Safeguarding Concerns: Recognise, Respond, Report](#).

Visitors

We have procedures for recording the details and confirming the identity of visitors, including prospective candidates. We ensure that we have control over who comes into the premises so that no unauthorised person has unsupervised access to children.

Visitors to the school site must sign in using the Inentry sign in system, read the policy and secure their mobile phone in the lockers provided (unless agreed otherwise) before coming into school.

Use of school premises for non-school activities

When we have arranged a extra-curricular activities out of school hours which is are direct supervision or management by school staff, this safeguarding policy is to be followed and any concerns should be managed in accordance with [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Response](#).

We will follow our [Ensuring safe staff](#) procedures if we become aware of any allegations relating to an organisation or individual using our school premises.

Where we have sessions or activities which are provided by another person or organisation that is using the school site and not during school time or under direct supervision, we seek assurances that they have the required child safeguarding arrangements in place as an individual/organisation as outlined in [Keeping children safe during community activities](#). This is regardless of whether children who are on roll at our school access the activity or not.

The arrangements for this will be set out within any transfer of control agreement, (i.e., lease or hire agreement); and failure to comply with these arrangements will lead to termination of the agreement.

Alternative provision

Where we place a child with an alternative provision provider, we continue to be responsible for their safety and welfare and should be satisfied that the provider can meet the needs of the pupil.

Reassurances on risk assessments and the AP checklist will be sought from each provider.

We obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been conducted on individuals working at the establishment, i.e., those checks that the school would otherwise perform in respect of its own staff. See [Appendix A: Alternative Provision Quality Assurance Checklist](#).

Ensuring safe staff

Managing allegations (including low level concerns)

We promote an open and transparent culture in which all concerns about the behaviour or conduct of any adults working in, at or on behalf the school are dealt with appropriately.

There are two levels of allegations / concerns:

1. Allegations that may meet the harm threshold.

Circumstances where a someone working within the school has or may have:

- behaved in a way that have harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes any behaviour that may have occurred outside of the school that could pose a transferable risk.

Allegations that someone that is working in, at or on behalf the school has met the harm threshold should be immediately referred to the Headteacher in person. Staff may be required to provide a written statement at the request of the Headteacher.

If the allegation relates to the Headteacher; this should be immediately verbally reported to the Chair of Governors/Proprietors/Management Committee.

If there is any conflict of interest or immediate risk of harm to a child or; then the person with the concern must ensure [Immediate safety](#) and contact the Local Authority Designated Officer in accordance with [Shropshire Safeguarding Community Partnership Managing Allegations Procedures](#).

In most cases; the Headteacher (or the Chair of Governors if applicable) will lead on managing allegations; with the support of the Trust HR and the Designated Safeguarding Lead. They will ensure that Part 4 Keeping Children Safe in Education 2023 and [Shropshire Safeguarding Community Partnership Managing Allegations Procedures](#) are applied. Any allegations that meet the above criteria will be referred to the Local Authority Designated Officer within 1 working day and we will follow their advice and guidance.

Where an allegation is made in a nursery, we will notify OFSTED as soon as reasonably practical and within 14 days of the allegation first being made, informing them of action taken by completing the online form - [Report-a-serious-childcare-incident](#) .

It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fairly and consistent way to effectively safeguard all those involved.

We also have a duty of care towards our staff, and we will provide a named contact for the staff member.

If necessary, we will adhere to our legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Part 3 Keeping Children Safe in Education if the criteria for such reporting is met.

2. Allegations / concerns that do not meet the harms threshold (Low level concerns).

The term low level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteer may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Our staff code of conduct outlines examples of what could be considered a low-level concern.
- Does not meet the harm threshold at point 1 above.

Low level concerns should be reported in person to the DSL; to embed our culture of openness and transparency. To ensure that our schools and Trust values and expected behaviours are lived, monitored, and reinforced by all staff.

The Headteacher will decide the outcome of all low-level concerns (in consultation with the Designated Safeguarding Lead if necessary) raised in line with staff code of conduct and disciplinary policy. Consideration will be given to whether there is a pattern of behaviour by the individual; or if there is a wider school culture issue and if policies need to be revised, or if all staff guidance or additional staff training is required.

Whistle Blowing

Whistleblowing is the mechanism by which staff can raise concerns in good faith without fear of repercussions. All staff have a duty to raise concerns where they exist about another staff or volunteers practice. This may include attitude or actions of colleague's poor or unsafe practice or potential failures in adhering to the schools' policies, procedures, and staff code of conduct.

If staff have such concerns; these should be raised to *DSL or Headteacher refer to whistleblowing policy and procedure for your school.*

If staff feel unable to raise concerns with the school directly; they can contact [NSPCC Whistleblowing Advice Line](#).

Record Keeping and Information Security

We have a legal duty to act in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). We have data protection processes in place to ensure that we keep and process (manage) personal information about children, their families, staff and others safely and lawfully. This includes:

- Securely manage electronically held information in line with [Meeting digital and technology standards in schools and colleges](#) and [Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK](#) (see also [Online Safety](#))
- Manage requests for access to personal information we hold (known as subject access requests).

Details of our processes and how to request access to personal information we hold are outlined in [\(Empower Trust GDPR and Data Protection Policy](#) See [Statutory policies for schools and academy trusts: Administration and Data](#))/ [Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK](#))

Storage and management of safeguarding information (child protection files)

Safeguarding [concerns](#) and [responses](#) for individual children are kept on our CPOMs (Child Protection Online Monitoring) system which is secure with restricted access. Where there is a paper Child Protection file, these are stored securely for each child and are separate to a child's main pupil file. The Designated Safeguarding Lead is responsible for ensuring the quality, maintenance, and management of child protection files; as well as using the system to monitor themes and patterns of concern to inform and continue to improve the whole school approach to safeguarding.

Sharing safeguarding information with others

We are proactive in sharing information with each other and others who are working with our children and their families as early as possible; so that children can receive the help and support they need; respond to any safeguarding concerns and where possible prevent abuse.

Staff are expected to share information with one another as part of their work in school about the needs and risks of children on a need-to know basis in line with our [Safeguarding Statement](#) so that we keep children safe and promote their welfare. They are not permitted to share information with friends, family, or anyone in the local community outside of their work.

