



Safeguarding and Child Protection Policy

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Together, pursuing life in all its fullness

Template Version	Date	Author	Changes
V1	September 2023	Amy Bills – Deputy CEO	Initial Issue
V2	July 2024	Amy Bills, Louise Beale, Leah Baddeley	Updated for changes to KCSIE
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The electronic version is the definitive version of this document.

Safeguarding and Child Protection Policy – St Oswald’s CofE Academy

From September 2025

Links to:		
Trust Policies	Trust Guidance	Academy Policies
<ul style="list-style-type: none"> Staff Behaviour Policy (Code of Conduct) Safer Recruitment and Employment Policy Visitor and Visiting Speakers Policy Whistleblowing Policy 	<ul style="list-style-type: none"> Clubs and PTA Guidance Hiring and Letting T&C Premises booking form 	<ul style="list-style-type: none"> Behaviour Policy and/or Anti-Child on Child abuse and Bullying Policy SEND policy Acceptable Use Agreement and/or Equipment Loan Policy Home/Academy Agreement E-safety &/or online safety Policy Attendance Policy

Headteacher	Jayne Geran
Designated Safeguarding Lead (DSL)	Jayne Geran
Deputy DSL	Annvir Poonia, Jackie Evans
Nominated Safeguarding Academy Governance Committee member	Phyllis King
Chair of Governors	Phyllis King
Designated Teacher for Children in Care (and post CiC)	Annvir Poonia
MASH (Warwickshire Schools)	01926 414144
LADO (Warwickshire Schools)	01926 745376 or Lado@warwickshire.gov.uk
Emergency Duty Team (Warwickshire Schools)	01926 886922
Date shared with all staff	01.09.25

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1. Statement of Intent

Safeguarding arrangements in our academy are underpinned by two key principles:

- **Safeguarding is everyone's responsibility:** all Directors, staff, Academy Governance Committee members and volunteers must fulfil their full role in keeping children safe. We have 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 and operate in the best interests of the child.
- **A child-centred approach:** a clear understanding of the needs and views of children. We recognise the importance of enabling children to talk openly about anything that worries them and to feel confident that they will be listened to or access well publicised systems for reporting or disclosing abuse or harm.

At The Diocese of Coventry Multi Academy Trust (the Trust) we are committed to safeguarding children and young people, and we expect everyone who works within our trust to share this commitment. This policy sets out how we will deliver these responsibilities.

Definition

Safeguarding and promoting the welfare of children is defined in Keeping Children safe in Education 2025 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
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
(Working together to safeguard children December 2023)

This policy should be read in conjunction with 'Keeping Children Safe in Education (2025)', which is statutory guidance to be read and followed by academies and colleges, and alongside 'Working Together to Safeguard Children (2023)', a guide to inter-agency working to safeguard and promote the welfare of children. Attention should also be given to 'Meeting digital and technology standards in schools and colleges' and 'Keeping children safe in out-of-school settings: code of practice'.

These documents are available via the following links:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

<https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice>

https://assets.publishing.service.gov.uk/media/66bf300da44f1c4c23e5bd1b/Working_together_to_improve_school_attendance_-_August_2024.pdf

Furthermore, academy leaders will follow the procedures set out by the local safeguarding partnership:

The three main partners for the Coventry Safeguarding Children Partnership are: Coventry Local Authority, Coventry and Warwickshire Integrated Care Board and West Midlands Police force.

Online Safety

We understand that it is essential that children are safeguarded from harmful online content and wider online harms and take a whole school approach that protects, empowers and educates pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. *(Please see the Trust Online Safety policy for more information if applicable, available from the policies page of the academy or Trust website.)*

We ensure that pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum including:

- the DfE's 'Teaching online safety in school'
- Harmful online challenges and online hoaxes
- UKCIS 'Education for a connected world'
- the four areas of risk in Keeping Children Safe in Education:
 - content
 - contact
 - conduct
 - commerce

Academy leaders will work with parents to build an understanding of the shared responsibilities between parent's responsibilities to educate and support their child and of the academy's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations and the way in which we both filter and monitor online content on academy devices.

2. Legal Framework and Guidance

This policy has due regard to statutory legislation and relevant guidance including, but not limited to:

- The Education Act
- Keeping Children Safe in Education
- Working Together to Safeguard Children

- What to do if you are worried about a child
- Information sharing: Advice for practitioners
- Guidance for safer working practice for adults who work with children and young people in education settings
- 'Keeping children safe in out-of-school settings: code of practice'
- Human Rights Act
- Equality Act & Public Sector Equality Duty
- The Data Protection Act
- Serious Crime Act
- Teaching online safety in school
- 'Meeting digital and technology standards in schools and colleges'
- UKCIS Education for a connected world
- Prevent Duty
- Sexual Offences Act
- Preventing youth violence and gang involvement
- Criminal exploitation of children and vulnerable adults: county lines guidance
- Working together to improve school attendance

3. Scope of This Policy

This policy defines a 'child' as anyone under the age of 18 years or any learner of any age on the academy roll.

This policy applies to all employed Trust colleagues, including all permanent, temporary and support staff, Members, Directors, Academy Governance Committee members, volunteers, contractors and external service or activity providers. There is an additional policy to support visitors to the academy to ensure awareness and appropriate reporting of any safeguarding concern as well as a leaflet that is procedure for visitors as they enter the academy.

There are six key elements to our policy, which are described in the following sections:

- The types of abuse that are covered by the policy
- The signs of abuse that adults should look out for
- Specific roles and responsibilities for safeguarding (in addition to everyone's duty of care to safeguard children and adults)
- Procedure and processes that should be followed, include the support provided to children
- How the academy leaders will ensure that all staff and volunteers are appropriately trained, and checked for their suitability to work within the academy
- How the policy will be managed and have its delivery overseen

Through implementation of this policy academy leaders will ensure that our academy provides a safe environment for children to learn and develop

4. Safeguarding Roles and Responsibilities:

The Designated Safeguarding Lead (SLT member) is: **Jayne Geran**

The Deputy Designated Safeguarding Lead is: **Annvir Poonia, Jackie Evans**

Nominated Safeguarding Academy Governance Committee member: **Phyllis King (Chair of AGC)**

The Designated Teacher for Children in Care (and post CiC) is: **Annvir, Deputy Headteacher**

The overall statutory responsibility for ensuring that safeguarding is effective in this academy remains with the Headteacher and the Trust Board.

4.1 All Staff, Volunteers and Academy Governance Committee Members Have Responsibility for the Following:

- to provide a safe environment in which all children can learn
- identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm
- to take appropriate action, working with other services as needed
- to keep themselves updated with the systems within the academy which support safeguarding that were explained to them as part of their induction (including the staff Code of Conduct) which includes knowing the role, and working with, the academy's Designated Safeguarding Lead (DSL).
- to ensure they receive appropriate safeguarding and child protection training which is regularly updated

In addition to working with the designated safeguarding lead staff members should be aware that they may be asked to support social workers to take decisions about individual children.

