SAFEGUARDING CHILDREN AND CHILD PROTECTION POLICIES AND PROCEDURES

Adopted by:	Walthamstow Academy	
Date:	September 2025	
Signed off by:	Emma Skae	Geoff Skewes
Role:	Principal	Chair of Governors
Review frequency:	Annually	
Review date:	September 2026	

Scope

This policy applies to Walthamstow Academy. United Learning Trust requires the School's Local Governing Body to review and update this policy annually (as a minimum). This policy is available on the school website. This policy is ratified annually by the United Learning Group Board.

This policy has regard to the following guidance and advice, as amended from time to time (and any supplemental guidance/advice referred to therein):

- Keeping Children Safe in Education (DfE, 2025)
- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, 2015)
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (Updated 2024)
- Mental Health and Behaviour in Schools (DfE, November 2018)
- Preventing and Tackling Bullying (DfE, July 2017)
- Working Together to Safeguard Children (DfE, Current edition/publication)
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, May 2024)
- Revised Prevent Duty Guidance: for England and Wales (Home Office, April 2023)
- The Prevent duty: safeguarding learners vulnerable to radicalisation (DfE, updated September 2023)
- Relationships education, relationships and sex education (RSE) and health education (DfE, 2025)
- Equality Act (2010) – Including Public Sector Equality Duty
- The Human Rights Act (1998)

This policy also takes into account the procedures and practice of the London Borough of Waltham Forest and the published safeguarding arrangements set out by the Waltham Forest Safeguarding Children Board (WFCSB) safeguarding partners: https://www.walthamforest.gov.uk/families-young-people-and-children/child-protection/waltham-forest-safeguarding-children-board-wfscb

The Local Governing body, and the senior leadership team, especially their designated safeguarding lead (DSL) and the deputy designated safeguarding lead (DDSLs), will:

- make themselves aware of and follow their local arrangements (including the local criteria for action and the local protocol for assessment)
- ensure this is reflected in their own policies and procedures
- supply information as requested by the three safeguarding partners
- work with social care, the police, health services and other services to promote the welfare of children and protect them from harm

Implementation

Date of last central office review:	July 2025	Review Period:	1 year (minimum)
Date of next central office review:	July 2026	Owner:	Emma Skae
Date of next school level review:	September 2026		
Type of policy:	United Learning Policy	Group Board:	Group Board approves United Learning Template Policy
		Local Governing Body:	Approves completed school policy

The Policy will be reviewed annually, as set out below:	
Policy reviewed centrally	July 2025
Policy tailored by individual schools	September 2025
Policy ratified by Local Governing Bodies	September 2025
Policy approved by the Group Board	July 2025
Implementation of Group Policy	September 2025

KEY SCHOOL CONTACT DETAILS

United Learning Trust (ULT)	**Chair of ULT** Dame Reena Keeble EMAIL: company.secretary@unitedlearning.org.uk **Head of Safeguarding** Darren Ellison-Lee, Director of Primary Education EMAIL: darren.ellison-lee@unitedlearning.org.uk **Regional Director (United Learning)** Christine Raeside EMAIL: Christine.raeside@unitedlearning.org.uk **Head of Safeguarding** Frazer Smith EMAIL: frazer.smith@unitedlearning.org.uk **United Learning Safeguarding Officer** Sara Bryson EMAIL: sara.bryson@unitedlearning.org.uk
Local Governing Body (LGB)	Chair of LGB Geoff Skewes TEL: 02085273750 EMAIL: Geoff.skewes@walthamstow-academy.org Nominated Safeguarding/E safety Governor of LGB: Leon Jacob
Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Leads (DDSLs)	**Main DSL for the School** Jess Capstick TEL: 02085273750 EMAIL: jess.capstick@walthamstow-academy.org **Deputy DSLs** Hannah McAlpine ~~Lisa Shakespeare~~ TEL: 02085273750 EMAIL: hannah.mcalpine@walthamstow-academy.org ~~Lisa.shakespeare@walthamstow-academy.org~~ **Designated E Safety Lead** Jess Capstick TEL: 02085273750

	EMAIL: jess.capstick@walthamstow-academy.org
Designated Teachers for Looked After Children	Jess Capstick TEL: 02085273750 EMAIL: jess.capstick@walthamstow-academy.org
Principal	Emma Skae Tel: 02085273750 EMAIL: emma.skae@walthamstow-academy.org

KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer (LADO)	Caroline Coyston and Susannah Bennett lado@walthamforest.gov.uk 0208 496 3646 EMAIL: LADO@walthamforest.gov.uk N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a same-day phone response during normal business hours
Local Authority Children's Social Services	TEL: 0208 496 2310 EMAIL: wfdirect@walthamforest.gov.uk OUT OF HOURS EMERGENCY DUTY TEAM TEL: 02084963000
Multi-Agency Safeguarding Hub (MASH) Single point of referral for Early Help, Child Protection and Adults' Safeguarding in Waltham Forest	TEL: 0208 496 2310 EMAIL: mashrequests@walthamforest.gov.uk Mon-Thurs, 9am-5.15pm and Fri, 9am-5pm Out of Hours: 020 8496 3000 Email: MASHrequests@walthamforest.gov.uk
Support and Advice about Extremism	**Police** PC Angel Manning (DWO-CYP) TEL: 101 EMERGENCY: 999 NON EMERGENCY NUMBER: 101 EMAIL: Angelica.Manning@met.police.uk **Local Authority** Sean Thompson TEL: 020 8496 3447 | Ext 3447 EMAIL: sean.thompson@walthamforest.gov.uk PREVENT LEAD: Sean Thompson

	Department for Education NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gov.uk CONTACT FORM: https://report-extremism.education.gov.uk/
NSPCC's what you can do to report abuse dedicated helpline	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 TEL: 0808 800 5000 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	**Disclosure Service** ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk **Barring Service** ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom **TEL:** 03000 200 190
Teaching Regulation Agency	TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED (Concerns)	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk EMAIL: CIE@ofsted.gov.uk

OTHER SERVICES CONTACT DETAILS

Adolescent Safeguarding Lead Local Authority Children's Social Care Services	Refer via MASH. Phone: 0208 496 2310 Email: Reanne.Turner@walthamforest.gov.uk
Child Death Overview Panel (CDOP) notifications	Phone: 020 8496 3691 Email: cdop@walthamforest.gov.uk cdop@walthamforest.gov.uk
Corporate Director Quality Assurance (QA)	Phone: 020 8496 3685 Email: cspahub@walthamforest.gov.uk; Darren.McAughtrie@walthamforest.gov.uk
Early Help	Phone: 020 8496 1517 Email: earlyhelp@walthamforest.gov.uk
Female Genital Mutilation (FGM) Community Safety	Refer via MASH. Phone: 020 8496 3281 Email: Sylvie.lovell@walthamforest.gov.uk
Forced Marriage Unit	Phone: 020 7008 0151 Email: fmu@fco.gov.uk.
Gangs Community Safety	Refer via MASH. Phone: 0208 496 2310 Email: Adeolu.Solarin@walthamforest.gov.uk
Harmful Sexual Behaviour Lead, Children's Social Care Services	Refer via MASH. Tel: 020 8496 5027 Mob: 0797 476 8433 Email: tracey.goddard@walthamforest.gov.uk
Mental Health First Aid / Public Health	catherine.hutchinson@walthamforest.gov.uk
Multi Agency Risk Assessment Conference (MARAC)	Refer via MASH. Phone: 0208 496 2310 Email: Dianne.Andrews@walthamforest.gov.uk
Prevent Community Safety	Refer via MASH. Phone: 020 8496 3000 Mobile: 07816150037 Email: communitysafety@walthamforest.gov.uk;

	Amy.Strode@walthamforest.gov.uk
Private Fostering	Refer via MASH. Phone: 0208 496 2310 Phone: 020 8496 1575 Email: Pamela.Levy@walthamforest.gov.uk
Special Educational Needs and Disability (SEND) Service [**formerly known as Disability Enablement Service (DES)]**	Phone: 020 8496 6503 Email: senteam@walthamforest.gov.uk
Violence against women and girls (VAWG) & Domestic Abuse one-stop-shop	Refer via MASH. Phone: 0208 496 2310 Email: vawg@watlhamforest.gov.uk; domesticabuseadvice@walthamforest.gov.uk
Virtual School	Phone: 020 8496 1741 Email: virtual.school@walthamforest.gov.uk Head of Virtual School: fay.blyth@walthamforestgov.uk

Policy Statement

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests** of the child. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The school will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Staff working with children should have an attitude of '**it could happen here**' and no reports in their school it does not mean it is not happening. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern the school will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback.

CONCERNS ABOUT A CHILD

The school always has a duty to consider the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The school has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements are outlined in the Safeguarding Handbook, shared with staff through INSET, shared with students in assembly and PSHE sessions andon posters around the Academy and published on the Academy website.

Staff should expect to support social workers and other agencies following any referral.

DEFINITIONS OF SAFEGUARDING, ABUSE, NEGLECT AND EXPLOITATION

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 that is within or outside 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 taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse, exploit, or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, by other children, or, more rarely, by others (e.g. via the internet).