Sharing information with other organisations

Staff should be familiar with and use [Information sharing advice for safeguarding practitioners](#).

As part of our [work in partnership](#) with parents and children; consent to share their information with others outside of school should always be sought from a child and their parent(s) unless it is not safe to do so. This includes where seeking consent would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If a parent or child does not consent to information being shared, the law does not prevent the sharing of information if sharing is necessary for the purpose of keeping a child safe and promoting their welfare. Therefore, staff must make parents and children aware that information may still be shared with other organisations if necessary to help keep their child safe or promote their welfare or if there is another legal basis to do so.

Decisions to share safeguarding information with other organisations will be overseen by the Designated Safeguarding Lead (please also refer to [Designated Safeguarding Lead Response](#)).

Transfer of child protection files and other safeguarding information

When a child leaves for a new education setting; the Designated Safeguarding Lead will arrange for the child protection file (and any additional information to help the new setting to help safeguard and promote the child's welfare) to be transferred to the new setting no later than within 5 working days of an in-term transfer or within 5 days from the start of the new term. Where the move is planned, the Designated Safeguarding Lead will consider sharing information in advance of the child leaving to help with the child's transition and to enable any help and support they may need. This is shared separately to any child's main file and confirmation of receipt of the files should be gained. [Appendix C: File Transfer Record and Receipt](#)

If a child is absent from education or Electively Home Educated; we share relevant information with the Local Authority as required by law (please also see [Children potentially at greater risk of harm](#)). If the child leaves our setting and does not move to a new education setting; we transfer their child protection file (and any additional information as necessary) to the relevant Local Authority that they reside in line with the local protocol.

Working in Partnership

As is outlined in our [Safeguarding Statement](#); and in order to ensure all children in our school are effectively safeguarded and their welfare is promoted; we will work in partnership with our children, their parents and other agencies/partnerships as follows:

Children

Our children are [taught how to keep safe](#); including how and when to share or report to us any worries or concerns they may have about their safety and wellbeing or that of others. We encourage children to share, and report worries and concerns by:

- Speaking to a trusted adult
- Speaking in the safety of circle times / PSHE sessions
- Worry Boxes

Staff are expected to build trusted relationships with and work in the best interests of children in line with our [Safeguarding Statement](#); and recognise, respond and report [Staff Safeguarding Concerns](#).

Each school, alongside Trust mechanisms, actively seek children's views of safety in school through surveys and dialogue. This is reported back at many levels to ensure it is heard and impacts practice. We actively seek children's views of safety in school through pupil questionnaires and assemblies.

Parents

We recognise the importance of working together with and supporting parents to safeguard and promote the welfare of their children. This includes:

- Communicating to parents how we keep children safe in our schools/Trust (including online). This policy is made available to all parents on all websites. If parents want to raise concerns or complaints about how we keep their children safe; they can do this using our Complaints Policy which is available on our website. We also actively seek parent views of safety in school *in regular surveys*.
- Encouraging parents to share and report worries and concerns about the safety and welfare of their child(ren) or any other children. We do this by encouraging parents to approach us either face to face or via the admin team offices with any concerns that they may have. Staff are expected to respond to

any parents who raises worries or concerns to them either about their child(ren) or others in line with [Staff Safeguarding Concerns: Recognise, Respond, Report](#) .

- The Designated Safeguarding Lead will ensure that we work with parents to offer and enable support for children and their families; taking action to safeguard and promote their welfare (see [Designated Safeguarding Lead Response](#)) in line with the local arrangements in the area that they live.
- Ensuring that parents are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority and/or Enforcement Agencies. We do this by communicating the process online and signposting through letters and newsletters.
- Providing parents with regular information, guidance, and external support available to them by signposting them to our website and through meetings with class teachers and SENCo.

Other agencies/partnerships

As we operate in Shropshire; we engage and co-operate with our local safeguarding arrangements. Our local safeguarding partnership is the [Shropshire Safeguarding Community Partnership \(SSCP\). We engage and co-operate by:](#)

- Ensuring we effectively safeguard and promote the welfare of children living in Shropshire in line with [Working together to safeguard children](#) and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the [SSCP Threshold Document](#). Where children do not live in Shropshire but attend our school; we will work in line with the relevant local arrangements in their home area.
- Ensuring we work with other agencies and comply with other pieces of relevant statutory guidance in safeguarding [Children potentially at greater risk of harm](#).
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.
- Working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure we are providing high quality education and support to children in Shropshire.
- Participating in the local [Operation Encompass Protocol](#); an arrangement where police notify schools when a child who attends their school may have been subject or witness to police-attended incidents of domestic abuse. This enables us to provide appropriate emotional or practical support to a child/ren who may have been witness to and victim of domestic abuse. All new parents/carers are sent a letter informing them of our participation in Operation Encompass).

Teaching our children how to keep safe.

We recognise that educating our children in how to keep themselves and others safe both online and in face to-face situation plays a crucial role in safeguarding them. We have a clear set of values and standards the provide opportunities for children to learn how to keep themselves and others safe; that are demonstrated and reinforced throughout school life and underpinned through -

- [Safeguarding Statement](#)
- Behaviour/Anti-Bullying Policy (Insert link)
- [Preventing Radicalisation](#)
- Our approach to [Online Safety](#)
- Our Personal Social Health and Education and Computing curriculum and policies including our RHE /RSHE Policy. Our RSHE programme is developed to be fully inclusive of all ages and stages of development and consideration of children's needs including [Children potentially at greater risk of harm](#); and addresses issues as outlined Keeping Children Safe in Education 2023; Part 2, page 34, paragraph 131.

The DSL & Senior Leadership Teams, as well as some subject leads (such as computing, Mental Health and SENDCo) will work collaboratively to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in school.

Online Safety

The use of information and communication technology (ICT); is a vital part of the everyday functioning of and life in school. We also recognise the important role ICT plays in the lives of our children and their families.

Whilst there are many benefits and strengths in using ICT; there are also a number of risks to children's welfare and safety in school when using internet enabled technology; which are summarised in the following categories⁴:

- **content:** being exposed to illegal, inappropriate, or harmful content.
- **contact:** being subjected to harmful online interaction with other users.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm to children or others.
- **commerce:** - illegal, inappropriate, or harmful online commercial activities that can compromise the health and wellbeing or security of children or others.