4.2 All Staff are Responsible for:

- Knowing who the academy's designated safeguarding lead (DSL) is
- Raising any concerns with the designated safeguarding lead. If at any point there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anyone can make this referral if the DSL is unavailable
- Completing a formal written or electronic safeguarding concern form when making a referral. Staff should be clear that this should be done immediately, always on the same day
- Ensuring that their safeguarding and child protection training is up to date
- Being alert to the signs of abuse, exploitation and neglect
- Maintaining an attitude of 'it could happen here'
- Maintaining an attitude that every child's rights must be protected, and any form of prejudice contributes to a hostile learning environment and therefore must be challenged
- Maintaining an attitude that harmful sexual behaviour, sexual harassment/violence is never acceptable and will not be tolerated and being alert to inappropriate language and indicators of abuse and never rely on pupils to disclose abuse.
- When concerned about the welfare of a child, staff members will always act in the interests of the child
- Knowing the academy's procedures for dealing with children who are absent or go missing from education, particularly on repeat occasions, and reporting any such

concerns to the DSL. Academies must work with children's services where school absence indicates safeguarding concerns.

- Sharing information and working together to provide children and young people with the help they need when they need it
- Having an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Referring to the Headteacher any low-level concerns about another member of staff and any allegations of abuse directly to the Headteacher. If the concerns are about the Headteacher or Executive headteacher, these should be referred directly to the Trust Chief Executive Officer (CEO). If the CEO is unavailable staff should refer directly to the Trust DSL who will support with the referral to the Local Authority Designated Officer (LADO).
- Raising concerns about poor or unsafe practice and potential failures in the academy's safeguarding regime through the Trust Whistleblowing Policy
- Being aware of Warwickshire Safeguarding Board Procedures (<https://www.safeguardingwarwickshire.co.uk/>)
- Seeking early help where a child and family would benefit from coordinated support from more than one agency via Warwickshire (Family Connect)

4.3 The Trust Board are Responsible for:

- Approving the trust's safeguarding approach
- Appointing a lead trustee for safeguarding
- Providing strong governance to ensure safeguarding is effective
- Monitoring the implementation of safeguarding via the Education and Ethos Committee (EEC)

4.4 The People Team are Responsible for:

- Ensuring the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required; and ensuring volunteers are appropriately supervised
- Ensuring that the single central record (SCR) for academies is up to date and that this is checked regularly including DBS checks in line with safer recruitment and share this with the Headteacher of each academy
- Ensuring that the SCR for the Trust Board and Central Team is kept up to date and that DBS checks are undertaken
- Ensuring that Safer Recruitment practices are consistent and robust across all academies, including online searches for preferred candidates
- Ensuring that any Trust Wide HR policies are compliant, reviewed when necessary, kept up to date and disseminated effectively

Useful links

<https://www.gov.uk/guidance/check-a-teachers-record>

<https://www.gov.uk/government/collections/individuals-prohibited-from-managing-or-governing-schools>

https://ico.org.uk/media2/migrated/1064/the_employment_practices_code.pdf

4.5 Academy Governance Committee Members and the Trust Leaders are Responsible for:

- Ensuring that we are compliant with all requirements in KCSIE
- Ensuring that there is an effective Child Protection and Safeguarding Policy in place together with a Staff Behaviour Policy (Code of Conduct), which are provided to all staff, and ensuring all staff are given a mandatory induction, which includes familiarisation with child protection responsibilities and procedures to be followed if anyone has any concerns about a child's safety or welfare.
- Ensuring that policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Ensure that each Academy completes an annual audit which is used to inform future work of the Academy and Trust in respect of Safeguarding.
- Ensuring that we have a designated lead for child protection, and that they have access to appropriate training, which is updated every two years.

4.6 The Designated Safeguarding Lead is Responsible for:

- Managing referrals from staff or any others from outside the academy
- Working with external agencies and professionals on matters of safety and safeguarding
- Undertaking relevant training and attending update sessions
- Raising awareness of safeguarding and child protection amongst the staff and parents; and ensuring that child protection information is transferred to the pupil's new school/academy
- Ensuring all staff receive the appropriate annual training, and keep it up to date, in line with advice from Warwickshire LA
- Providing regular training and/or updates for all staff throughout the year
 - Leaders are strongly encouraged to use the resources provided by our Safeguarding partner, [Safeguarding Network](#). (A recommended programme of training, briefing and updates is included in Appendix 4)
- Ensuring that all policies and practices relating to attendance are compliant with [statutory guidance](#)

Children who are absent from Education

- Notifying the Children's Social Care department if there are concerns over unexplained absences of a pupil following the Child who are absent from education statutory guidance and local procedure:
 - A Children who are absent from Education (previously CME) referral form can be completed by a school after a maximum 10 days' absence through a secure email address: CME@coventry.gov.uk
 - If you have submitted a Children who are absent from Education referral form, please consult us before removing a pupil from the school register.
 - For urgent concerns about a child's safety or wellbeing, which requires immediate action, the school will make an immediate referral to Warwickshire County Council's Children Missing Education Team on 01926 736323 or via email cme@warwickshire.gov.uk
 - Visit www.warwickshire.gov.uk/childrenmissingeducation for information or to access the referral form

- Informing the Local Authority when a private fostering arrangement is in place
- Managing security within the academy and reviewing it regularly
- Ensuring that important safeguarding related policies are kept relevant and up to date
- Have an overview of the numbers of safeguarding and child protection referrals made from and share this with the Headteacher and AGC.
- Having in place effective ways to identify emerging problems and potential unmet needs for individual children and families
- Ensuring that the curriculum makes best use of Citizenship and PSHE, RSHE opportunities to cover safeguarding issues with children
- Ensuring at least one person on any appointment panel has undertaken safer recruitment training
- Ensuring procedures are in place to handle allegations against members of staff and volunteers (though the Headteacher will lead on this process)
- Ensure that organisations or individuals using school premises receive copies of 'Keeping children safe in out-of-school settings: code of practice' and that, as with any safeguarding allegation, our safeguarding policies and procedures, including informing the LADO, are followed if a concern/allegation is shared. The Academy will ensure that an annual meeting of the external providers using school premises takes place and that contact numbers and DSL details are shared so that they are informed of any safeguarding issues arising when using the premises whether or not children attending also attend the academy. Academy's will update external providers if this information changes or new providers use the school premises.
- Ensure that pupils who attend multiple settings or part time are kept safe when they are not on site for the whole school day, including by making checks that any alternative provision is a suitable and safe placement. (See appendix 2).
- Ensuring there are procedures in place to handle allegations against other children (Child-on-child abuse)
- Ensuring that there is support available for staff involved in difficult child protection cases/incidents both at the academy and externally through counselling and/or other services e.g. supervision.
- Engaging in external supervision, and maintaining the training needed to deliver to colleagues this if/when needed.
- Creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the academy's development
- Ensuring through the safeguarding curriculum that pupils know the process of raising a concern (about themselves or a friend/other), that they know the academy's Designated Safeguarding Lead (and deputy), and are aware of other support mechanisms such as ChildLine etc
- Promote and retain oversight of the educational achievement and wellbeing of children who are in care or have a social worker working alongside the designated teacher for children in care and the local authority virtual head.
- Making this policy available to parents and carers as appropriate
- Ensuring that colleagues are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role
- Ensuring all staff have regular reviews of their own practice to ensure they improve over time
- Ensuring all records are kept up to date and secure and kept separately from the main pupil file in a locked location

- Ensure that appropriate online filtering and monitoring systems are effective and communicated with all staff.
- Ensure that appropriate online filtering and monitoring systems are effective and communicated with parents/carers.
- Ensuring that parents/carers are regularly communicated with and receive signposts as to how best support the online safety of their child.