Technology is a significant component in many safeguarding and well-being issues. Abuse can take

place wholly online, or technology may be used to facilitate offline abuse. In many cases abuse will take place concurrently via online channels and in daily life. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

All staff should be aware of indicators of abuse and neglect. Staff are referred to **Appendix 1** of this policy for further detail of the types of abuse and possible signs of abuse. Staff should always be vigilant and raise any concerns with the DSL or DDSL.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

If staff suspect or hear an allegation or concern of abuse or neglect from a child or any third party, they must follow the relevant procedure below.

All staff should:

- listen carefully;
- avoid asking leading questions;
- reassure the individual that the allegation/complaint will be taken seriously;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to;
- a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing on CPOMS. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

•a clear and comprehensive summary of the concern;

•details of how the concern was followed up and resolved;

•a note of any action taken, decisions reached and the outcome.

The record should be uploaded to CPOMS as an incident and include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence. The person recording the information should clearly state if what they are recording is fact or opinion.

Where a report includes online elements or the sharing of images, staff are **reminded not to view or forward any illegal images** of a child but note what has been reported. Further guidance can be found in the "Sharing nudes and semi-nudes: advice for education settings working with children and young people".

Where there is a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence.

The academy manages this by assigning one key person to work with the student and recording all decisions/conversations on CPOMS to ensure the student is heard and their wishes followed where feasible. The safeguarding offices are designed as safe havens for children to relax and talk. Vulnerable students and those with special education needs and disability (SEND), attend small group and/or 121 therapy with the social, emotional and mental health (SEMH) Learning Support Assistant (LSA). This allows the students to be supported to vocalise their wishes and concerns in a way that is appropriate for their cognitive level.

Information sharing:

Safeguarding information will often be special category personal data and the school will comply with data protection law and have due regard to the Department for Education's guidance 'Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers' (2018), and the relevant provisions of KCSIE when sharing such data. Personal information may be shared by the school with a third party (such as the police or local authority) without consent if there is a lawful basis to do so such as where doing so is in order to promote a child's welfare or where their safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent in certain circumstances. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The school operates its processes with the best interests of the student at its heart.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The school will ensure relevant staff comply with the relevant data protection principles when processing and sharing personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. As part of this, the school will ensure that members of staff:

- are confident of the processing conditions which allow them to process and share information for safeguarding purposes, including information which is 'special category personal data'.
- understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent in certain circumstances.
- Do not provide pupils' personal data where the sharing does not comply with data protection law.

When sharing information staff will ensure they comply with group data protection policies and keep records of disclosures as required by these policies. These are available to staff via the United Learning Policies Portal. For further information about how the school processes pupil personal data, please see the privacy notice on the website

Data Privacy Notice

WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT A CHILD

If staff (including governors, agency staff and volunteers) have any concerns about a child's welfare they should act immediately and should speak with the School's DSL or DDSL. If, in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the Waltham Forest Safeguarding Hub.

Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- making an early help assessment; or
- making a referral for statutory services and / or
- making a referral to the police.

If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a child in need or child protection plan). Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing (in line with this policy).

EARLY HELP

Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;

- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/ or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody , or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse;
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a student may benefit from early help should discuss this with the School's DSL or DDSL. If early help is appropriate, the DSL/ DDSL will generally lead on liaising with relevant agencies and setting up inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. The DSL/ DDSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to children's social care if the student's situation does not appear to be improving or is getting worse.

WHAT STAFF SHOULD DO IF A CHILD IS SUFFERING, OR IS LIKELY TO SUFFER FROM HARM

If staff (teaching and non-teaching, including part-time staff, temporary and supply staff, governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that an **immediate** referral to Waltham Forest's children's social care (and the Police if appropriate) is made in accordance with the Waltham Forest Multi Agency Safeguarding Hub (MASH)] referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important to provide as much information as possible as part of the referral process, to enable a contextual approach (see further below re Contextual Safeguarding).

The school's local safeguarding partners are Waltham Forest Safeguarding Children Board (WFSCB) ensures that all local children's services and agencies within Waltham Forest work together for the safety and well-being of children and young people.

WFSCB arrangements can be found at: https://www.walthamforest.gov.uk/families-young-people-and-children/child-protection/waltham-forest-safeguarding-children-board-wfscb

Local safeguarding children boards are a statutory requirement for ensuring and monitoring the effectiveness of local agencies that provide services for children up to the age of eighteen. The board works with partner agencies to promote the safety and well-being of children and young people within the borough.

The WFSCB follows guidance from Working Together to Safeguard Children 2018, and in accordance with the Children Act 1989 and the Children Act 2004.

The WFSCB is currently working on three priority areas:

•	adolescent safeguarding

•	child neglect

•	safeguarding in settings

Within Waltham Forest the safeguarding partners are:

(a)	Waltham Forest Council

(b)	NHS Waltham Forest, Newham and Tower Hamlets Clinical Commissioning Groups (CCGs)

(c)	Waltham Forest and Newham Metropolitan Police Services

If a DSL/DDSL feels that Waltham Forest Social Services are not responding appropriately to a case they can escalate the case using the procedure documented in Appendix 5.

Students who attend off-site provision, are engaged in close one to one teaching or alternative provision are supported by staff who have attended annual Child Protection Level 1 training. Staff are made clear of expectations and how to keep both themselves and students safe.

The Educational Visits Co-Ordinator (EVC) oversees all trip paperwork to ensure that relevant risk assessments and procedures are put into place. Work experience placements are screened and only businesses that meet the required safeguarding criteria will be used.

WHAT STAFF SHOULD DO IF A CHILD IS SEEN AS AT RISK OF RADICALISATION

Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must complete a Waltham Forest MASH referral or call 999. Advice and support can also be sought from children's social care.

The academy, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL or DDSL and governors responsible for safeguarding to ensure the school's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

See further below for more information on radicalisation. Further guidance can be found in the Revised Prevent duty guidance: for England and Wales April 2021.

WHAT STAFF SHOULD DO IF THEY DISCOVER AN ACT OF FEMALE GENITAL MUTILATION ('FGM')

All staff should speak to the DSL or DDSL about any concerns about FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

What staff should do if a child goes Missing from Education/Children Absent from Education

Children missing/absent from education, particularly repeatedly and/or for prolonged periods, and children missing education unexplainable and/or persistent absences from education can act as a vital warning sign of a range of safeguarding possibilities. Thismay include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures. The school's procedures for unauthorised absence and for dealing with children who go missing/absent from education are to complete the Waltham Forest Children Missing in/from Education form, to liaise with police, complete a home visit and to make a MASH referral. Further detail can also be found at Appendix 1 of this policy.

The school will report to London Borough of Waltham Forest a student who fails to attend school regularly or has been absent from school without the school's permission for a continuous period of 10 school days or more. A home visit will be completed during this time and the local authority in school Education Welfare Officer alerted.

ELECTIVE HOME EDUCATION

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will try to work together with the local authority and key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The school will inform the local authority of all deletions from the admissions register when a child is taken off roll.

WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT ANOTHER STAFF MEMBER (THIS INCLUDES MEMBERS OF THE TEACHING AND NON-TEACHING STAFF, INCLUDING PART-TIME STAFF, TEMPORARY AND SUPPLY STAFF, GOVERNORS AND VISITING STAFF, SUCH AS MUSICIANS, SPORTS COACHES, VOLUNTEERS CONTRACTORS)

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Principal. Where there are concerns/allegations about the Principal, this should be referred to the Chair of the LGB and Head of Safeguarding. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, volunteers and contractors).

WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT SAFEGUARDING PRACTICES IN THE SCHOOL

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the school's whistleblowing procedures which can be found here . There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the school, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

Staff are also able to contact the local authority designated officer (LADO) at lado@walthamforest.gov.uk or on 0208 496 3646

CHILD-ON-CHILD ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARRASSMENT)

Safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate). All staff working with children are advised to maintain an attitude of "it could happen here". Staff should recognise that even if there are no reports, it does not mean that child-on-child abuse is not happening, it may be the case that it is just not being reported

This is most likely to include, but may not be limited to:

- Abuse in intimate personal relationships between children;
- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, jokes and online sexual harassment, or misogynistic messages which may be stand alone or part of a broader pattern of abuse;
- The non-consensual sharing of indecent images*, especially around chat groups, and the sharing of abusive images, nudes, videos and pornography to those who do not want to receive it (see further below);
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

The school recognises the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be "victims" and boys "perpetrators"). Even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. As such, if staff have **any** concerns regarding child-on-child abuse, they should speak to their Designated Safeguarding Lead (or DDSL).

Child-on-child abuse can be associated with factors outside the school and can occur online and face-to-face between two or more children of any age or gender. The school therefore takes a contextual safeguarding approach to managing child-on-child abuse.

Child-on-child abuse is abuse and is never acceptable. The school takes a zero-tolerance approach. It should never be passed off or dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys".