We adopt a whole school approach to online safety which aims to safeguard and educate our children and their families, staff, visitors and our school in our use and management of ICT (including the use of camera enabled; mobile and personal devices and the ICT systems we have in place). Our online safety policy outlines our approach, which is available on the school websites.

Where there are online safety concerns involving identified children (including child-on-child abuse); we will follow [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Safeguarding Response](#).

Any school cyber security incidents will be reported to [Action Fraud \(National Fraud and Cyber Crime Reporting Centre\)](#) and, if there is a data breach this will be reported in line with our Data Protection Processes to the [Information Commissioners Office](#). Please also see [Record Keeping and Information Security](#).

Where children are being asked to learn online at home, we follow advice from the Department of Education; [Safeguarding and remote education](#). Our approach to remote learning is outlined in our Remote Learning Policy.

We review our online safety arrangements annually to ensure that we meet the Keeping Children Safe in Education 2023 and [Safeguarding children and protecting professionals in early years settings: online safety considerations](#) online safety standards (including the digital standards for [filtering and monitoring](#) and [cyber security](#)). Any risks arising from our reviews are clearly recorded as part of our school evaluation and improvement action planning processes. These are reported to and overseen by our Governing Body.

All Staff, senior leaders and Governors are appropriately trained (see [Professional Development and Supervision](#)) to enable them to ensure effective online safety arrangements. We will respond to online safety incidents which indicate safeguarding concerns in line with the [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Response](#) sections of this policy.

Preventing Radicalisation

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015; places a duty on schools and registered childcare providers to have due regard to the need to prevent people from being drawn into terrorism.

We have a Preventing Terrorism policy in place available on the school websites, which outlines how we fulfil this duty.

We fulfil our duty by:

⁴ Examples of what could be included in the categories is further detailed in Keeping Children Safe in Education 2023 (Part 2; page 35-36)

- Promoting fundamental British Values as part of our values and curriculum (refer to relevant policies).
- Ensure that we provide a “safe space” for children to understand and discuss sensitive topics, those linked to terrorism and extremism, and learn (according to their age and level of development) how to question and challenge these ideas in a politically balanced way.
- Be alert to and identify children who may be susceptible to extremist ideology and where it is assessed as appropriate by the Designated Safeguarding Lead; make a Prevent referral (in line with the local Preventing Terrorism Processes)
- Monitor and report any hate based behaviour as part of our Behaviour and Child-on-Child Abuse Policies (Hate related incident reporting processes can be found [here](#)).
- Outline in our Online Safety and Relationship Sex Health Education Policies (include any other curriculum subjects related policies) how children are being safeguarded from being drawn into terrorism (including visiting speakers) (please also refer to Teaching our children how to keep safe.)
- Assess the risk of our children being drawn into terrorism, ensuring this is informed by the potential risk in the local area. Any identified risks are referenced in our school evaluation processes; and inform our approach to online safety (including filtering and monitoring and cyber security arrangements).

We regularly review our adherence to the Prevent Duty. Any actions arising from our assessment are included in our school evaluation and improvement action planning processes. These are reported to and overseen by our Governing Body.

All Staff, senior leaders and Governors are appropriately trained (see [Professional Development and Supervision](#)) to enable them to ensure that all children, particularly those who may be susceptible to extremist ideology and radicalisation are effectively safeguarded. We respond to children who are identified as being susceptible to an extremist ideology in line with the [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Response](#) sections of this policy.

Children potentially at greater risk of harm

We recognise that whilst all children should be protected, some groups of children, are potentially at risk of greater harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups. Where a child falls into multiple groups above; this potentially further increases their vulnerability.

Children who need a social worker (Child in Need and Child Protection Plans).

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or complex family circumstances. A child’s experiences of adversity and/or trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

School will attend regular meetings that are held as part of the CIN or CP process, these may be online or face to face. Where they are face to face, school will encourage the meetings to take place at school. School will work proactively with all agencies involved.

Looked After Children and previously looked after children.

The most common reason for children becoming looked after is as a result of abuse and/or neglect; as well as/or other significant complexities or adversity in their and their family’s life.

At each school, we ensure that appropriate staff members have access to the information they need in relation to a child’s looked after legal status, contact and care arrangements. School has an appointed designated teacher who works with the local authority to promote the educational achievement of registered pupils who are looked after in line with [Statutory guidance - Designated teacher for looked-after and previously looked after children](#)

Children who are absent from or are not in receipt of full-time education

All children aged 5-16 are legally entitled to a full-time education, suitable to any special education need. Education is essential for children's progress, wellbeing and wider development and being in school is a protective factor against wider harms, including exploitation.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect or child exploitation, as well as other needs. Our response to persistently absent pupils and children who are absent from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

School has a robust attendance policy in place, outlining processes and procedures, and work closely in partnership with the Education Welfare Officer. The attendance policy is available on the school websites. Good attendance is encouraged through newsletters and weekly letters and positive partnerships with parents.

We refer to and use Statutory Guidance on [Children missing education](#) to ensure we comply with our duties regarding children missing education. This includes notifying the Local Authority in line with the [Shropshire Council Children missing education](#) process when removing a child from the school roll at standard and nonstandard transition points.

We have policies in place; that are in line with associated statutory guidance and [Shropshire Council Education Access Service Local Processes](#) including:

- Attendance Policy (*ensure this is in line with [Working together to improve school attendance and Shropshire Council Education Access: Attendance and Children missing education](#) process when removing a child from the school roll at standard and non-standard transition points*).
- Children with health needs who cannot attend school (*ensure this is in line with [Education for children with health needs who cannot attend school](#)*)

Children who are Electively Home Educated.

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

School operates in line with [DfE Elective home education guidance](#) and Shropshire Council [Elective home education](#) processes and protocols.

When a parent expresses their intention to remove their child from school with a view to educating them at home, school will contact the EWO and arrange a meeting with the parent to ensure that they have considered all options and are aware of the issues. This is particularly important where a child has special educational needs or disability, and/or has a social worker and/or is otherwise vulnerable.