Keeping all child (safeguarding) records up to date and in line with the statutory requirements in KCSIE as a minimum:

All **safeguarding** concerns, discussions and decisions made, and the reasons for those decisions, must be recorded in writing. Information should be kept confidential and stored securely.

Records will include:

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

5. Safeguarding Process and Procedure

The academy leaders will deliver their responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures identified in the Warwickshire Safeguarding Partners policies and procedure guidance, available at:

<https://www.warwickshire.gov.uk/safeguardingreferral>

<https://api.warwickshire.gov.uk/documents/WCCC-1642278725-4997>

5.1 How to Report Any Concerns

Clear procedures on reporting any concerns are given to all staff and volunteers and visitors. This is done as part of the staff induction training or on a safeguarding leaflet as they sign in.

All concerns should be reported in writing, using the academy’s safeguarding concern form (whether online or paper based). Concern forms should always be completed as soon as possible, on the same day. Staff should never wait until the next day to complete a safeguarding concern form.

All child protection and or safeguarding concerns should be reported to *Jayne Geran* (Designated Safeguarding Lead) immediately. See Appendix 1 for a flow diagram which explains how all disclosures are dealt with at the academy.

We take our responsibility to safeguard young people seriously. Failure to follow these reporting procedures may result in disciplinary action.

5.2 Taking Action

If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to:

Warwickshire Emergency Duty Team on 01926 886922, or 999 if you are concerned a child needs immediate protection.

The designated safeguarding lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

NSPCC - When to call the police for designated safeguarding leads to understand when they should consider calling the police and what to expect when they do. It can be found here:

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

If the child has an injury that requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

5.3 Pupil Disclosure of Abuse, Neglect or Radicalisation

At *St Oswald's CofE Academy* we have a clear procedure for reporting concerns. If a pupil talks to a member of staff/volunteer about any risks to their safety or wellbeing, the staff member/volunteer will need to let the pupil know that they must pass the information on to the safeguarding team (DSL) in order to offer the proper support that the pupil requires.

Staff members/volunteers will allow them to speak freely and will not ask investigative questions.

The staff member/volunteer will tell the pupil what will happen next.

It is the duty of the member of staff/volunteers to inform the Designated Safeguarding Lead (DSL) of what has been discussed. The staff member/volunteer will write up details of the conversation with the pupil as soon as possible on *CPOMS* or the record of concern form (green form - signed, timed and dated) found in the staff room, SLT offices and the front office and deliver it to the Designated Safeguarding Lead.

Staff should **not** wait until the following academy day to report a concern. Information will be shared on a need-to-know basis only.

Issues or concerns will **not** be discussed with colleagues, friends or family unless necessary for the welfare of the child.

5.4 Suspecting that a Pupil is at Risk of Harm

There will be occasions when staff/volunteers may suspect that a pupil may be at risk but have no 'real' evidence. In these circumstances, staff will try to give the pupil the opportunity to talk.

Colleagues will recognise that pupils may not feel ready to disclose their abuse, exploitation or neglect, or may not recognise it as such. They may feel humiliated or actively being threatened. They may face additional barriers to disclosing such as additional needs, sexual orientation, vulnerabilities or language barriers. Therefore, it is imperative that all colleagues exercise professional curiosity and report their concerns to the DSL.

Staff should use the **concern form/CPOMS referral** to record these early concerns. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead *Jayne Geran*.

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the academy's **Behaviour Policy and Anti-Bullying Policy** where necessary (*located on the policies page of the Academy website*) However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. We acknowledge that some children can be particularly vulnerable or may have an increased risk of abuse, and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our pupils receive equal protection, we will give special consideration to children that are considered to be vulnerable.

5.5 Notifying Parents

The academy leaders will normally seek to discuss any concerns about a pupil with their parents. The Designated Safeguarding Lead *Jayne Geran or deputy* will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the academy believes that notifying parents could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sought from Children's Social Care.

Police and Criminal Evidence Act (1984) – Code C

The Headteacher, Designated Safeguarding Lead (DSL) and deputy (DDSL) are aware of the requirement for children to have an appropriate adult when in contact with Police officers.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for these purposes.

PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

If a police officer arrives at the academy wishing to speak with a pupil, the receptionist will inform the Headteacher and the DSL and follow the Trust **Visitor and Visiting Speaker's policy**. The DSL will ensure that arrangements are made to inform parents that this is the case and seek their presence at the academy as the appropriate adult. If for any reason the parent cannot attend to be an appropriate adult the DSL or Headteacher will ensure that an appropriate adult is provided from the academy leadership team.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If having been informed of the vulnerabilities, the DSL (or deputy) does not feel that the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate their concerns immediately.

A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence², or asked further questions if the answers they provide the

¹ The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

² A person need not be cautioned if questions are for other necessary purposes, e.g. (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective

grounds for suspicion, or when put to them the suspect's answers or silence, (i.e., failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a child or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult¹ means, in the case of a child:

- the parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
- a social worker of a local authority

failing these, some other responsible adult aged 18 or over who is not:

- a police officer;
- employed by the police;
- under the direction or control of the chief officer of a police force; or
- a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

5.6 Referral to Children's Social Care

The Designated Safeguarding Lead will make a referral to Children's Social Care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (*subject to their age and understanding*) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Social care assessment will consider where children are being harmed in contexts outside of the home (extra familial harm) so we will ensure that we provide as much information as possible as part of the referral process. This will allow any assessments to consider all the available evidence and enable a contextual approach to address harm.

The referral will be made in line with local authority and procedures and thresholds. The threshold document and escalation procedures produced by the local safeguarding partners can be found here:

<https://www.warwickshire.gov.uk/safeguardingreferral>

<https://api.warwickshire.gov.uk/documents/WCCC-1642278725-4997>

5.7 Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by

conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

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

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. If a member of staff becomes aware of an arrangement such as this, they should report via CPOMS to ensure that the DSL is fully aware of the situation for that child.

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

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

Academy staff will notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The academy itself has a duty to inform the local authority of the private fostering arrangements.

In addition, on admission to St Oswald's CofE Academy we will take steps to verify the relationship of the adults to the child who is being registered.

5.8 Reporting Directly to Child Protection Agencies

Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police or the NSPCC if:

- the situation is an emergency and the Designated Safeguarding Lead *Jayne Geran* their deputy *Annvir Poonia* the Headteacher or their deputy are all unavailable
- they believe that a direct report is the only way to ensure the pupil's safety.

5.9 Early Help

Everyone who comes into contact with children and their families and carers have a role to play in safeguarding children. We are committed to working closely with our neighbouring Early Help family hub to work with families in the community to improve outcomes for children.

Claremont Children and Family Centre
Claremont Road, Rugby, CV21 3LU

We also liaise with a wide variety of outside agencies, many of which are able to see pupils weekly. Examples of the *wider* agencies we liaise with include: multi-agency team/s, careers

services, academy nurse (Connect for Health), Child and Adolescent Mental Health Services (CAMHs), Warwickshire Attendance Service (WAS), our local Police Community Support Officers (PCSOs), the Police, Family Information Service (FIS), <https://www.hillmortonprimaryschool.com/education-engagement-advocates-eeas/MIND>, Specialist Teaching Service (STS), Education Engagement Advocate (EEA), Rugby Early Help and Targeted Support Team and other services.