The academy takes the following steps to minimise the risk of child-on-child abuse:

- Staff training on child-on-child abuse (covered in safeguarding training at the start of the school year)
- Education for students on sexual relationships/consent/personal safety through PSHE
- Reinforcement and support for students displaying negative behaviour
- Sexualised behaviour traffic light system followed to assess impact of behaviour
- Risk/AIMS assessment completed by the DSL lead following a sexualised incident
- Clear guidelines outlined in the behaviour policy

The academy's approach to pupil's sharing nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery) is: *Consensual image sharing, especially between older

children of the same age, may require a different response. Whilst not abusive, children still need to know it is illegal, whilst non-consensual sharing is illegal and abusive.

Further guidance can be found in the UKCIS Sharing nudes and semi-nudes: advice for education settings guidance.

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies in the first instance:

WHAT TO DO IF STAFF SUSPECT THAT A CHILD MAY BE AT RISK OR HEARS A REPORT OF CHILD-ON-CHILD ABUSE

For detailed information on what sexual violence and sexual harassment constitutes, important context to be aware of, related legal responsibilities for schools and colleges, advice on a whole school or college approach to preventing child-on-child sexual violence and sexual harassment and more detailed advice on responding to reports see the Department for Education's statutory guidance: *Keeping Children Safe in Education (2022), Part 5 – Child-on-child sexual violence and sexual harassment*

The procedures set out below have been developed following consultation with students, staff and parents and will be reviewed, at least annually, in light of an assessment of the impact and effectiveness of the policy. The school's initial response to a report from a child is important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online should not be downplayed and should be treated seriously. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told.

All staff are trained to manage a report. Effective safeguarding practice includes:

> • if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;

• not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

• recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;

• recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can memory and so children may not be able to recall all details or timeline of abuse;
• keeping in mind that certain children may face additional barriers to telling someone because of their disability, sex, ethnicity and/or sexual orientation;

• listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

• considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

• only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;

• where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS guidance on Sharing nudes and semi-nudes: advice for education settings working with children and young people.

• informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

If a staff member has a concern that a child may be at risk of or experiencing abuse by another child, or that a child may be at risk of abusing or may be abusing other children, they should discuss their concern with the DSL or DDSL without delay so that a course of action can be agreed.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately, and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The school treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

The school will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by the safeguarding team and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The school recognises that children with special educational needs and disabilities or certain health conditions can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children.

A student against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from relevant the WFSCB on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the academy will ensure that, subject to the advice of the WFSCB, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the WFSCB, such as children's social care and/ or the Police as appropriate.

REPORTS CONCERNING HARMFUL SEXUAL BEHAVIOUR (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT)

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. Important considerations will include:

- o The wishes of the victim in terms of how they want to proceed;
- o The nature of the alleged incident, including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- o The ages of the children involved;
- o The developmental stages of the children involved;
- o Any power imbalance between the children (e.g. is/are the alleged
- o perpetrator(s) significantly older, more mature, confident and well known social

- standing? Does the victim have a disability or learning difficulty);
- If the alleged incident is a one-off or sustained pattern of abuse (NB. sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- That sexual violence and sexual harassment can take place within intimate personal relationships between children;
- Any ongoing risks to the victim, other children, adult students, or school/college staff;
- Importance of understanding intra familial harms and any necessary support for siblings following incidents;
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

When there has been a report of sexual violence, the DSL (or a deputy DSL) should make an immediate risk and needs assessment in respect of each child affected by the abuse. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the "victim";
- the alleged "perpetrator"; and
- the other children (and, if appropriate, staff) at the school.

The DSL will consider as part of the school's response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the "victim" and alleged "perpetrator" and considerations regarding shared classes, sharing school premises and school transport. Any professional risk assessment will inform the school's approach.

The police will be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. A report to the police will generally be made in parallel with a referral to children's social care.

If the DSL decides to make a referral to children's social care and/or a report to the police against a "victim's" wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL or DDSL will also work closely with children's social care and other agencies are required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children's social care to ensure the welfare and safety of all children and update the risk assessments and ensure relevant protections and measures are in place for all children.

The academy will consider whether disciplinary action may be appropriate for any child/children involved. Before deciding on appropriate action the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or

abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The academy recognises that good record-keeping and monitoring of sexual violence and sexual harassment reports is essential and assists the academy in meeting its Public Sector Equality Duty.

CONTEXTUAL SAFEGUARDING

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

The academy's procedures for managing concerns/ allegations against staff who are currently working in the academy follows Department for Education statutory guidance and local safeguarding partners' arrangements and applies when staff (including supply staff, volunteers and contractors) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student; and/or
- Possibly committed a criminal offence against or related to a student; and/or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside the academy, that might make them unsuitable to work with children "transferable risk". Advice can be sought from the LADO in assessing transferable risk).

Non-recent allegations

Allegations against an adult that is no longer working/volunteering with children should be referred to the Police. Where it is known that the adult is still working/volunteering with children, all allegations (including historical/non-recent allegations of abuse) should be referred to the Police and the LADO in the local authority that the adult is working/volunteering.

Where an adult makes an allegation to the academy that they were abused as a child, they should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

If an allegation is made against anyone working with children in the Academy, the Academy should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the academy may discuss informally with the Local Authority 'designated officer' (LADO) on a no-names basis (if local safeguarding procedures allow).

All allegations should be investigated as a priority to avoid any delay.

Allegations that may meet the harms threshold

1. All allegations which appear to meet the above reporting criteria are to be **reported straight away to the 'case manager'** who is the Principal. Where the Principal is absent or is the subject of the allegation or concern, reports should be made to Chair of the LGB and Head of Safeguarding. Where the Principal is the subject of the allegation or concern, the Principal must not be informed of the allegation prior to contact with Chair of the LGB, Head of Safeguarding and LADO, and if appropriate, children's social care and the police.

2. **Welfare of the child:** Where the case manager deems that a child has been harmed, or there to be an immediate risk of harm to a child, or if the situation is an emergency, the DSL (or DDSL) should contact Children's Social Care and, as appropriate (e.g. if there is evidence of a possible criminal offence), the Police immediately.

3. **Investigating and supporting the person subject to the allegation:** Before contacting the LADO, schools should conduct <u>basic</u> enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, being careful not to jeopardise any future police investigation, such as:
   - Was the individual in the academy at the time of the allegation?
   - Could they have come into contact with the child?
   Schools should establish what initial information the LADO will require, and if in doubt check with the LADO before undertaking any initial enquiries, to ensure not to prejudice the position.

4. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. The designated officer should be informed within one working day of all allegations that come to the academy's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

5. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed with the Police/LADO. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the

individual informed of the progress of the case and will consider what other support is appropriate for the individual.

6. **Suspension:** The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, their HR adviser, as well as the police and children's social care if relevant when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the school and shall provide them with their contact details.

7. **Support for the member of staff:** whilst the welfare of the child is paramount, appropriate welfare support should also be made for the member of staff. Information is confidential, and should not ordinarily be shared with other staff, children or parents not directly involved. See further guidance in KCSIE.

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.

9. **Further investigation:** where further investigation is required, the LADO and case manager will agree how and by whom the further investigation will be undertaken.

10. The case manager will discuss with the designated officer whether a referral to the **Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency (TRA)** should be made, noting the requirements of KCSIE. For instance:
    a. If: 1) the allegation is substantiated; and 2) the person is dismissed (including by an agency) or the academy (or agency) ceases to use their services, or the person resigns or otherwise ceases to provide their services, then the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

    b. The employer has a legal requirement to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
        i. engaged in relevant conduct in relation to children and/or adults,
        ii. satisfied the harm test in relation to children and/or vulnerable adults; or
        iii. been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

    c. In a case involving serious professional misconduct by a teacher, the case manager must consider whether to make a referral to the TRA. In certain cases, the TRA will consider whether to prohibiting the individual from teaching.

11. Where the initial discussion leads to no further action, the case manager and the LADO should record the decision and justification for it; and agree on what information should be put in writing to the individual concerned and by whom.

12. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the academy's safeguarding procedures or practices to help prevent similar events in the

future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designate officer and case manager should consider how future investigations of a similar 98 nature could be carried out without suspending the individual.

13. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the designated officer) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

14. **Settlement:** Compromise or settlement agreements **should not** be used where there are allegations which indicate the person poses a risk of harm or may not be suitable to work with children and will not prevent police and/or school investigation, or referral to the DBS or TRA where the criteria are met. Failure to do so is a criminal offence. The academy will continue its investigation if the person leaves, resigns or ceases to provide their services. Schools should check the relevant provisions of KCSIE.

Information sharing

Staff should be mindful of the guidance set out in KCSIE in relation to sharing information between safeguarding partners during the course of the process of managing allegations against staff.

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

Allegation outcomes

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions (KCSIE). Low level concerns (see below) should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance (KCSIE).

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager should consider whether the child and/or person who made the allegation is in need of help or may have been abused by someone else, in which case a referral to children's social care may be appropriate.

If an allegation is shown to be deliberately invented or malicious, the principal will consider whether any disciplinary action is appropriate against a student who made it in accordance with the academy's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

SUPPLY TEACHERS AND ALL CONTRACTED STAFF

Where the academy has to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency'), they will ensure allegations are dealt with properly. They will liaise with the local authority designated officer (LADO) to determine a suitable outcome and discuss with the agency whether it is appropriate to suspend the supply teacher or redeploy them to another part.