If a family are discussing EHE or have stated they would like to be EHE, professionals should:

- Try to establish the reasons why this decision has/is being made through arranging a meeting with the parents.
- Look at what else can be done to support this pupil:
- IAF referral
- PPM meeting
- Fast Track Meeting
- Managed move
- PLP implemented.
- Flexi-schooling arrangement
- Inclusion service support

- EWO support
- GSP or EHCNA exploration
- Early Help Referral/ Whole Family Assessment
- Meeting with key professionals and family to create a plan to address any issues or concerns.
- Ensure the family understand that they are FULLY responsible for providing their child with an education that is full time and suitable to their child's age and ability and that progress should be demonstrated. No work or resources are provided. If they cannot do this, the EHE team will assess education as unsatisfactory, and the child will be referred to the CME team. They will then require the child to attend school or court action will be taken.
- There is no financial support available.
- Parents must find an exam centre that accepts private candidates (if you are a school this is something you may be able to offer with the parent paying any fees).
- Parents are responsible for paying for any examinations.
- If a parent is using EHE to avoid non-attendance procedures, they may still be prosecuted/fined as the offence has already been committed. EHE should therefore NOT be used to avoid school attendance issues.

If a parent still wishes to remove their child for EHE, a letter confirming their decision will be sent to them and the Local Authority are notified that the child will be taken off roll.

Children who have experienced multiple suspensions and are at risk or, or have been permanently excluded

It is important that children in our school know and understand how we expect them to behave, and we ensure that our school is a safe place where all children feel safe and are able to learn. Serious, harmful and/or repeated behaviour by children will always be responded to. Such behaviour can be a sign or indicator that a child has an unmet need or could indicate that they are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience⁵ in their life.

Our Behaviour Policy outlines the expected standards of behaviour for our children; as well as how the school will support and respond to children with additional needs (including Special Educational Needs and Disabilities), or whose needs or circumstances might affect their behaviour. Where a child's behaviour also indicates a safeguarding concern; staff will adhere to [Staff Safeguarding Concerns: Recognise, Respond, Report](#).

Children requiring Mental Health Support

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. Children who have mental health needs will often need early help or support to avoid their safety and welfare being compromised.

We have senior mental health leads at both schools who is a member of/ supported by the senior leadership team. They work in partnership with the staff to ensure up to date knowledge and understanding of needs. Parents are signposted to support services via the school's website and referrals are made in a timely way.

[Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK \(www.gov.uk\)](#)

Children with Special Education Needs Disabilities or other health issues.

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

⁵ See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

We recognise that additional barriers can exist when recognising abuse and neglect in this group of children (e.g., assumptions that indicators of possible abuse such as behaviour, mood, and injury, relate to the child's impairment without further exploration).

The SEN code of practice is adhered to for all children with SEN. Any additional pastoral support needed is provided in the same way as it is for all children.

[SEND code of practice / The SEND local offer | Shropshire Council / Education for children with health needs who cannot attend school -.](#)

Schools also ensure ***this links with arrangements relating to children absent from education above.***

Children who are lesbian, gay, bi or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

The PSHE curriculum celebrates individual differences and bullying is highlighted through anti-bullying weeks in school. Any behaviour of bullying is dealt with swiftly, in line with the anti-bullying policy.

[Equality Act 2010: advice for schools.](#)

Child-on-Child Abuse

As set out in our [Safeguarding Statement](#); we will not tolerate the abuse of children. This includes where children abuse other children (child-on-child abuse) or use words or actions which downplay or could (if not responded to) lead to abuse.

We want to ensure that no child-on-child abuse takes place in our school. However, we understand that we cannot just rely on children telling us that they are experiencing abuse from other children. Staff should understand that even if there are no reports in school, this does not mean child-on-child abuse is not happening. Staff will be made aware of the signs and indicators of child-on-child abuse as part of their [Professional Development and Supervision](#); which do not just rely upon children telling someone. Staff are expected to follow our [Appendix B: Child-on-Child Abuse Procedures](#)

The school monitors patterns of child-on-child incidents including those involving abuse, to ensure that we are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps us to continue to prevent, identify and respond to child-on-child abuse as outlined at the beginning of this section. This monitoring and our responses to it are reported to and overseen by our Governing Body.

Staff Safeguarding Concerns: Recognise, Respond, Report

Recognise

Be alert and curious!

Pay attention to possible **signs or indicators** of abuse from the child or others either from your own observation or what the child/others tell you:

Appearance

Behaviour

Communication.

Do not just rely on a child telling you (there are lots of reasons why they won't)

Any child in any family could become a victim of [abuse](#). Abuse and safeguarding issues are complex; and can often involve a child experiencing multiple issues or types of abuse.

Staff should always maintain the attitude that abuse “could happen here”. Staff should be particularly alert to [Children potentially at greater risk of harm](#) and vigilant in identifying the signs and indicators which could indicate a concern that a child is being or could be at risk of abuse.

As well as maintaining their [Professional development and accessing support](#); staff can remind themselves of the signs and indicators of abuse and safeguarding issues by referring to: [Keeping Children Safe in Education 2023](#): Part 1 and Annex B. and [SSCP - Contacts and Definitions](#).

Signs and indicators of concern may be evident in spaces and places where children spend time (including when online). They may be present in the child or others around them (including adults or children); in their:

- Appearance
- Behaviour
- Communication

Signs and indicators can be recognised by staff through:

Concerns shared directly by a child: Staff *must not rely* on children telling them they are experiencing abuse. Children may not recognise; feel ready; know how to or be able to communicate concerns or worries. Staff must therefore act in accordance with our [Safeguarding Statement](#); [work in partnership](#) and use [professional curiosity](#) and skills in developing trusted and supportive relationships in their everyday work with children.

Observations: In person or online (including online behaviour in school) of a child or someone else (for example a parent, someone working or visiting the school).

Concerns shared by others: either verbally or in written communications. This could be parents; other children; other staff members or other adults who may be working in or with the school or individual children.

Other systems we have in place: For example, online filtering and monitoring or information from other agencies through [working in partnership](#) etc.

There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the child is at risk of or experiencing abuse. Signs and indicators could be present for a variety of reasons as well as abuse (for example other family circumstances; health or learning needs); and may act as an early sign for the need for early help and support. In such circumstances, staff are still expected to respond in line with this policy.