We encourage families, pupils and parents to work with these partner agencies also. The provision of early help services should form part of a continuum of help and support to respond to the different levels of need of individual children and families.

Staff and volunteers should be alert to the potential need for early help that might support a pupil early on with their particular safeguarding issue with a view to preventing it from becoming a bigger issue longer term.

DSLs will consider following the procedures (depending on individual need) identified for initiating early help for a child who:

- is disabled
- has special educational needs (whether or not they have a statutory education, health and care (EHC) plan)
- is a young carer
- is bereaved
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing/goes missing from care or from home⁵²
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse⁵⁴
- is misusing drugs or alcohol themselves
- is suffering from mental ill health
- has returned home to their family from care
- is a privately fostered child
- has a parent or carer in custody
- is absent from education, unexplainable and or persistent , or not in receipt of fulltime education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded.

All initial contacts where staff, Academy Governance Committee members or volunteers wish to make a request for general advice, information or a service for a child who may be a child with additional or complex needs should be made either by contacting *Jayne Geran*, *Annvir Poonia* or *Jackie Evans* or by contacting the local MASH.

The local MASH for the academy is:

Family Connect Telephone number: 01926 414144

Out of hours Emergency Duty Team: 01926 886922

Family Connect Education Lead: 01926 418608

Prevent/Channel Referrals: Refer to Family Connect (triagehub@warwickshire.gov.uk) and to CTU_GATEWAY@west-midlands.pnn.police.uk

The Designated Safeguarding Lead (*Jayne Geran*) should be advised of any such contacts to ensure that all information is shared.

6. Types of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. The abuse might be from an adult or adults, or another child or children.

Our most significant local safeguarding concerns are:

	Localised Safeguarding Concerns	Our strategic academy response – what we do to prevent or reduce harm and respond to harm if it occurs.
1	Bullying	Anti-bullying policy and behaviour policy procedures to be followed by all staff. Community PC link who supports training and awareness for areas of concern. Works with the academy to provide presentations on awareness for relevant year groups. Anti-bullying workshops for relevant year groups. PSHE lessons, assemblies to inform and promote prevention.
2	Social media dangers: Pupils having access to social media / inappropriate online content via mobile phones / tablets. Lack of parent/carer understanding of how to monitor this	The academy to follow the established safeguarding response if any issues around this area. Letters to parents of specific year groups where issues may have arisen. Community PC workshop for specific year groups. PSHE lessons, assemblies to inform and promote prevention. Sign posting parents to on-line support
3	Domestic Violence	Operation Encompass – DSLs informed and can make suitable follow up in academy to support pupil. If pupil discloses, or staff vigilance leads to concerns, then academy safeguarding response will happen.
4	Significant proportion of low income families	Pupil premium offer, including provision of free uniform Pre-loved uniform available Food Bank Partnership & partnership with Family Information Service and Children’s Centre Universal & Early Support offer

5	Persistent absence	On-going work with Warwickshire Attendance Service (WAS) Attendance Policy Support from Warwickshire Attendance incentives Regular parent communication On-going input & outreach by academy's Attendance & Welfare Officer
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There are four types of child abuse as defined in 'Keeping Children Safe in Education' as follows:

6.1 Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

The physical signs of abuse may include:

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises- in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks
- multiple burns with a clearly demarcated edge

Most children will collect cuts, bruises and injuries and these should always be interpreted in the context of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g., elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g., cheeks, abdomen, back and buttocks.

A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

Changes in behaviour that can also indicate physical abuse:

- increasingly withdrawn behaviours
- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- running away from home
- reluctance to get changed, for example in hot weather
- depression

6.2 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

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

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow. However, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may also 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 also be imposing inappropriate expectations (for age or development stage) being imposed on a child. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

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

It may involve serious bullying (including cyber-bullying) or the exploitation or corruption of children.

Changes in behaviour which can indicate emotional abuse include:

- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress
- neurotic behaviour e.g., sulking, hair twisting, rocking

6.3 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It can be difficult to recognise neglect. However, its effects can be long term and damaging for children.

It may include a failure 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)
- ensure access to appropriate medical care or treatment
- respond to a child's basic emotional needs

The physical signs of neglect may include (but not limited to):

- Being constantly dirty or 'smelly'
- constant hunger, sometimes stealing food from other children
- losing weight, or being constantly underweight
- inappropriate or dirty clothing

Neglect may be indicated by changes in behaviour which may include:

- mentioning being left alone or unsupervised
- not having many friends
- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments

6.4 Sexual Abuse

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) regardless of whether the child is aware of what is happening.

The activities may involve physical contact or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Physical signs of sexual abuse may include:

- pregnancy
- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down

Changes in behaviour which can also indicate sexual abuse include:

- sexual knowledge which is beyond their age (or developmental level) or sexual drawings/language
- saying that they have secrets that they cannot tell anyone about
- sudden or unexplained changes in behaviour e.g., becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- substance or drug abuse

- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults
- Sexual abuse is not solely perpetrated by adult males. Women also commit acts of sexual abuse, as can other children (child-on-child abuse).

6.5 Child-on-Child Abuse

Please refer to the academy Behaviour Policy and Anti-Bullying Policy for details on how we prevent and reduce and report harms and how we respond to them when they occur. The Behaviour Policy and/or Anti-Child on Child abuse and Bullying Policy includes information about our whole school approach to child-on-child abuse, bullying, harmful sexual behaviour (including sexual harassment and sexual violence) and bringing weapons into school.

Staff are aware that safeguarding issues can manifest themselves via child-on-child abuse. Staff are 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 and that they must challenge inappropriate behaviour between peers that may be abuse in nature.

All staff, but especially the designated safeguarding lead (and deputies) 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.

We believe that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up” or “having a laugh” or “boys being boys”. Different gender issues can be prevalent when dealing with child-on-child abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

This is most likely to include but is not limited to;

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced/involved sexual imagery)
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

We prevent child-on-child abuse by actively seeking to raise awareness of all forms of child-on-child abuse and by educating Academy Governance Committee members, our senior leadership team, staff, pupils, and parents about this issue.

This includes training Academy Governance Committee members, the senior leadership team, and staff on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify, and respond to it. Please refer to the academy Behaviour Policy and/or Anti-Child on Child abuse and Bullying Policy for fuller details.

6.6 Bullying

Bullying is also abusive and will include at least one, if not two (or all) of the defined categories of abuse. Refer to academy's specific Behaviour Policy and/or Anti-Child on Child abuse and Bullying Policy if applicable.

For more information from the DfE on preventing and tackling bullying and cyber bullying please go to: <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

6.7 Sexual Violence and Sexual Harassment/Harmful Sexual Behaviour (HSB)

Child-on-child Abuse, **sexual harassment** and **sexual violence** are **never acceptable and will not be tolerated**. All staff understand, that even if there are no disclosures in the academy, it does not mean it is not happening, it may be the case that it is just not being reported. As such all colleagues are trained to notice and identify signs and indicators of child-on-child abuse and where they have any concerns regarding child-on-child abuse how to report these to the DSL or deputy through formal safeguarding systems.