Agencies should be fully involved and cooperate with any enquiries from the LADO, police and/or children's social care. The academy will usually take the lead because agencies do not have direct access to children or other academy staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

When using an agency, the academy will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

GOVERNORS

If an allegation is made against a governor, schools should follow their own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

ORGANISATIONS OR INDIVIDUALS USING ACADEMY PREMISES

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

CONCERNS THAT DO NOT MEET THE HARM THRESHOLD/LOW – LEVEL CONCERNS POLICY

As part of their whole school approach to safeguarding, the school will ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers (including governors) and contractors) are dealt with promptly and appropria

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside ofwork, and

- relates to their conduct outside of work which, even if not linked to a particular act or

- omission, has caused a sense of unease about that adult's suitability to work with children.

- does not meet the allegations threshold or is otherwise not considered serious enough toconsider a referral to the LADO.

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

- being over friendly with children;

- having favourites;

- taking photographs of children on their mobile phone;

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

- humiliating children.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Sharing/reporting a concern

Low-level concerns about a member of staff should be reported to the ~~designated safeguarding lead (or deputy)~~ Principal ~~/DSL/DDSL. Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the principal~~. If someone is unclear who they should share their concern with, they should share it with the United Learning Safeguarding Lead, who is part of the Central Office Team. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. ~~The DSL should inform the principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern.~~ The principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the principal may wish to consult with the DSL and take a more collaborative decision-making approach.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern should be shared with the designated safeguarding lead (or deputy), and/or Principal, and recorded in accordance with the academy's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the staff member sharing the concern does not wish to be named the academy will respect this person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example where it is necessary in order to carry out a fair disciplinary investigation) and, for this reason, anonymity can never be promised to members of staff who share low-level concerns.

If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

Self-Reporting

Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the

individual's own actions or how they could be perceived; and, crucially, it is an important means of

maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

How should a low-level concern be responded to

The ~~DSL/DDSL/~~Principal should:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;

- review the information and determine whether the behaviour (i) is entirely consistent with the academy's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;

- where the ~~DSL/DDSL/~~Principal is in any doubt whatsoever, they should seek advice from the LADO;

- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Advice should be sought from Human Resources and legal services (where necessary) about next steps.

There are a number of potential outcomes e.g.

- If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the organisation's Code of Conduct and the law it will still be important for the ~~DSL/DDSL/~~Principal to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it; In addition, the ~~DSL/DDSL/~~Principal should speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law.
- Some will not give rise to any ongoing concern and, accordingly, will not require any further action;
- Others may be most appropriately dealt with by means of management guidance and/or training;
- A low-level concern may require a conversation with the individual about whom the concern has been raised. This should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- Some low-level concerns may also raise issues of misconduct or poor performance;
- Some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate;
- A referral to the LADO as the academy believes the threshold has been met.
- The academy should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO.

The ~~DSL/DDSL/~~Principal should review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews should be made.

Recording concerns

All procedures for recording and storing of records should comply with United Learning's Data Protection Policies.

All low-level concerns should be recorded in writing by the ~~DSL/DDSL/~~Principal. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

There should be appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses;

- all external conversations – for example, with the LADO/other external agencies;

- the rationale for decisions;

- any action taken.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the academy will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the academy that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course that this would not also unreasonably disclose information of children concerned.

The academy should retain the record consistent with comply with United Learning's Data Protection policies. The academy should retain all records of low-level concerns (including those which are subsequently deemed by the ~~DSL/DDSL/~~Principal to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the ~~DSL/DDSL/~~Principal and the individual they report to (e.g. Regional Director); and senior HR officer, and the individual they report to (e.g. Head of HR). The ~~DSL/DDSL/~~Principal may store the central low level concerns file with ~~his/~~her other safeguarding and child protection records.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern should be placed and retained on the staff member's personnel file.

If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the staff member's personnel file and retained in accordance with Part 4 of KCSIE.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference, for example, misconduct or consistent poor

performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Where a low-level concern (or group of concerns) has met the threshold for referral to LADO and found to be substantiated, it should be referred to in a reference. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated, or malicious should also not be included in any reference.

The academy will refer to Part Four, Section Two of KCSIE for further advice and guidance.

STAFF BEHAVIOUR POLICY / CODE OF CONDUCT

The academy's staff behaviour policy can be found in the staff handbook and OneDrive. The aim of the staff behaviour policy is to provide clear guidance about behaviour and actionsand responses to low level concerns in order not to place students or staff at risk of harm or of allegation of harm to a student.

SAFER RECRUITMENT

The academy is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the academy including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Under no circumstances will an individual commence work <u>unsupervised</u> in sole charge of, or in unaccompanied contact with, children without a cleared DBS check. In this case, the individual will have a separate Barred List check and the academy will undertake a written Risk Assessment exercise in relation to the proposed work. All other safeguarding checks will be completed and the individual will be appropriately supervised. Please refer to Section C and Appendix 5 of the 'Safeguarding Children – HR Procedural Guidance' available on the United Learning Hub for further guidance.

Full details of the academy's safer recruitment procedures for checking the suitability of staff, members of the Academy LGB and Trustees of ULT and volunteers to work with children and young people is set out in

- United Learning / the Academy's Recruitment and Selection Policy;
- United Learning's Safeguarding Children – HR Procedural Guidance;
- United Learning's LGB Handbook; and
- United Learning's guidance: Trustees - Recruitment, Appointment, and Removal Process

These documents are available on the United Learning Hub.

The academy's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is completed with HR. (See section below on visiting speakers for more information.)

The United Learning recruitment and selection policy can be found here.

MANAGEMENT OF SAFEGUARDING

The academy's DSL is Jess Capstick who is a member of the senior leadership team.

Hannah McAlpine ~~and Lisa Shakespeare are~~ is the DDSL and the person to whom reports should be made in the absence of the DSL. This ensures there is always the required cover for the role.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the academy. The DSL's responsibility is to maintain an overview of safeguarding within the academy (including online safety and understanding the filtering and monitoring systems and processes in place), to open channels of communication with local statutory agencies, to liaise closely with safeguarding partners (such as children's social care and the police), support staff in carrying out their safeguarding duties children's social care and the police), support staff in carrying out their safeguarding duties and to monitor the effectiveness of the academy's policies and procedures in practice. The DSL (and ACPOs) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

The DSL works with the LGB to review and update the academy's safeguarding policy. Where a student leaves the Academy, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse, who have a social worker, or who are receiving support through the Channel programme, and have that support in place for when the child arrives. The school will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The DSL should be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

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The DSL will inform the safeguarding partners of any incident which they think should be considered for a child safeguarding practice review.

The DSL regularly reviews the academy and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in their absence, to a member of the senior management team or directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSL will always be available (during academy hours) for staff in the academy to discuss any safeguarding concerns. For out of hours/out of term activities, the academy's arrangements are to contact the DSL via email or phone. If the DSL cannot be contacted, staff are to contact the Principal via email or phone.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

TRAINING

Induction and training (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) are in line with advice from local safeguarding partners WFCSB.

ALL STAFF

All new staff* will be provided with induction training that includes:

- Safeguarding and child protection, including online safety
- the child protection policy, including information about the identity and role of the DSL(s) {● and DDSL}
- the behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- the safeguarding response to children who go missing from education
- the staff behaviour policy] including the academy's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- a copy of Part 1 of *KCSIE* (Current edition/publication)
- Academy leaders and staff who work directly with children will also be required to read Annex B of *KCSIE.*

Staff induction will always take place prior to staff being in contact with students and starting in their designated role. Child Protection and Safeguarding Level 1 training takes place annually during the inset days after the summer break. Copies of the above documents are provided to all 'staff' during induction. On appointment and as part of United Learning Annual Declaration, all staff will receive and sign the up-to-date versions of the Staff Student Relationship Letter and Acceptable Use Declaration. The staff behaviour policy can be found in the Staff Handbook, a copy of which each staff/temporary staff member will be given on their first day.

As part of the whole school safeguarding approach, all staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so. Staff are required to confirm receipt and that they have read the document via a signed form that HR will collect. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via an email/public notice from the DSL.
- Understand key information contained in Part One of *KCSIE*. The academy will ensure staff understanding by asking for a signature from the staff member. The document will also be referred to and explained during the Child Protection and Safeguarding Level 1 training delivered by the DSL in September and during new staff induction days. Receive training in safeguarding and child protection regularly, in line with advice from the local safeguarding partners. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge

extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.

- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The academy provides these via, for example, emails, e-bulletins and staff meetings.

DSL - DESIGNATED SAFEGUARDING LEAD

The DSL receives updated child protection training at least every two years to provide them with the knowledge skills and authority required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the [● WFCSB approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSL and ACPOs are trained to the same level as the DSL.

*Whilst external catering and maintenance staff are not technically United Learning/academy employees (and therefore safeguarding training is not the responsibility of the academy), they should receive an appropriate safeguarding induction to ensure they are aware of and understand all the academy's relevant safeguarding policies (e.g. safeguarding policy/whistleblowing policy).