Respond

Ensure the immediate safety of the child potentially at risk. If there is **immediate danger**; take action as necessary to protect the child, others and yourself (including contacting emergency services on 999 and [refer child protection concerns](#))

Apply other relevant policies/procedures (e.g. behaviour; first aid; attendance, staff code of conduct and/or [Appendix B: Child-on-Child Abuse Procedures](#) as applicable).

Seek views/gather relevant information (if safe to do so).

Remember: Listen (don't investigate), reassure (don't promise) and explain you will be reporting the concerns.

Immediate safety

If a child is in **immediate danger**; staff must take individual action as necessary to keep the child, others, and themselves safe. They must:

- Contact emergency services if someone is in immediate danger (999).
- If necessary; refer child protection concerns themselves (follow [Multi-agency Referral: Reporting concerns \(MARF\)](#))
- Work in line with our Behaviour Policy and [Use of reasonable force in schools](#) guidance.
- Report any allegations of harm by adults in a position of trust or unsafe practices in school in line with the [Ensuring safe staff. Other relevant policies/processes](#)

Staff may need to follow other school safeguarding policies/processes (see [Linked Policies](#)) as applicable along with responding in line with this policy. All staff will immediately consider how best to support and protect the child and any other children who may be at risk or involved; ensuring they act in their best interests. Where there are concerns of child-on-child abuse; [Appendix B: Child-on-Child Abuse Procedures](#) should be referred to.

Injuries

We request parents notify us of any accidents or injuries to their child before attending school. We will make a written record of the notification along with any injuries the child may have. Should a child receive any injuries during school time; staff will follow our accident reporting and first aid procedures.

We use body maps to record information about physical injuries to a child as part of our accident/behaviour/first aid safeguarding concern reporting processes.

Seek views and gather information from the child and others.

Where safeguarding concerns are identified; staff should (where it is safe to do so) always seek the views of and directly from:

- Children (where appropriate and depending on the circumstances and their role with children);
- any other people involved in school (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding: see [Record Keeping and Information Security](#))
- Their parents (if necessary and depending on the circumstances and their role).

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead.

Seeking views from the child/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to [When concerns are directly shared by a child](#).

Views should always be sought unless it is not safe to do so. This includes where seeking views would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If needs for help and support are identified; parents and children should always be asked for their consent to share information with other organisations so that help and support can be provided to them. If consent is not given; staff should follow guidance in the [Recording Keeping and Information Security: Sharing safeguarding information with others](#) section.

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead. Decisions to share safeguarding concerns with other organisations without consent will be [reported to](#) and overseen by the Designated Safeguarding Lead.

If a child is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the child may be expressing their views and feelings through

their behaviour and use communication tools to help the child share their views. *Schools will utilise interpreters; Emotional Literacy Support Assistants; Makaton/BSL, Lego/Play etc as and when necessary.*

When concerns are directly shared by a child

Children are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.

When children share the details of or feelings about abuse; the process of sharing can sometimes take time. Children may not share in full or give staff (and sometimes not the same staff member) pieces of information over time. When they do share, this may not always be verbally or directly; but the child may share in the Appearance, Behaviour or other forms of communication (see [Recognise](#) section).

It takes a lot of courage for a child to share that they feel unsafe or are experiencing abuse. There are many reasons why children do not share their experiences (for example, uncertainty, shame, experiences of discrimination, fear, denial or a lack of understanding or ability to recognise and explain their experience).

When children are sharing their concerns; staff should:

- **Listen to the child.** Please refer to this [NSPCC poster](#).
- **Remain calm:** the child may stop sharing if they feel the staff member is upset or shocked by what the child is telling them.
- **Explain it can't be a secret.** Staff must explain to the child that what they share has to be passed on and to who so that you can help them. Think about when to do this to make sure the child feels safe and can continue to trust you and other staff.
- **Reassure** and offer comfort to the child (physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the child is telling you or reprimand them if they decide not to share or for not telling you before.
- **Seek the child's views:** use questions or communication tools that help the child to share from their own point of view. Gather information: do not investigate or assume what is happening to the child.
- **Explain** what will happen next. If you don't know everything that is going to be done, tell the child that you will make sure that they are kept informed.
- **Report and record** the conversation immediately as outlined in the [Reporting concerns](#) section.
- **Seek support** if you feel distressed *through individual school procedures*.

Report

Report in person to the Designated Safeguarding Lead as soon as possible.
Record your concerns, decisions, actions and outcomes on the safeguarding recording system.
If concerned about a member of staff or someone else in the school; report in line with [Ensuring safe staff](#).

Report to Designated Safeguarding Lead

All safeguarding concerns must be Reported to the Designated Safeguarding Lead [as soon as they are recognised and after the initial response to the child and others](#). Staff are expected to verbally report their concerns to the Designated Safeguarding Lead.

Where concerns involve an allegation of harm or a low-level concern about someone working in or at the school; staff must follow [Ensuring safe staff](#).

Record concerns

All safeguarding concerns must be recorded by the staff member in writing. Teachers will do this directly onto CPOMs, support staff will use the recording sheet-see appendix D. Where physical injuries to a child form part of the evidence of the concern; staff will record information about the physical injuries observed on a Body Map: [Child Protection Body Map in the West midlands Physical Abuse Procedures](#).

Each safeguarding concern record should include:

- **a clear and comprehensive summary of the concern.**
- **details of how the concern was followed up and resolved.**
- **any action taken, decisions reached and the outcome.**

If staff are unsure of the recording requirements staff should seek advice from the Designated Safeguarding Lead.

Designated Safeguarding Lead Response

Safeguarding concerns can be [raised by staff](#) as above; but may also be raised to the Designated Safeguarding Lead by:

- Children, parents, or visitors to the school.
- Other agencies (see [Working in Partnership](#))
- The school's ICT filtering and monitoring systems.

The Designated Safeguarding Lead will:

Consider and assess the concern.

Review the information reported; gather any further information as necessary; including conducting a risk and needs assessment if necessary. The Designated Safeguarding Lead will use and refer to the following:

- [Working Together to Safeguard Children 2023](#) (particularly Chapters 1 and 3)
- [Keeping Children Safe in Education 2023](#)
- [SSCP Threshold Document](#)
- [Other relevant local tools and pathways \(West Midlands Procedures\)](#)
- If applicable [Appendix B: Child-on-Child Abuse Procedures](#)
- [When to Call the Police Guidance for Schools](#)

Decide on what action to take.