Furthermore, any disclosures made by pupils will be believed and responded to in line with the academy Behaviour Policy and/or Anti-Child on Child abuse and Bullying Policy and pupils will be kept safe and never made to feel that they are creating a problem by reporting the abuse, sexual violence or sexual harassment. Incidents will be assessed and responded to on a case-by-case basis taking into account harm, immediate safety, pupil wishes and seeking advice and making referrals as required.

We will follow and adhere to Part 5 of KCSIE (statutory guidance):

<https://www.gov.uk/government/publications/keeping-children-safe-in-education—2>

It covers:

- how we prevent child-on-child abuse
- what sexual violence and harassment is
- schools' and colleges' legal responsibilities
- a whole school or college approach to safeguarding and child protection
- how to respond to reports of sexual violence and sexual harassment

The departmental advice, when referring to **sexual violence** refers to sexual offences as described under the Sexual Offences Act 2003.

This includes:

- rape
- assault by penetration
- sexual assault

The advice sets out that **sexual harassment** is ‘unwanted conduct of a sexual nature’ that can occur online and offline. It is likely to violate a child’s dignity, and/or makes them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment.

We believe that all children have a right to learn in a safe environment.

Academy leaders will minimise the risk of child-on-child abuse by:

- Engage with the local safeguarding partners in both the prevention and response to child-on-child abuse.
- Collecting and responding to pupil voice and listening to the wishes of the pupil that has been harmed in every incident.
- Teaching pupils about the law and ensuring that they understand that it is there to protect rather than criminalise them.
- Raising awareness of the risks and never normalising these behaviours
- Ensuring that all staff are trained to identify indicators to abuse, the barriers to disclosure and the impact of societal norms on pupils’ behaviours and subconscious bias
- Ensuring that pupils are taught about forms of abuse and the impact of societal norms and biases and how to report concerns
- Ensuring that all policies and procedures are clear and well known
- Completing a preventative risk assessment that considers contextual harms
- Not tolerating any form of prejudice and ensuring that every incident of HSB is addressed both proportionately and in line with guidance and by publishing these processes
- Ensuring that all children (especially those who identify as LGBTQ) have a trusted/safe adult with whom they feel they can be open with and share their concerns.

Access to check-ins with a trusted adult; risk assessments put in place as necessary; access to the ‘Speak Out. Stay Safe’ (NSPCC) programme and PSHE lessons; opportunities to discuss topics linked to equality, diversity, inclusion and anti-bullying in Worship sessions and PSHE lessons; opportunities to share their views in a variety of ways with trusted adults, including with the use of visuals and alternative ways of communicating and recording are some of the means in place to reduce risk.

We recognise that some pupils may sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the academy Behaviour Policy.

Occasionally, allegations of a safeguarding nature may be made against pupils by others in the academy. Where this is the case an appropriate risk assessment and referrals will be undertaken to establish next steps to deal with the allegation.

The child-on-child risk assessment will include as a minimum:

- If a relationship has previously existed in any format; is there an imbalance of power within their relationships?
- is the allegation of a serious nature?

- If the allegation includes a criminal offence, has the referral to the police and child service been made?
- Does this allegation raise risk factors for other pupils in the academy?
- Does the allegation indicate that other pupils may have been/could be affected by this pupil?
- Does the allegation indicate that young people outside the academy may be affected by this pupil (familial harms)?
- Does this allegation indicate that the contextual safeguarding within the academy environments should be reviewed?
- What support does this allegation indicate are needed for both the victim and alleged perpetrator of the child-on-child abuse?

Academy leaders will support the victims and perpetrators and alleged perpetrators of child-on-child abuse by adhering to Part 5 of KCSIE, ensuring that all steps are included in procedures.

Organisations that support pupils with Sexual Violence or Sexual Harassment:
victimsupport.org.uk

NSPCC Harmful Sexual Behaviour Framework Audit Tool:
<https://www.nspcc.org.uk/globalassets/documents/publications/harmful-sexual-behaviour-framework-audit-tool.pdf>

All staff and volunteers must be aware that adults or children, who use children to meet their own sexual needs abuse both girls and boys of all ages. In all cases, children who tell someone about sexual abuse do so because they want it to stop. It is important, therefore, that children are always listened to, reassured, and taken seriously and (as in all cases of abuse or neglect) that our reporting system is followed systematically without fail.

6.8 Sharing of consensual or non consensual nude and semi nude images or videos

We will adhere to the guidance issued by the UK Council for Child Internet Safety
<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves (or others) or sends sexually explicit messages. They can be sent, received or forwarded using any device that allows you to share media and messages.

Sexting may also be called:

- trading nudes
- dirties
- pic for pic
- pics.

There are many reasons why a young person may want to send a naked or semi-naked picture, video or message to someone else.

- joining in because they think that 'everyone is doing it'
- boosting their self-esteem
- flirting with others and testing their sexual identity

- exploring their sexual feelings
- to get attention and connect with new people on social media
- they may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent
- exploitation or blackmail

There is also the potential of children using Artificial intelligence as a source.

Loss of control of images

It is easy to send a photo or message, but the sender has no control about how it's passed on.

When images are stored or shared online, they become public. Some people may think that images and videos only last a few seconds on social media and then they're deleted (such as snapchat) but they can still be saved or copied by others.

Images used on social media are also owned in many cases by the media that the child has used, for example anything in the Apple cloud is owned by Apple and anything posted on Facebook is owned by Facebook and will remain within their storage area. These storage areas are open to hacking and frequently are. This means that photos or videos which a young person may have shared privately could still end up being shared between adults they don't know.

However due to awareness campaigns many young people are aware of the permanence of online images and as a consequence to this rather than external risks need support and guidance in reducing the visibility of the image by contacting external agencies, support with parents and mental health and wellbeing provision.

Some sources of support for wellbeing and mental health that we recommend include:

Some sources of support for wellbeing and mental health that we recommend include: Child and Adolescent Mental Health Services (CAMHs), Family Information Service (FIS), MIND, Rugby Early Support and Targeted Support Team.

<https://www.warwickshire.gov.uk/mental-health-wellbeing/emotional-wellbeing-mental-health-support-young-people>

Associated risks of sexting, nudes, pics include:

Blackmail

An offender may threaten to share the pictures with the child's family and friends unless the child sends money or more images.

Unwanted attention

Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images and pose an even greater personal risk to the young person.

Bullying

If images are shared with their peers or in school, the child will be humiliated and may be [bullied](#).

Emotional distress

Children can feel embarrassed and humiliated. If they're very distressed this could lead to suicide or [self-harm](#).

Prevention:

All staff will be trained in online-safety (Refer to academy E-Safety policy for more information) and will have a role in preventing young people from sexting/nudes.

All staff will be available and approachable for pupils to make disclosures about sexting which will then be referred to the DSL for further investigation.

Every child is different, so our approach will be based on their exact situation.

We will seek to prevent young people sexting through educating them about the laws and potential consequences of sexting.

This may be addressed through: This may be addressed through: E-safety weeks each half term where pupils are taught specifically about E-safety, all children are reminded continuously about e-safety messages. School uses the 'Zip It, Block It, Flag It' slogan. Visits from the local PC and other outside agencies to specific classes also occur during the year. School has an E-Safety Song which has begun to be learned. Concerns about appropriate use of apps/websites/games at home are shared with parents via newsletters and Class Dojo. PSHE sessions also support. Assemblies led by teachers and SLT regarding E-safety occur. NSPCC assemblies and follow up workshops are planned.