GOVERNORS AND TRUSTEES

All governors and trustees must receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in are effective and support the delivery of a robust whole school approach to safeguarding. This training should be regularly updated.

All governors (and proprietors) should be aware of their obligations under the Human Rights Act 1998 and, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Reena Keeble is the board-level lead designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. Leon Jacob is the LGB lead designated to take a lead in relationto responsibility for the safeguarding arrangements in the academy. They are a member of the Academy's LGB.

A review of the academy's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The DSL will review the policy and update with any changes throughout the year and will complete an annual review of the policy at the end of each academic year. The policy is then ratified by the LGB and shared with staff and parents/carers. The academy draws on the expertise of staff, including the DSL, in shaping the academy's safeguarding arrangements and policies. .

If there has been a substantiated allegation against a member of staff, the academy will work with the Local Authority designated officer (LADO) to determine whether there are any improvements to be made to the academy's procedures or practice to help prevent similar events in the future.

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

TEACHING CHILDREN HOW TO KEEP SAFE

The LGB ensures that all students are taught about safeguarding, including online, through the curriculum, Relationships and Sex Education and Health Education and PSHE to help children to adjust their behaviours to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. It will also include teaching students, for example, about healthy relationships, consent and that sexual violence and sexual harassment is always wrong.

The academy recognises the additional risks that children with SEND face online and works with the SENCO and Head of IT to ensure that additional support and measures are in place to support these children. Online safety is an integral part of the academy's computing curriculum and is also embedded in PSHE and Relationships and Sex Education for all students and is taught in an age appropriate way relevant to students' lives. Students will be taught what positive, healthy and respectful online relationships look like; the effects of their online actions on others; how to recognise and display respectful behaviour online; how to use technology safely, responsibly and securely; and where to go for help and support when they have concerns. It is essential that children are safeguarded from potentially harmful and inappropriate online material. A whole academy approach is taken to online safety in the E-Safety Policy that empowers the academy to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The academy has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online, which must be regularly reviewed for their effectiveness. The academy's systems are Lightspeed. Impero and Senso. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

The leadership team and relevant staff must have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively. Staff should escalate all concerns via immediate reporting on CPOMS. The academy will communicate with parents and carers to reinforce the importance of children being safe online and to help them understand what systems schools and colleges use to filter and monitor online use. It will be especially important for the academy to make parents and carers aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the academy (if anyone) their child is going to be interacting with online.

Further detail of the academy's approach to online safety can be found in United Learning E-Safety Policy (available on the United Learning Hub) and in the academy E-Safety policy and Acceptable Use Policy which also includes detail on the use of mobile technology in the academy (and accessing 3G 4G and 5 technology on the academy premises) and the Academy's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the academy's systems.

LOOKED AFTER CHILDREN (AND PREVIOUSLY LOOKED AFTER CHILDREN)

Looked after children (and previously looked after children) are a particularly vulnerable group. The academy will ensure that prompt action is taken when necessary to safeguard these children and the LGB ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

Jess Capstick is the designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs identified in personal education plans are met. The academy ensures that the designated member of staff receives appropriate training to carry out their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

CHILDREN POTENTIALLY AT GREATER RISK OF HARM (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, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Where the local authority has made the academy aware a child has a social worker, the designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

This information will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

USE OF 'REASONABLE FORCE'

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The academy recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND, mental health or with medical conditions. The academy will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

The academy procedure for use of reasonable force can be found in the academy behaviour policy which is written in conjunction with the Department for Education's advice.

ARRANGEMENTS FOR VISITING SPEAKERS

The academy has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The academy's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the academy and British values.

The academy is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases,

the academy may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the academy site, will be supervised by a academy employee. On attending the Academy, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The academy shallalso keep a formal register of visiting speakers retained in line with its Data Protection Policy.

The visitor will be issued with a coloured lanyard that they must wear at all times.

The colour of the lanyard determines the level of clearance that the visitor has to move around the academy and interact with students. Staff are made aware of the lanyard colours during training and encouraged to challenge a visitor if they have a red lanyard and are seen on their own.

Lanyard Colour	DBS cleared and seen by WA	Supervised contact with students	Unsupervised contact with students	Can move freely around building	Must be met at reception
Red Visitor	✗	✓	✗	✗	✓
Green Visitor	✓	✓	✓	✓	✗
Yellow Contractor	✓	✗	✗	✗	✓

USE OF SCHOOL OR COLLEGE PREMISES FOR NON-SCHOOL/COLLEGE ACTIVITIES

Where governing bodies or proprietors hire or rent out academy facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the academy on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the academy roll. The governing body or proprietor will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Alternative provision

Where the school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and will ensure it is satisfied that the placement meets the pupil's needs.

The academy will obtain written information from the alternative provider that appropriate

safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes), so that the school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The school will know where a child is based during school hours and will have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They will regularly review the alternative provision placements they make. Reviews will be at least half termly to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed

Use of mobile phones and cameras (and other relevant devices)

The school's policy on the use of mobile phones and cameras (and other relevant devices) in the setting can be found in the school's behaviour policy. Students can use their mobile phones before school and after school. Students are permitted to bring their mobile phones to school, but they must be turned off and kept in their school bag or locker during the school day. Staff are permitted to use their mobile phones during the school day for personal reasons. Staff who wish to take photos or videos of students (whether on a personal or school device) must first speak to the student and seek permission from the senior leadership team.

WAIVER FROM DISQUALIFICATION

In certain circumstances, a person who is disqualified from registration by Ofsted may apply to Ofsted for a waiver of disqualification unless, for example, they are barred from working with children.

POLICE ATTENDANCE ON SCHOOL SITE (STATUTORY GUIDANCE – PACE CODE C 2019)

Students may only be interviewed at their place of education in exceptional circumstances and only when the principal or the DSL agrees. Every effort will be made to notify the parent(s) or other person responsible for the student's welfare and the appropriate adult, if this is a different person, that the police want to interview the student and reasonable time will be allowed to enable the appropriate adult to be present at the interview. If awaiting the appropriate adult would cause unreasonable delay, and unless the student is suspected of an offence against the educational establishment, the principal or their nominee will act as the appropriate adult for the purposes of the interview.

CHILD DEATHS

Whenever a child dies in England, there is a statutory process required of all schools to submit information via a 'Form A' to the Child Death Overview Panel (CDOP), a multi-agency panel overseen by the partnership boards, including the Local Safeguarding Children's Board (LSCB). This process occurs as a matter of urgency as soon as the death is known about. In Waltham Forest this process is completed online. The CDOP is responsible for reviewing all child deaths for Borough residents.

If a member of staff hears about a student's death, during term-time or holidays, they should click on the link below and complete the Form A as an 'Expected death' or an 'Unexpected death', with as much information that they have available and submit directly online:

https://www.ecdop.co.uk/walthamforest/Live/public

This will come directly to the CDOP Coordinator of the relevant borough, and the review process can begin. Information gathering with Form B will be through the same cloud-based system and can only be filled in by the person it is sent to. A password will be given for them to reset and keep for future activity. They can draft save the form as they go until you save as final. To keep a pdf copy, print and save as prior to save as final.

Waltham Forest has its own leaflet "When a child dies" to explain the CDOP process to the family (see appendix 6). It has a section for the parent/carer to have a voice at the review Panel. This is to be explained to the parent/carer by the lead person known to the family.

Involvement with child or infant death can be difficult and can cause an individual to question their professional capacity and extent to which they should get involved with the bereaved family.

Further help and advice is available from the Lullaby Trust bereavement support line on 0808 802 6868 or their information line on 0808 802 6869. Both are open to professionals as well as parents/carers.

USEFUL LINKS

- Lullaby Trust https:// https://www.lullabytrust.org.uk/bereavement-support/
- Child Bereavement UK https://childbereavementuk.org/

APPENDIX 1 –FURTHER INFORMATION

Further information is available from cdop@walthamforest.gov.uk / 020 8496 3691.

Waltham Forest contacts: (Bella.Lowen@walthamforest.gov.uk / cdop@walthamforest.gov.uk)

All staff should be aware of indicators of abuse and neglect, as well as specific safeguarding issues such as child criminal exploitation and child sexual exploitation.   Staff should always be vigilant, and if unsure, should **always** speak to the DSL or DDSL.

All academy staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from other children within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

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

EMOTIONAL ABUSE: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Staff are referred to DfE guidance Sexual Violence and Sexual Harassment for further information.

SEXUAL ABUSE: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children (also known as child-on-child abuse) is a specific safeguarding issue in education and **all** staff should be aware of it and of the academy's policy and procedures for dealing with it.

NEGLECT: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

SPECIFIC SAFEGUARDING ISSUES: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic abuse; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

CHILD CRIMINAL EXPLOITATION (CCE) AND CHILD SEXUAL EXPLOITATIONS are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

More information can be found at:

[Multi-agency practice principles for responding to child exploitation and extra-familial harm](#)

Non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice.