Once the concern has been considered and assessed; the Designated Safeguarding Lead will decide on action(s) to be taken. They may wish to delegate actions to other members of staff, in the best interests of the child. The DSL will assist the Headteacher with decisions to [Ensuring safe staff](#) in school.

In making decisions, the Designated Safeguarding Lead will work in partnership with the Headteacher; relevant staff/senior leadership team in line with their [Roles and Responsibilities](#) and any other organisations as appropriate (see [Working in Partnership](#) and [Record Keeping and Information Security](#)).

Actions could include one or more of the below:

Manage internally: in alignment with school policies and processes including offering support to the child and their family through the school pastoral support (Universal/School Early Help) offer in a way which addresses the needs/risks identified. This may also include actions to make locations/infrastructure in school (including online) safer; adapt the curriculum to ensure we are [Teaching our children how to keep safe.](#) ; or [Working in Partnership](#) .

- **Offer Early Help/Targeted Early Help.** This could include offering and/or referring the child or their family enhanced or specialist support services to address the needs/risks identified in line with the [SSCP Thresholds document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children's wishes and feelings.

- **Raise concerns to Children’s Social Care** in line with the [SSCP Thresholds document](#) and [relevant local tools and pathways](#).
- **Report to the Police.** If there are any concerns that a crime (including online) may have been committed by someone against or involving a child; concerns will be reported to the Police.

Where there is possible criminal behaviour by a child (including in circumstances of child-on-child abuse); we will take account of [When to call the police: guidance for schools and colleges](#).

Other local referral processes will also be followed as applicable: including referring to relevant multiagency forums and processes as outlined in [relevant local tools and pathways](#) (e.g. to [Prevent Radicalisation](#); ensure [Online Safety](#); respond to domestic abuse: [Multi-Agency Risk Assessment Conference](#)).

Record actions, decisions, and outcomes.

On the child protection file and in line with [Record Keeping and Information Security](#) . This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others (see [Working in Partnership](#)).

Manage and oversee any ongoing response.

Once the initial actions are taken; the Designated Safeguarding Lead will decide whether there is an ongoing need to actively monitor or manage the safeguarding needs of a child. Where this is decided; they will ensure that the school [works in partnership](#) with the child; parents, and any other involved agencies. This may include taking further actions (as outlined above) where concerns escalate.

The [SSCP Escalation/Resolution of Professional Disagreements Policy](#) will be used to challenge, resolve and if necessary escalate any concerns the school may have when working with other agencies in safeguarding children.

Appendix A: Alternative Provision Quality Assurance Checklist



Alternative Provision Quality Assurance Checklist

Name of alternative provision:

Name of person completing checklist (from host school):

All agencies and settings who place pupils at alternative provision MUST quality assure the placement.
This quality assurance document must be completed prior to working with a new alternative provision and **annually** thereafter.

		On file/ eviden ce of check	Date & Initial
1	If this quality assurance check is a review, please confirm the date of previous assurance check.		
2	Is the alternative provision registered as an independent school with the DfE? Y/N The criteria to be registered as an independent school is that; - full-time ¹ education is provided for five or more pupils of compulsory school age Or -full-time education is provided for one or more pupils with an EHC plan or who is “looked after” by a local authority 1 - There is no legal definition of what constitutes ‘full-time’ education. However, DfE would consider an institution to be providing full-time education if it is intended to provide, or does provide, all, or substantially all, of a child’s education.		
3	What is the provider’s DfE number? (If applicable)		
4	Copy of signed Service Level Agreement (SLA) /contract (attached)		
5	Is there a clear governance structure within the Alternative provision? Y/N		
6	Does the referral process include the requirement for a detailed pupil profile from the host school prior to agreement of placement? Y/N		
7	Pupil’s attendance should be monitored daily. Is this included in the SLA? Y/N Copy of providers Attendance policy attached.		

8	Is there a procedure for when pupils fail to attend, or the placement breaks down? Y/N		
9	Is there adequate access to resources for all pupils who access the provision? Y/N		
10	Is there inclusive practice with regards to positive behaviour management, attendance and punctuality? Y/N <ul style="list-style-type: none"> - Pro-actively promote and support the regular attendance of pupils. - Effective reward/incentive strategies to promote participation 		
11	Is there regular assessment and review of pupil progress? Y/N Provision agrees to share weekly progress reports		
12	Are risk assessments completed for activities that pupils may undertake? Y/N (copy attached)		
13	Is there a full and clear pupil induction procedure regarding health and safety and fire evacuation? Y/N		
14	Are there robust procedures in place (including information sharing that are referenced in the SLA) to safeguard children in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N Copy of providers Safeguarding/Child protection policy attached.		
15	Has evidence of staff receiving accredited child protection training been seen? Y/N Has evidence of DSL receiving training for their role been seen? Y/N Have contact details for DSL been provided? Y/N (attached).		
16	Copy of public liability insurance document attached.		
17	Is there a policy for when members of staff are working alone with pupils? Y/N (copy attached)		
18	Does the provider have an online safety policy in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N (copy attached)		
19	Copy of health and safety policy attached.		
20	Has written confirmation from the provider that staff vetting checks have been undertaken been received? Y/N Checks include. <ul style="list-style-type: none"> • an identity check. • a barred list check. • an enhanced DBS check/certificate. • a prohibition from teaching check. • further checks on people who have lived or worked outside the UK. • a check of professional qualifications, where required; and • a check to establish the person's right to work in the United Kingdom. Has confirmation of these checks been added to the Single Central Record?		