We will:

- Outline our expectations and explain the rules of having a mobile phone tablet or smartphone
- Ask pupils what they feel is acceptable to send to other people then discuss appropriate images and the dangers of inappropriate images (listed above)
- Make sure pupils are comfortable saying no, that they know their body is private and being asked to share explicit images is inappropriate and illegal. Talk about whether a person who asks for an image from you might also be asking other people for images.
- Explain to pupils about the importance of trust and consent in a healthy relationship (Refer to the academy's Sex and Relationships Education policy)
- Tell pupils that it's not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they're unhappy about.
- Tell pupils what can happen if things go wrong through real life examples such as television programs or news stories as far as possible, but also make clear that there is help and support to remove images and 'get through' any situation they or their peers find themselves in and encourage them to seek support from us.
- Ask pupils about the 'Granny rule' would you want your Granny to see the image you're sharing?
- Discuss the impact of revenge sexting after relationships have broken down or a friend has done something as a joke and lost control of the image etc.
- Provide details of support and coping strategies if the young person finds themselves in an uncomfortable position such as the Zipit App to control the conversation with funny images to prevent further request for pictures or ChildLine if the situation has got out of control.
- Let pupils know that they can speak to us if this ever happens and that disclosures will be treated confidentially and without embarrassment and support will be given.
- Train staff to react calmly and listen to the concerns of the child and explain that they must share the information confidentially with the DSL.

- Strongly encourage the use of the Safer Schools app for all staff, parents and – where appropriate – pupils.

When a child has been affected by sexting we will:

- Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious and there may be additional barriers due to perceived 'guilt'
- Recognise that they themselves may feel shocked, upset, angry, confused or disappointed while listening to the child, but that it is inappropriate to show this in any way
- Give themselves time to process the information, remembering that the child will be watching their reactions
- Reassure the child that they aren't alone
- Listen and offer support – they're probably upset and need help and advice, never criticism or comments such as 'I told you not to do that'
- Not ask questions like "why have you done it" as this may stop them from opening up
- Discuss the problem and the wider pressures that they may face, to help them to understand what's happened and understand any wider safeguarding concerns
- Assure the child that they'll do all they can to help and explain that they will seek the support of the DSL
- Remind them that they can always talk to Childline or another trusted adult if they aren't comfortable talking directly to the staff member

If a child has shared an explicit image, we will:

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else.
- Support the pupil to ask the social media site to remove the image and get in touch with [Childline](#). Together, Childline and the Internet Watch Foundation (IWF) will try to get the image removed.
- Alternatively, if it is in the best interests of the pupil, we will make a report direct to the [Internet Watch Foundation](#) (IWF). Childline is a confidential service, but to make a report on a child's behalf to the IWF we need to confirm who the child is and their date of birth.
- Staff need to provide Childline or IWF with a link to the image which may require the police (because staff should not look at the image) to be involved (assess this against the 'aggravating factors'). After the link is sent staff will not keep a copy of the image for evidence as it's illegal to share or store child abuse images.
- Discuss wider safeguarding concerns and agree who will be contacted and when they will contact parents/police/CEOP/ as appropriate to the case.
- Contact the [Child Exploitation and Online Protection Centre](#) (CEOP) as well as the police if the image was requested by an adult, as this is [grooming](#) which is illegal.
- If the image was requested by a school aged pupil not from this academy, we will contact the DSL at that school to raise awareness of potential wider safeguarding issues or circulation of the image in their school.

We will encourage the child to:

- Delete images from their social media accounts if they've have uploaded the image themselves

- If they're sharing an image which somebody else uploaded, consider asking that person to delete it
- If the image or video was shared over the web, don't comment on it or share it as this may mean the image is seen more widely

If a child has been sent a sexually explicit image:

- Staff will ask them if they know the person who sent it and their age
- If the image was sent by another young person, staff may want to help the child to speak to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media;
- Staff should look at [Net Aware](#) for information and advice about this or contact the O2 and NSPCC online safety helpline on [0800 800 5002](tel:08008005002);
- If the image was sent by an adult, staff should contact [CEOP](#), the Child Exploitation and Online Protection Centre, as this may be part of the [grooming](#) process.

A young person is breaking the law if they:

- Take an explicit photo or video of themselves or a friend. We will follow the guidance on aggravating factors and when to report to the police. In most cases of consensual sharing of images, the police will not need to be notified. Where there is an aggravating factor that includes a form of abuse – incidents will be reported to the police.
- Share an explicit image or video of a child, even if it's shared between children of the same age
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created
- As of January 2016, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest.
- Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they're a risk.

6.9 'Upskirting'

The Voyeurism (Offences) Act, 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 gender, can be a victim.

Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlines within this policy and where appropriate staff will also consult the academy Behaviour Policy and/or Anti-Child on Child abuse and Bullying Policy.

Signposts for support or advice:

- CEOP's [Thinkuknow](#) give advice for parents, as well as children and young people of different ages, on staying safe online. Thinkuknow have created [short videos](#) to help parents understand why children 'sext', how to talk to them about it and what to do if their child is affected.

- [Internetmatters.org](https://www.internetmatters.org) work to help parents keep their children safe online. They provide free advice on online issues affecting children, including [sexting](#) and [grooming](#).
- [The UK Safer Internet Centre](#) gives advice and resources for parents and professionals on online safety. Their website has links to games and quizzes for [primary](#) and [secondary](#) aged children that encourages them to be safe online.
- **O2 and NSPCC** Help Line: [0808 8005002](tel:08088005002)
- **Zipit app**: This app provides children with alternative images to send in response to a request for explicit images.

6.10 Child Criminal Exploitation (CCE) and Exploitation of Vulnerable Adults (County Lines & Serious Violence)

Both Child Sexual Exploitation (CSE- see 6.11) and CCE 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. 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.

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.

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. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however colleagues 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 (CSE- see 6.11).

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.

County lines is the police term for urban gangs supplying drugs to suburban areas/market or coastal towns using dedicated mobile phone lines or “deal lines”.

It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations.

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

Signs to look out for:

- Going missing from school or home and / or being found out-of-area (though criminal gangs are becoming 'wise' to this method of identifying children that have been exploited and are moving to exploit children in the local area to avoid notice)
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

Where staff or volunteers have a concern around county lines they should inform their DSL immediately who will follow the local authority safeguarding procedures. Where there is a risk of imminent harm an immediate referral to the police should be made.

Regardless of gender or the role that they have been made to undertake any child or adult who has experienced criminal exploitation is likely to have experienced or been threatened with serious violence to themselves or their family or community.

Serious violence indicators include:

- increased absence from school
- a significant decline in performance
- changes in friendships or relationships with older individuals or groups
- indicators of self-harm
- a significant change in well-being or signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by or involved with individuals associated with criminal networks or gangs

Staff training will include these signs and indicators in line with the Home Office guidance 'Preventing youth violence and gang involvement' and 'Criminal exploitation of children and vulnerable adults: county lines guidance and contextual safeguarding.

Colleagues are also trained on the additional risk factors associated with 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.