CHILD CRIMINAL EXPLOITATION (CCE) Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are

not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CHILD SEXUAL EXPLOITATION (CSE): CSE is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact: it can also occur through the use of technology.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; can still be abuse even if the sexual activity appears consensual; can include both contact (penetrative e.g. rape and oral sex and non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing) and non-contact sexual activity (such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. It can take place in person or via technology, or a combination of both; can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media); can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

CSE is a geographically widespread form of harm that is a typical **feature of county lines** criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking. The DSL or DDSL will consider a referral to the National Referral Mechanism as soon as possible if there are county line concerns, such as a child being a potential victim of modern slavery or human trafficking.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with **serious violent crime**. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

If staff have a concern about a child or a child makes a report to a member of staff, staff should follow the referral process in this policy. If staff are in any doubt about what to do, they should speak to the DSL or DDSL.

COUNTY LINES: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

The Home Office have provided further information in the document below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf

SO CALLED 'HONOUR BASED' ABUSE: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. It can include multiple perpetrators.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the multi-agency statutory guidance on FGM.
https://www.gov.uk/government/publications/multi-agency-statutoryguidance-on-female-genital-mutilation

If staff have a concern that a student may be at risk of HBA or has suffered HBA, they should speak to the DSL (or DDSL). As appropriate they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a student over 18, teachers should follow the academy's local safeguarding procedures.

FORCED MARRIAGE: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at:
https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage . School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

PREVENTING RADICALISATION: Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of the academy's safeguarding approach.

• **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or

2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

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

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

SPECIAL EDUCATIONAL NEEDS AND/OR DISABILITIES OR PHYSICAL HEALTH ISSUES: Students with SEND or certain health conditions can face additional safeguarding challenges. They may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Students with SEND are more likely to be abused by other children. The barriers to recognising abuse and neglect of this group of children can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or health condition without further exploration;
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, including prejudice-based bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

To address these additional challenges, the academy has put in place the following pastoral support measures:

- academic mentoring led by LSAs
- social story and comic strip time with the safeguarding team
- rigorous SEND training for all teaching staff at least twice per year

- open door drop in with a student support advisor every break and lunch time
- annual person-centred reviews completed by the SENCO and assessment planning and review officer (APRO)

Further guidance can be found in the DfE guidance Supporting pupils at school with medical conditions, and where applicable in the SEND Code of Practice.

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEN.

LESBIAN, GAY, BISEXUAL or GENDER QUESTIONING: This is not in itself an inherent risk factor for harm. However, children can be targeted by other children. In some cases, a child who is perceived by other children to be Lesbian, Gay, Bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as Lesbian, Gay, Bisexual or gender questioning .

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The academy provides a safe space for children to speak out or share their concerns with members of staff. this is embedded in PSHE and Relationships and Sex Education for all students and is taught in an age appropriate way relevant to students' lives. Students will be taught what positive, healthy and respectful relationships look like; the effects of their actions on others; how to recognise and display respectful behaviour; and where to go for help and support when they have concerns. All students are guided to trusted adults through the curriculum and posters displayed in every room and common area across the academy.

CHILDREN AND THE COURT SYSTEM: Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and this willbe stressful for them. Making child arrangements following separation can also be stressful and entrench conflict in families. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds, links can be found in Annex B of KCSiE.

CHILDREN WHO GO MISSING FROM EDUCATION/CHILDREN ABSENT FROM EDUCATION OR SCHOOL: A child going missing is a potential indicator of a range of safeguarding possibilities, such as abuse or neglect. The academy holds more than one emergency contact number for each student so additional options are available to contact a responsible adult when a child goes missing is also identified as a welfare and/or safety concern.

Staff must follow the academy's procedures for dealing with children who go missing, particularly on repeat occasions. The academy's procedure for dealing with children who go missing can be found in the Academy's Attendance Policy. All unexplained or unauthorised absences will be followed up in accordance with this Attendance Policy.

The academy shall inform the local authority of any student who is going to be added to or deleted from the academy's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and

b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The academy will inform the local authority (and the local authority where the child is normally resident) of any student who fails to attend school regularly or has been absent without the academy's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the academy and the local authority. This will take place every Tuesday where applicable.

Action should be taken in accordance with this policy if any absence of a student from the school gives rise to a concern about their welfare.

CHILDREN WITH FAMILY MEMBERS IN PRISON: Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy.

CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a the academy can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.organd www.clevernevergoes.org.

Children in need: defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child with a disability. Local authorities are required to provide services to safeguard or promote the welfare of children in need, and they may be assessed under s17 Children Act 1989.

DOMESTIC ABUSE: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

HOMELESSNESS: Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. The DSL or DDSL will raise/progress any concerns about homelessness with the Local Housing Authority although this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.

CHILD-ON-CHILD ABUSE

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to):

- abuse within intimate partner relationships between children/peers;
- bullying (including cyberbullying) prejudice-based and discriminatory bullying;
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- consensual and non-consensual sharing nudes and semi-nudes images and videos (also known as sexting or youth produced sexual imagery);
- upskirting (see below);
- initiation/hazing type violence and rituals (this could include abuse or humiliation used as a way of initiating a person into a group or event including online).

It can happen both inside and outside school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse, how to identify it and respond to reports. **Even if there are no reports in the school, this does not mean that it is not happening. Any concerns regarding child-on-child abuse must be referred to the DSL or DDSL.**

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN IN SCHOOLS AND COLLEGES

CONTEXT

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;

• not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

• challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

WHAT IS SEXUAL VIOLENCE AND SEXUAL HARASSMENT?

SEXUAL VIOLENCE

It is important that academy staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

RAPE: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

ASSAULT BY PENETRATION: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

SEXUAL ASSAULT: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

CAUSING SOMEONE TO ENGAGE IN SEXUAL ACTIVITY WITHOUT CONSENT: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could be forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

WHAT IS CONSENT?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

a child under the age of 13 can never consent to any sexual activity;

• the age of consent is 16;

• sexual intercourse without consent is rape.

SEXUAL HARASSMENT

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

• sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

• sexual "jokes" or taunting;

• physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

• online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

  o non-consensual sharing of nudes and semi-nudes images and videos;
  o sexualised online bullying;
  o unwanted sexual comments and messages, including, on social media;
  o sexual exploitation; coercion and threats; and
  o upskirting.

UPSKIRTING

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

THE RESPONSE TO A REPORT OF SEXUAL VIOLENCE OR SEXUAL HARASSMENT

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy).

MENTAL HEALTH

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a

lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Reference should be made to:

Mental Health and Behaviour in schools DfE guidance (November 2018);

DfE guidance 'promoting and supporting mental health and wellbeing in schools, which details numerous resources available to schools; and

Public Health England: Promoting children and young people's emotional health and wellbeing a whole school and college approach

Paragraphs 183-185 of 'Keeping Children Safe in Education'

The academy has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Staff are trained on how to identify mental health concerns in students. All mental health concerns, no matter how low level a member of staff may deem them, should be reported to the DSL via CPOMS.

MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

CYBERCRIME

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

A WHOLE SCHOOL CULTURE OF SAFEGUARDING

The Public Sector Equality Duty helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures.

APPENDIX 2 – Meet the Safeguarding Team

APPENDIX 3 – Safeguarding Training Log

APPENDIX 3 SAFEGUARDING TRAINING LOG 2024-2025		
Attendees	Type of training provided	Date undertaken
Principal/Head	Level 3 Safeguarding and Child Protection for Designated Persons Course	September 2024
DSL	Level 3 Safeguarding and Child Protection for Designated Persons Course	JCK – August 2025
DDSL	Level 3 Safeguarding and Child Protection for Designated Persons Course	December 2024
Senior Leadership Team	Level 3 Safeguarding and Child Protection for Designated Persons Course	ESE – Sept 2024 JCK – August 2025 ACL – Sept 2024 SCI – Sept 2023 BWI – April 2025 AKM – June – 2025 DVS – To do Sept 2025 PMA – To do Sept 2025
HOYs	Level 2 Safeguarding and Child Protection, E Safety and Prevent training	GAM – Oct 2024 IRA – To do Sept 2025 HAD – To do Sept 2025 RGN – To do Sept 2025 RHN – To do Sept 2025 JPN – Jan 2023 (to be refreshed Sept 2025) AJN – Nov 2023 SAE – Oct 2022 (to be refreshed Sept 2025) ABS – Dec 2023 FRO – Dec 2023 LHA – Dec 2023 EBY – Dec 2022 (to be refreshed Sept 2025)