21	Is there a Designated First Aid Officer and suitable equipment available? Y/N - Qualified First Aiders identified. - Recording system for accidents including informing host school and home		
	- Historical or current RIDDOR investigations - Evidence of full first aid kit		
22	Has confirmation been received from the provider that a representative will attend or contribute to multi-agency meetings when necessary? Y/N		

Action Plan
 If 'no' is answered to any of the questions in Part 2 an action plan must be formulated to obtain information

Action reference number.	Area for improvement	Intended action

Signed by host school:

Date:

Signed by Alternative Provision:

Date:

Appendix B: Child-on-Child Abuse Procedures

[Harmful Sexual Behaviour in School Resources | SWGfL. Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#)

We aim to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:

- Expecting all staff and Governors/Trustees in our school to ensure they are adhering to and promoting the commitments we make in our [Safeguarding Statement](#).
- Ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring that our Designated Safeguarding Lead and other relevant staff have completed training in how to assess and respond to child-on-child abuse. For further detail, please refer to [Professional Development and Support](#).
- Being clear how we expect our children to behave towards one another. Our Behaviour Policy outlines these expectations; how the school will support our children to understand and fulfil them; and how we will prevent and respond to behaviour which falls below our expected standards (including all forms of bullying). Where behaviour also indicates child-on-child abuse; staff will adhere to the processes outlined in this section.
- Ensuring we are [Teaching our children how to keep safe](#).
- Making sure that children who experience or are at risk of experiencing abuse from other children are identified, feel supported and safeguarded from further harm.
- Making sure that children who have caused or are identified as being at risk of being abusive in their behaviour towards other children are identified, supported, and safeguarded from engaging in further harmful behaviour.
- Making sure that we are taking positive action to ensure that [Children who are more vulnerable to child-on-child abuse](#) are not disproportionately impacted by child-on-child abuse in our school.

What is child-on-child abuse?

Child-on-child abuse:

- Is when a child or group of children inflicts harm or fails to act to prevent harm to another child.
- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a child can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context, we know that child-on-child abuse can take place in spaces and at times of the school day where children are less likely to be supervised. We also know that where child-on-child abuse is taking place outside of school (including online) this abuse can also continue and have an impact on a child when they are at school.
- Can be defined in different ways (examples are outlined in Keeping Children Safe in Education 2023: Part 1; pages 12-13 and Part 5; pages 106-109). • A child may experience one or multiple types of child-on-child abuse at the same time.

Children who are more vulnerable to child-on-child abuse

Please read this alongside [Children potentially at greater risk of harm](#).

Children who are perceived to be different to others can be particularly vulnerable to child-on-child abuse. When children are abused by other children; there is more often than not a misuse of power or privilege by the child(ren) causing harm. This can have a significant impact on the emotional development and mental wellbeing of the child who is being harmed; and lead them to feel isolated, unsafe, and traumatised.

Children who harm others may have additional or complex needs. Harmful behaviour by children can also be a sign or indicator that a child has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience⁶ in their life.

Children who harm other children may have power or privilege over a child(ren) they are causing harm to but can also be powerless or vulnerable in other part of their lives.

Child-on-child abuse is harmful to all children involved.

Evidence⁴ indicates that children from particular groups are more vulnerable to child-on-child abuse. This includes children who:

- Have special education needs and/or disabilities and/or health issues.
- Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes children who are looked after or who have a social worker due to safeguarding concerns.
- Are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
- Are from Black, Asian and/or other minoritized ethnic communities (including travelling communities and children for whom English is an additional Language). These children are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as children who are being harmed and more likely to be over identified as children who are a risk of causing harm. This is known as adultification bias⁵.
- Identify as Lesbian Gay, Bi-Sexual; Transgender (LGBT). These children are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.
- Are female. Girls are more vulnerable to harmful sexual behaviour and abuse in intimate personal relationships.
- Are male. Boys and are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

Where a child has several differences and would fall into multiple groups above; this further increases their vulnerability.

When is child-on-child behaviour considered abusive?

We recognise the importance of distinguishing between behaviour that is developmentally appropriate, problematic, or harmful. Harmful behaviour is abusive. It can also (but not always) include physical abuse.

In considering whether behaviour is abusive; staff should consider:

- **The impact on the child(ren) affected by the behaviour:** Any behaviour that is likely to have an impact on a child's physical and emotional health and development should be considered potentially harmful. The greater the impact of the behaviour on the child's health and development; the greater level of harm caused to them.

The needs and circumstances of the child who is identified as being potentially harmed should always be considered. This should also include ensuring that their wishes and feelings are sought and recognised in considering the impact upon them.

Even where children do not/are not able to express their wishes and feelings; staff should also pay attention to other potential signs/indicators of abuse (please refer further to [Staff Safeguarding Concerns: Recognise, Respond, Report](#))

Children raising child-on-child concerns either for themselves or others will be taken seriously and never be given an impression they are creating a problem.

⁶ See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

⁴ Evidence sources:

- Keeping Children Safe in Education 2023; Part 2: Children potentially at greater risk of harm.
- [Prevalence of bullying \(anti-bullyingalliance.org.uk\)](https://www.anti-bullyingalliance.org.uk/).
- [Safeguarding d/Deaf and disabled children | NSPCC Learning](#);
- [Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning](#); • [Safeguarding LGBTQ+ children and young people | NSPCC Learning](#);
- [Spotlight #3: Young people and domestic abuse | Safelives](#).
- [Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#) ⁵ [Adultification bias within child protection and safeguarding \(justiceinspectors.gov.uk\)](#)

The behaviour of the child(ren) who is/are causing harm: It is important to consider the behaviour of children on a continuum; taking account of their age and level of development; as well as any other needs or circumstances that may influence their behaviour (for example a child who is causing harm to other children could be an indication that they have unmet needs; or may be a sign or indicator that they are experiencing abuse, or are experiencing some other adverse experience which is having an impact upon them).

Features of abusive behaviour⁷ can include:

- A pattern of similar behaviour (this can include lower-level problematic behaviours that have occurred over time that have begun to increase in frequency or seriousness)
- A misuse of power over the child who is being harmed. (Please also see children who are more vulnerable above).
- Victimisation of the child who is being harmed. This could also include circumstances where the child causing harm is supported or joined by other children.
- Intrusive behaviour: not considering or enabling the child being harmed to freely agree and/or consent to the behaviour.
- An element of control; coercion and/or force.
- Physical/sexual violence (this does not always have to be present; but where it is so would heighten the level of concern).
- Evidence that a child is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

Our response to child-on-child abuse

In most instances, we will use our Behaviour policy to manage the conduct of children towards each other. However, where behaviour is considered abusive or indicates safeguarding concerns; then staff will also need to raise such concerns to the Designated Safeguarding Lead in line with the [Staff Safeguarding Concerns: Recognise, Respond, Report](#) section.

In responding to any concern of child-on-child abuse; we will take account of:

- Part 5 Keeping Children Safe in Education 2023.
- [Use of reasonable force in schools](#)
- [Searching, screening and confiscation at school](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [When to call the police: guidance for schools and colleges](#).