Preventing youth violence and gang involvement:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

County Lines:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountryLinesGuidanceSept2018.pdf

County Lines and Criminal Exploitation Toolkit:

<https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit>

Contextual Safeguarding Network:

<https://www.contextualsafeguarding.org.uk/>

6.11 Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, 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. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. There is always an imbalance of power in the relationship. It is a form of sexual abuse. It is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex.

We are also aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such which can be an additional barrier to disclosure. Colleagues receive training and updates on CSE to ensure awareness of and mitigate these additional difficulties to ensure children receiving appropriate intervention and support at the earliest opportunity.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

The perpetrator holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex or sexual bullying including cyberbullying and grooming.

CSE can take different forms, most commonly: ***'Inappropriate Relationship - Scenario A'*** Usually involves just one abuser who has inappropriate power which might be physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

‘Inappropriate relationship – Scenario B’ Abuser grooms the victim by striking up a relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims might be required to attend ‘parties’ and engage in sexual activity with multiple people and are threatened with violence (directly or against family members) if they try to seek help.

‘Organised exploitation and trafficking’

Victims are trafficked through criminal networks, often between towns and cities and are forced or coerced into sex with multiple people. They may also be used to recruit new victims - where this is the case, it is important that the child perpetrator is also recognised as a victim. This serious organised activity can involve the buying and selling of young people.

For more information on CSE and a guide for practitioners please go to:

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Key indicators of children being sexually exploited may include:

- receiving unexplained gift or gifts from unknown sources
- associating with other young people involved in exploitation
- going missing for periods of time or regularly coming home late (please refer to the academy attendance policy)
- regularly missing education or not taking part
- displaying inappropriate sexualised behaviour
- having multiple phones
- mood swings or changes in emotional wellbeing
- being seen at strange meeting places (hotels or known places of concern)
- having older boyfriends / girlfriends (where the age difference might create an imbalance of power)
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.
- self-harming / drug or alcohol misuse
- injuries (physical).

Academy safeguarding procedures for reporting any concerns apply and all concerns must be recorded and reported as soon as is reasonably possible and certainly that day.

Following a referral to Children’s Social Care, a Multi-Agency Child Exploitation (MACE) meeting may be convened under Warwickshire Safeguarding inter-agency safeguarding procedures.

6.12 Honour Based Abuse (HBA)

So-called ‘honour-based’ abuse (HBA) encompasses incidents or 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.

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in

relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action should take once the concern has been shared with the Designated Safeguarding Lead (DSL) or deputy (DDSL).

All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL (or deputy).

6.12.1 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- a low level of integration into UK society
- having a mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin (where FGM is known to be prevalent)
- being taken on a long holiday to the country of origin (where FGM is known to be prevalent)
- talk about a 'special' procedure to become a woman

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from academy especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
- talking about pain or discomfort between her legs.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Under no circumstances should staff physically examine pupils.

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out and discuss any such cases with the Designated Safeguarding Lead (DSL) who will refer to children's social care. *The duty to report to the police does not apply in relation to at risk or suspected cases though staff will always refer to the DSL to take the next appropriate steps.*

For further advice from the Home Office on FGM please go to:
<https://www.gov.uk/government/collections/female-genital-mutilation>

For the multi-agency statutory guidance please go to:
<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

The following is a useful summary of the FGM mandatory reporting duty from the Home Office:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

6.12.2 Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. A marriage must be entered into with the free and full consent of both parties, there must be a choice.

Forced marriage is recognised as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). In some cases people may be taken abroad without knowing that they are to be married. When they arrive in that country, their passport(s)/travel documents may be taken to try to stop them from returning to the UK.

An *arranged* marriage is not the same as a forced marriage. In an arranged marriage, the families take a leading role in choosing the marriage partner, but both parties are free to choose whether to enter into the marriage or not.

Forced marriage is an abuse of human rights, a form of violence against men and women. It is child abuse when it affects children and abuse of vulnerable people when it affects those with disabilities. Where staff or volunteers have a reason to suspect that someone is experiencing pressure or being forced into marriage, they must report this to the DSL through the academy process.

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

For more statutory information on forced marriage:
<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible>

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.

6.12.3 Breast Ironing/Flattening

Breast ironing or flattening is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of known cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware.

Why does breast ironing happen?

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. It is seen by the perpetrator as a protective measure for the child.

Breast ironing is physical abuse

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

Breast Ironing in the UK

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1,000 girls at risk. Keeping Children Safe in Education mentions breast ironing as part of the section on So-called 'Honour' Based Abuse'.

Staff or volunteers worried about the risk of breast ironing in the academy should refer through the appropriate channels to the Designated Safeguarding Lead as soon as possible who will make a referral to children's services. If staff or volunteers are concerned that the girl is in immediate danger, contact the police by calling 999.

The DSL will also contact the Foreign and Commonwealth Office if the girl has been taken abroad:

- telephone: 020 7008 1500
- from overseas: +44 (0)20 7008 1500

For more information on breast ironing or flattening go to:

<http://nationalfgmcentre.org.uk/breast-flattening/>

6.13 Domestic Abuse and Young People

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those

aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional. All children who witness domestic abuse can be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. 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.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are categorised as victims of domestic abuse and children fleeing an area where domestic abuse has occurred should be given priority placements in schools through fair access arrangements.

We encourage pupils to come forward by raising awareness of the issue and teaching pupils about health relationships through SRE, the wider curriculum and modelling behaviour in the academy and ensure that staff are trained to report any concerns that they identify.

Adolescent to Parent Violent Abuse

APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach. For more information on APVA go to:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/420963/APVA.pdf

What to look out for when a child is witnessing domestic abuse:

The emotional responses of children who witness domestic violence may include fear, guilt, shame, sleep disturbances, sadness, depression, and anger (at both the abuser for the abuse and at the victim for being unable to prevent the abuse).

Physical responses may include stomach aches and/or headaches, bedwetting, and loss of ability to concentrate. Some children may also experience physical or sexual abuse or neglect. Others may be injured while trying to intervene on behalf of the victim or a sibling.

The behavioural responses of children who witness domestic violence may include acting out, withdrawal, or anxiousness to please. The children may exhibit signs of anxiety and have a short attention span which may result in poor academic performance and attendance. They may experience developmental delays in speech, motor or cognitive skills. They may also use violence to express themselves displaying increased aggression with peers or family. They can become self-injuring.

If a child discloses that they have witnessed domestic abuse, or an adult linked to a child in your academy discloses that they are being abused staff and volunteers are directed to follow St Oswald's CofE Academy safeguarding procedures and report your concern to the DSL.

For more information on Domestic Abuse go to:

<https://www.gov.uk/guidance/domestic-violence-and-abuse#history>

6.14 Preventing Radicalisation

Children may be susceptible 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 a schools or colleges 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 right 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)

Behaviour that could constitute extremism:

Aim 1 (negate or destroy fundamental rights and freedoms): Behaviour against a group, or members of it, that seeks to negate or destroy their rights to live equally under the law and free of fear, threat, violence, and discrimination. Including:

- Using, threatening, inciting, justifying, glorifying or excusing violence towards a group in order to dissuade them from using their legally defined rights and freedoms.