Head of Conduct	Level 3 Safeguarding and Child Protection for Designated Persons Course	February 2024
Medical Welfare Officer	Level 3 Safeguarding and Child Protection for Designated Persons Course	March 2024
Student Support Officer	Level 3 Safeguarding and Child Protection for Designated Persons Course	September 2024
Whole School	Level 1 Safeguarding and Child Protection, E Safety and Prevent training	September 2025

e-safety Lead	Level 1 Safeguarding and Child Protection, E Safety and Prevent training	September 2025
P.E. staff	Level 1 Safeguarding and Child Protection, E Safety and Prevent training	September 2025
Health & Safety /COSH	Level 1 Safeguarding and Child Protection, E Safety and Prevent training	September 2025
EVC	Level 2 Safeguarding and Child Protection, E Safety and Prevent training	To do Sept 2025
Chair of Governors of LGB	Safer Recruitment Level 1 Safeguarding and Child Protection, E Safety and Prevent training Safeguarding Children and Young People Level 2	Safer Recruitment – Oct 2022 Safeguarding Level 1 – Sept 2025
Nominated Safeguarding Governor Lead	Level 3 Children Safeguarding	
Local Governing Body (whole board)	Level 1 Safeguarding and Child Protection, E Safety and Prevent training	Will be complete at first Governor's meeting of this academic year 13.10.2025
Agency Staff /Peripatetic	Level 1 Safeguarding and Child Protection, E Safety and Prevent training	September 2025
Volunteers	Safeguarding leaflet outlining WA procedures	Upon arrival at academy
Contractors	Safeguarding leaflet outlining WA procedures	Upon arrival at academy

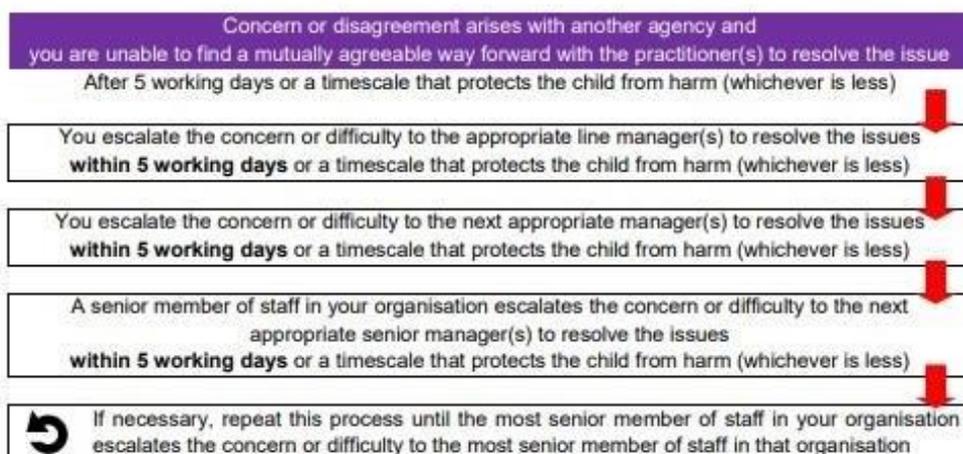# APPENDIX 4 - WALTHAM FOREST ESCALATION PROCEDURE

Re: How to escalate professional concerns about a child

June 2019

Dear Colleague,

I would like to advise you and staff in your organisation who have a child protection responsibility how to take action using the appropriate channels when you believe that your professional opinions have not been acted on appropriately. Please disseminate this advice widely to appropriate staff. For example, if you have concerns regarding the lack of response to professional opinions and judgements expressed by your staff about safeguarding matters including concerns that social care services are not taking appropriate actions regarding the well-being of a child or are not responding in a timely fashion to your concerns. Below is a flow chart and the relevant telephone numbers to support escalating your concerns:

> **Concern or disagreement arises with another agency and you are unable to find a mutually agreeable way forward with the practitioner(s) to resolve the issue**
> After 5 working days or a timescale that protects the child from harm (whichever is less)

> You escalate the concern or difficulty to the appropriate line manager(s) to resolve the issues
> **within 5 working days** or a timescale that protects the child from harm (whichever is less)

> You escalate the concern or difficulty to the next appropriate manager(s) to resolve the issues
> **within 5 working days** or a timescale that protects the child from harm (whichever is less)

> A senior member of staff in your organisation escalates the concern or difficulty to the next appropriate senior manager(s) to resolve the issues
> **within 5 working days** or a timescale that protects the child from harm (whichever is less)

> If necessary, repeat this process until the most senior member of staff in your organisation escalates the concern or difficulty to the most senior member of staff in that organisation

Care and Support

In the first instance please raise any concerns directly with the manager of the allocated worker. If there is no allocated social worker please speak to the manager of referral and advice as below

Team Manager Multi-Agency Safeguarding Hub (MASH) / Referral and Advice	020 8496 2317 07776 589603

If you feel your concerns have still not been acted on appropriately then please escalate your concerns to the relevant head of service

Head of Service – MASH	020 8496 4831 07929 205 209
Head of Service – Settings and Workforce Safeguarding	020 8496 3628 07791 559 789
Head of Service Safeguarding and Family Support	020 8496 1375
Head of Service Corporate Parenting	020 8496 2184 020 8496 3274 020 8496 2186
Head of Service Quality Assurance	020 8496 3250

Strategic Partnerships Unit, Waltham Forest Town Hall
Telephone: 0208 496 3231/07968 693191

Strategic Partnership Boards

Re: How to escalate professional concerns about a child

Where you remain concerned following your discussion with the head of service, a senior member of staff in your organisation should then speak to the relevant Assistant Director:

Assistant Director, Safeguarding and Family Support	020 8496 1907 0798 070 3139
Assistant Director, Corporate Parenting	020 8496 1907 079 8070 3139
Assistant Director, Quality Assurance	020 8496 3685

If there still remains concerns following the discussion with an Assistant Director, a senior member of staff in your organisation should then speak to:

Corporate Director for Care & Support, Families and Homes Directorate	020 8496 3205

If concerns still remain, the most senior manager in your organisation should speak to:

Deputy Chief Executive, Families and Homes Directorate	020 8496 3501

It is important that concerns are speedily escalated within the management structure for Care & Support until a satisfactory resolution of the concern is secured.

Other agencies

If you have any concerns related to the safeguarding practice of any other agencies, in the first instance please speak to the team manager of the practitioner as per the flow chart above, and if you remain concerned please follow the stages accordingly by asking for the next appropriate manager to speak to and involving your own manager(s) and senior managers as required.

Schools	Director of Learning and Systems Leadership	020 8496 6616 07816 135 090
Barts Health at Whipps Cross Hospital	Named Nurse for Safeguarding	020 8539 4414
Police	Detective Chief Inspector, North East Command, Borough Police	020 7230 4591 07595 011 449
Community Health Services, school nursing, health visitors, child and adolescent mental health services	Named Professional for Safeguarding, NELFT	0300 555 1201 - 53340 07808 736 295
Waltham Forest Clinical Commissioning Group (WFCCG)	Designated Nurse for Safeguarding and Looked After Children, WFCCG	020 3688 2670 07930 195 306

If you have any general enquiries, please contact Zahra Jones, Strategic Partnerships Coordinator for WFSCB on 020 8496 3231/07968 693 191, alternatively email Zahra.Jones@walthamforest.gov.uk
Please bring this letter to the attention of all staff.

Yours sincerely,

Dave Peplow, Waltham Forest Safeguarding Children Board Independent Chair

Useful contacts

Support and resources for bereaved parents and families:

The Child Bereavement Trust Helpline:
0800 02 888 40 (office hours)
www.childbereavement.org.uk

The Compassionate Friends
Dedicated to the support of bereaved parents, siblings and grandparents.
Helpline: **0345 123 2304**
Office 0345 120 3785 (9.30 - 4.30 Mon to Fri)
www.tcf.org.uk

Cruse (Bereavement Care)
Support and free counselling for bereaved people
Helpline: **0808 808 1677**
www.cruse.org.uk

The Lullaby Trust
Bereavement support helpline following death of a baby or young toddler
Helpline: **0808 802 6868**
(10.00am-5.00pm Mon-Fri, 6.00pm-10.00pm weekends)
www.lullabytrust.org.uk

Sands (Stillbirth and Neonatal Death Society)
Helpline: **020 7436 5881**
www.uk-sands.org

Useful contacts

Support for bereaved children and those supporting them

Child Bereavement Charity
Support and Information **0800 02 888 40**
Monday to Friday, 9:00am - 17:00pm
www.childbereavementuk.org

Grief Encounter
Helpline **020 8371 8455**
Monday to Thursday 9:00am -17:00pm
http://www.griefencounter.org.uk/

Winston's Wish
Helpline: **08452 03 04 05**
A national helpline offering support, information and guidance to all those caring for a child or young person who has been bereaved
Monday to Friday 9:00am -17:00pm, also Wednesday 19:00-21.30pm
www.winstonswish.org.uk

When a Child Dies

Information for parents and carers about the Child Death Overview Process

Waltham Forest

Introduction

We would like to express our sincere condolences at this sad time. Talking and thinking about a child's death is a sensitive and painful subject. We understand that this can be particularly upsetting for parents, families and carers. This leaflet explains some of the things that have to happen after your child has died. It also provides a list of organisations that you might find useful.

Since 2008 the Government legally requires each local authority to review every child death under the age of 18 years. This is called the Child Death Overview Panel (CDOP). The more that we understand about why your child died, the more we can help to prevent the deaths of other children in the future.

There are two types of death: Expected and Unexpected.

An expected death follows on from a period of illness or long standing medical condition that has been identified as terminal and where active prevention is not possible.