Risk and needs assessment.

All staff will immediately consider how best to support and protect **all children involved** in child-on-child abuse incidents; ensuring they act in their best interests.

⁷ Adapted from Hackett Continuum as described in [Understanding sexualised behaviour in children | NSPCC Learning](#). When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non Harmful Sexual Behaviour) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider (see [Farrer and Co \(2022\) page 35-36](#))

We may deem it necessary to complete a formally recorded risk and needs assessment for all children involved in child-on-child abuse incidents. The decision to complete a formal risk assessment will be taken by the Designated Safeguarding Lead. This formal assessment will always take place where there is evidence of [violent or abusive behaviour](#).

The purpose of the risk and needs assessment is to safeguard **all children involved** (including children who may not be at the school, such as siblings) and will clearly outline the strategies to be put in place to mitigate risk and address any identified needs.

The risk and needs assessment will be completed, taking account of information from all key staff (and relevant involved professionals) working with the children, as well as their parents/carers. It will also include the views and feelings of the children; where this is safe and appropriate to do so.

The risk assessment will be shared with all staff and relevant involved professionals who work with the children, as well as parents and carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

In circumstances where children are displaying sexual behaviour towards other children that raises concern; our Designated Safeguarding Lead is trained in and will use the Brook Traffic Light Tool to inform the risk and needs assessment.

Our template risk and needs assessment can be found on the Centre of expertise on child sexual abuse website here: <https://www.csacentre.org.uk/documents/school-safety-plan-template/>

And additional information can be found here: <https://www.csacentre.org.uk/knowledge-in-practice/practiceimprovement/education-resources>

[Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#)

Response

The parents/carers of **all involved children** will be notified of and involved in our response. We will only share the details of other children to parents/carers who do not have parental responsibility for them where we have consent to do so or where a decision has been taken to share to enable them to effectively safeguard their child (please also refer to [Record Keeping and Information Security](#))

The risk and needs assessment will inform the response taken. The following responses will be considered; (more than one response can be considered):

- **Manage internally** in alignment with our Behaviour Policy and pastoral support offer in a way which addresses the needs/risks identified. Any sanctions imposed on the child causing harm will be proportionately balanced with any other responses (such as police involvement) and take accounts of risks and needs; as well as the ongoing impact on/risk to the child who has been harmed or others. This may also include actions to make locations/school infrastructure (including online) safer; adapt our curriculum to ensure we are [Teaching our children how to keep safe.](#); or [Working in Partnership](#).
- **Offer Early Help/Targeted Early Help.** This could include offering and/or referring **any child involved** to enhanced or specialist support services to address the needs/risks identified in line with the [SSCP Thresholds document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Raise concerns to Children's Social Care** in line with the [SSCP Thresholds document](#).
- **Report to the Police.** We will take account of [When to call the police: guidance for schools and colleges](#).

Recording and monitoring

All child-on- child abuse concerns and responses will be recorded and stored on the child protection files of all involved children (Please refer to [Record Keeping and Information Security](#)). Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Behaviour Policy on CPOMs.

Appendix C: File Transfer Record and Receipt



PART 1: To be completed by sending / transferring setting, school or college.

NAME OF CHILD:	
DOB:	
NAME OF SCHOOL/SETTING SENDING CP FILE:	
ADDRESS OF SCHOOL/SETTING SENDING CP FILE:	
METHOD OF DELIVERY:	BY HAND SECURE POST ELECTRONICALLY
DATE FILE SENT:	
NAME OF DSL TRANSFERRING FILE:	
NAME OF PERSON TRANSFERRING TO:	
SIGNATURE:	

PART 2: To be completed by receiving setting, school or college.

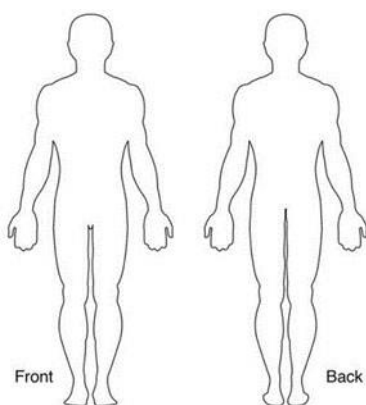
NAME OF SCHOOL/SETTING RECEIVING FILE:	
ADDRESS OF SCHOOL/SETTING RECEIVING FILE:	
DATE RECEIVED:	
NAME OF PERSON RECEIVING FILE:	
DATE CONFIRMATION OF RECEIPT SENT:	
SIGNATURE:	

Receiving School: Please complete Part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. You are advised to keep a copy for your own reference.

Appendix D: Safeguarding Concern Reporting Form

Recording a concern about a child's safety or welfare – paper version of electronic CPOMS

Part 1 – For staff use.

Child Name:			
Date of birth:		Year Group / class:	
Name of referrer:		Role of referrer:	
Details of concern: Day, date and time Location Incident Outcome of incident Investigation details <i>What are you worried about? Who? What (if recording a verbal disclosure by a child use their words)?</i> <i>Where? When (date and time of incident)?</i> <i>Any witnesses?</i> <i>What is the pupil's account/perspective?</i>			
Reported to: DSL/DDSL Staff member		Role of person reported to:	
Signed:			
Date:			

Part 2: For DSL/Deputy DSL to complete.

<p>Action taken: Is incident still active or can it be closed?</p> <p>Close where you consider there is no further action</p> <p>Include feedback to referring member of staff if applicable.</p>		<p>Advice sought: / <i>(From whom and what was advice given)</i></p>	
<p>Concern / referral discussed with parent / carer? If yes note discussion</p>		<p><i>If not, state reasons why</i></p>	
<p>Referral made: <i>Record names of individuals/agencies who have given information regarding outcome of any referral (if made).</i></p>		<p><i>If not, state reasons why</i></p>	
<p>Incident added to planner. <i>This could be waiting for an external response or internal monitoring</i></p>			<p><i>Date:</i></p>
<p>Response to / action taken with pupil:</p>			<p><i>By whom</i></p>
<p>Other notes / information: <i>When making a referral about an acute specialist need/child protection follow up with a MARF</i></p> <p>Any other action required:</p>			
<p>Signature of DSL</p>		<p><i>Date</i></p>	