An unexpected death is defined as one which was not anticipated as a significant possibility for example, 24 hours before the death; or where there was an unexpected collapse or incident leading to or precipitating the events which lead to the death.

There are 2 main parts to the CDOP process:

1. Rapid Response following an unexpected death of a child

A meeting called a 'rapid response' is held by a group of key professionals who ascertain the facts surrounding how your child died unexpectedly. This may take place within the first few days of your child's death. This response is led and co-ordinated by a children's consultant called a designated paediatrician. This may mean a visit (but not always) to where your child died by a police officer, health professional and/or social worker.

The purpose of the meeting is to make sure all relevant information is available to the review process and that the support offered to the family is co-ordinated.

2. The Child Death Overview Panel (CDOP)

CDOP reviews all deaths under 18 years. The panel uses information about each child's death to consider whether it can make any recommendations to prevent similar deaths or to improve services for children and families. Anonymised data and recommendations may be shared both locally and nationally.

The CDOP has representation from public health, local health services, social care services, and police. Other organisations may be invited to give specialist advice.

Parents/Carers may feel able to contribute

The CDOP is there to ensure families get the right support following their child's death. You are invited to share information about your child that you feel may help the process. It is not possible for parents or family members to attend the CDOP meetings. However, we would be happy to let you know the findings if you would find this helpful. You can contact the Chair of the CDOP via the CDOP co-ordinator:

Email: **cdop@walthamforest.gov.uk**
Telephone: **020 8496 3691**
Address: Town Hall, Forest Road, Walthamstow, E17 4JF

All the information the CDOP reviews is treated with respect and in strictest confidence. None of the findings, recommendations or reports will name your child or family.

The Coroner

All unexpected deaths must be reported to the Coroner. This will have been explained by the doctors and professionals following your child's death. Whilst the Coroner is independent of the process, they will be invited to share relevant information with the CDOP. We will also share information with them.

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APPENDIX 5 – STAFF/STUDENT RELATIONSHIP LETTER AND GUIDANCE NOTES

United Learning
Annual Staff Trainin

September 2025

Dear Colleague,

Welcome back. I hope you had a relaxing and enjoyable summer break.

At the start of each school year, we take the opportunity to re-emphasise some important principles about working in United Learning. We work in education to benefit children and young people, and our overarching goal is to do the right things for them, to enable them to lead purposeful lives as good citizens, prosper, succeed and be happy.

Before anything else, therefore, our first priority is that children in our care are appropriately protected and kept safe. That is the main subject of this letter. Additionally, in order to maximise benefit to children and young people from our work and from the education they receive, there are also some other basic things we have to get right – rules that we must comply with for the good reason that ultimately, following them will benefit children and our ability to serve them.

We must look after public and charitable resources properly – the money we have is there for the benefit of the pupils we serve now and in the future and we must therefore prevent fraud, loss or from the money being used wrongly. We must make sure that other people – including our colleagues, families and the wider community – are treated properly, so that United Learning is a great place to work and serves the public properly. We must protect personal data and our systems – if they are compromised, that could cause direct harm to people or serious financial loss.

Your Headteacher will be sharing some key messages and general principles about these things at the start of term and we will be asking you to sign to say that you have read, seen and understood these. Failure to act in accordance with these principles could have serious consequences for your school and may be a disciplinary offence.

However, I want to stress that an honest mistake made in diligently trying to do your job well is not a hanging offence and that the right thing to do if you think something may have gone wrong is to come forward at the earliest opportunity. Most problems can be solved if we work together – but if, for example, you click on a link that might be dodgy but then don't tell anyone, that's when problems escalate.

Turning now to safeguarding of children, we are all acutely aware that the protection of children is of the highest importance, whatever our individual roles. We also have a responsibility to protect ourselves and others against the possibility of false accusation: openness and transparency are fundamentally important here. Attached to this letter are some important principles about how we conduct our relationships with students which you should read and reflect on.

It is also important that you read and familiarise yourself with the DfE's statutory guidance on [Keeping Children Safe in Education](#), which is updated every year, and ensure that you understand your responsibilities to safeguard and promote the wellbeing of children.

You must notify your Headteacher immediately about any circumstances which could result in a change to your DBS status or may call into question your suitability to work with children, such as any investigations by police or social services and any police charges, cautions or convictions.

FOR STAFF WORKING IN OR MANAGING RELEVANT EARLY OR LATER YEARS PROVISIONS

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As part of your role you must confirm that you have not been involved in any activity/incident in the last 12 months which would render you disqualified from working with children under the Childcare (Disqualification) Regulations 2018. If anything has changed, please inform your Headteacher.

FOR EARLY YEARS SETTINGS ONLY to comply with the requirements of the DfE Statutory Framework on the Early Years Foundation Stage 2021

As part of your role you must confirm that you are not currently taking any medication that is likely to impair my ability to look after children properly. If anything has changed, please inform your Headteacher.

In sending these reminders to everyone, I am of course conscious that it is your care and concern for children and young people and your daily efforts to support them that is what makes our schools great places for young people to be. I hugely appreciate your devotion and commitment to your work.

The trust placed in us as we guide young people through their formative years is great and we need to help each other to shoulder this responsibility to the very best of our ability. Thank you again for all you have done and continue to do for children and young people in our schools.

Yours sincerely,

Sir Jon Coles
Chief Executive
United Learning

Guidance on staff student relationships – general principles

c) The relationship between staff and students is a professional one. Whilst it is expected that staff in school have a friendly and caring relationship with students, the relationship remains professional, not personal.

d) A personal relationship may occasionally arise due to family circumstances: for example if your own children are friends with those in the school or if you have a personal relationship with parents of children in the school. This can be appropriate as long as school leaders are aware. Otherwise a personal relationship between any staff member and student is inappropriate.

e) It is not appropriate for a student to visit a member of staff in their own home, or for a member of staff to meet with a student out of school hours or off school premises, without the express knowledge and consent of school leaders and the student's parent or guardian.

f) Over-familiar words and actions, displays of affection, singling children out with gifts or special attention, and discussion of one's private life or the personal life of the student are almost always inappropriate. Sexual innuendo is wrong in all circumstances.

g) Members of staff who need to work on a one-to-one basis with students in the course of their professional duties should either use a room which has vision panels in the door or keep the door open and ensure that colleagues know the meeting or lesson is taking place.

h) Staff should avoid driving students in their own cars where possible and ensure that they are not alone with just one student. Written parental consent should be obtained and a central dropping-off point arranged rather than home drops.

i) Physical contact with students must be avoided. This may be justifiable in limited circumstances: for example to pick up a young child who has fallen over in the playground, to break up a fight, or to restrain a student who

risks causing injury to themselves or others. In the latter scenarios 'reasonable force' may be used, which means 'no more force than is needed'. Current DfE guidance is contained in ['Using Reasonable Force: Advice for head teachers, staff and governing bodies'](). Members of staff must familiarise themselves with the school's physical restraint or behaviour policy and seek any clarification needed.

j)   Occasionally it is necessary for professional academic reasons for staff to communicate with students out of school. A school mobile phone should be used where possible. Personal email addresses, phone numbers, social media contact details, online aliases or text-based messaging aliases must not be given, requested or used. Records of all contact must be kept on the student file, including the reason why personal contact was necessary.

k)   It is not appropriate for boarders to have access to staff residential accommodation except in exceptional circumstances, with more than one adult present, and with the agreement of a school leader.

l)   Any gathering organised as part of a celebration should usually be held on school premises. Staff should not consume alcohol whilst in the company of children.

m) Social networking sites such as Facebook, X, Instagram, WhatsApp, TikTok, SnapChat, LinkedIn, YouTube, gaming platforms and other digital media pose risks for staff in relation to professional integrity and student welfare.

(a)   Staff must not use these sites to contact or communicate with current students, former students under the age of 18 or those who have recently left the school.

(b)   Staff must take care when posting or commenting on posts to avoid putting themselves at risk of any accusations or of bringing their school into disrepute.

(c)   If you become aware of inappropriate material online about yourself, the school, a student, a colleague or the Group, you must inform a senior leader and they will instruct a member of staff to check the allegations and inform the appropriate authorities.

(d)   Staff should not follow students on social media and should take steps to prevent students from following them.

(e)   Staff must comply with the school image use policy, such as not including pupil surnames with pictures and ensuring parental permission has been given before posting a child's image.

n)   If anything occurs which concerns you or makes you feel uncomfortable, you must discuss this with a senior colleague as soon as possible, even if it turns out that nothing untoward has happened. You must make a written record, dated and signed, of any such incident. Guidance regarding low level concerns in your school's safeguarding policy should be followed.

o)   If an allegation is made against a member of staff, contractor or volunteer, the Group is committed to dealing with the allegation fairly, quickly and consistently, in a way that provides effective protection for the child and supports the person who is the subject of the allegation.

p)   Staff should familiarise themselves with information relevant to staff-student relationships in their school policies and procedures, such as:

(f)   Safeguarding Policy and Child Protection Policy and Procedures;

(g)   Behaviour and Discipline;

(h)   Physical Restraint;

(i)   Email and Internet Acceptable Use Policy;

(j)   Social Media Policy