Aim 2 (undermine, overturn or replace liberal democracy): Attempts to undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights. Including:

- Advocating that the UK's parliamentary democracy and democratic values and rights are not compatible with their ideology, and seeking to challenge, overthrow, or change our political system outside of lawful means.
- Using, threatening, inciting, justifying, glorifying or excusing violence towards citizens, in order to dissuade them from participating freely in the democratic process.
- Subverting the way public or state institutions exercise their powers, in order to further ideological goals, for example through entryism, or by misusing powers or encouraging others to do so.
- Using, threatening, inciting, justifying, glorifying or excusing violence towards public officials including our armed forces, police forces and members of local, devolved or national legislatures, in order to dissuade them from conducting their obligations freely and fearlessly, without external interference.
- Establishing parallel governance structures which, whether or not they have formal legal underpinning, seek to supersede the lawful powers of existing institutions of state.

Aim 3 (enabling the spread of extremism): Intentionally creating a permissive environment for behaviour in aim 1 or aim 2. Including:

- Providing an uncritical platform for individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2.
- Facilitating activity of individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2, including through provision of endorsement, funding, or other forms of support.
- The dissemination of extremist propaganda and narratives that call for behaviour in either aim 1 or aim 2.

- Attempts to radicalise, indoctrinate and recruit others to an ideology based on violence, hatred or intolerance, including young people.
- Consistent association with individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2 without providing critical challenge to their ideology or behaviour.
- If any behaviour listed in aim 1 or aim 2 has occurred previously, a refusal by the individual, group or organisation that conducted the behaviour to rescind, repudiate or distance themselves from the behaviour.

The examples of behaviour above are indicative and not exhaustive.

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.

The Counter-Terrorism and Security Act, places a duty on specified authorities, including local authorities and childcare, education and other children’s services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism “the Prevent Duty”.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised they should discuss this with the Designated Safeguarding Lead (DSL).

The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

Channel

We understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Channel guidance is available at: <https://www.gov.uk/government/publications/channel-guidance>

We use the safeguarding through the curriculum to ensure that children and young people understand how people with extreme views share these (including online) to radicalise others.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching our core values alongside the Fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside academy
- evidence of possessing illegal or extremist literature

- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti or artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

For the revised Prevent Duty Guidance please go to:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

For further Guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism from the Home Office please go to:

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The Government's 'Educate Against Hate' provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

<https://educateagainsthate.com/>

More information accessible can be found here: [Get help if you're worried about someone being radicalised - GOV.UK \(www.gov.uk\)](#)

6.15 Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. In addition, Trust professionals 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.

We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. We will ensure that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

We seek to embed positive mental health and mental health awareness through our academy to create a culture where pupils can self-identify, signpost peers and seek support

themselves. We undertake staff training and promote mental health awareness through the PSHE schemes.

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

Please see Appendix 3 for the overview of our approach to mental health.

Useful information

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

<https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview>

[We all have mental health: animation and teacher toolkit | Anna Freud](#)

6.16 Self Harm

Adapted from: Guidance for Managing Self-Harm in Warwickshire Schools (2023)

Self-harm affects around 1 in 12 young people (Young Minds, 2020). It is a sign that a child or young person is experiencing significant emotional distress. It does not typically mean they are trying to end their lives but is often a means of trying to cope with overwhelming emotions.

There are many acts of self-harm, some examples may include:

- Scratching / cutting
- Hitting self / walls etc.
- Jumping from heights
- Compulsive hair pulling
- Biting
- Burning skin
- Skin picking or pinching
- Head banging
- Overdosing or drinking harmful substances
- Exercising excessively

There are a number of identified risk and protective factors that are associated with self-harm. However, any child or young person may be at risk and it is important to not make assumptions.

Detailed guidance on managing self-harm in schools can be found on the Warwickshire Safeguarding Adults and Children's Board website, [click here](#).

Useful information

[Guidance for Managing Self Harm in Warwickshire Schools - October 2023 2.pdf \(safeguardingwarwickshire.co.uk\)](#)

7. Children with Special Educational Needs (SEN) and Disabilities

Children and young people with SEN and disabilities can face additional safeguarding challenges as:

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

Safeguarding training for staff and volunteers reminds staff of the additional barriers that some pupils face and offers guidance on how to mitigate this by increased awareness and consideration of those barriers.

We identify and support pupils who might need more support in their awareness of issues and ability to safeguard themselves by:

Providing 1:1 support where necessary, ensuring all pupils, including SEND are educated in how to keep themselves safe – with extra support and explanation given where necessary, access to 'daily check-ins' with a trusted adult, access to small intervention groups e.g. social communication, ensuring staff receive CPD and updates throughout the year on all aspects of SEND best practice. There is oversight of the curriculum by the designated teacher for CiC.

7(ii) Children who are lesbian, Gay, Bi (LGBTQA+) or may be gender questioning

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

In line with Keeping Children Safe in Education (2025) guidance, it is important to consider the Cass review, which identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by clinical professional with relevant experience.

As such, when supporting gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as risk of bullying. Schools should refer to Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationships and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, bi-phobic and transphobic bullying and abuse.

8. Recruitment of Staff and Volunteers

We will ensure that the statutory Safer Recruitment practices are always followed (KCSIE).

Every interview panel will have at least one member who has a certificate in Safer Recruitment. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process.

We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.

We will ensure that any alternative provision facility working with the academy provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.

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

We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. We will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.

The types of checks undertaken will be in accordance with the guidance given in the Keeping Children Safe in Education) document, including online searches of preferred candidates. Candidates will be notified of this.

Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in the current Keeping Children Safe in Education document.

Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.

Recruitment and employment checks will be undertaken as stated in the current Keeping Children safe in Education document. Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file as per KCSIE.

Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA Article 10.

To help schools and colleges comply with the requirements of the Data Protection Act , when a school or college chooses to retain a copy, there should be a valid reason for doing so and it should not be kept for longer than six months. When the information is destroyed a school or college may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to. Schools and colleges do not have to keep copies of DBS certificates, in order to fulfil the duty of maintaining the single central record.

The academy leaders will always ask for written information about previous employment history and check that information is not contradictory or incomplete. Reference will be sought on all shortlisted candidates, including internal ones, before interview, so that any issues or concerns they raise can be explored with the referee and taken up with the candidate at interview. (Unless in some instances where candidates have expressly denied permission for the employer to approach their referees). In these cases, references will be taken up before the candidate's appointment.

The academy leaders will keep a single central record in accordance with the regulations given in the current Keeping Children Safe in Education document.

We reserve the right to carry out all relevant and necessary checks if there is concern about an existing member of staff and will refer to the LADO and DBS and other relevant agencies anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

9. Managing Allegations Against Staff and Volunteers

We will prevent people who pose risks to children from working in our academy by ensuring that all individuals working in any capacity at our academy have been subjected to safeguarding checks in line with the statutory guidance Keeping Children Safe in Education. We have a clear Trust staff behaviour policy (code of conduct) and Whistleblowing for all adults outlining our response to concerns raised or disclosures made about an adult's conduct.

We will always take concerns raised seriously and respond formally to them. We will offer reassurance and safety options for pupils making a disclosure and refer them for support to the DSL and externally if needed. We will always retain the mind-set of it could happen here.

We recognise the possibility that adults working in the academy may harm children. Any conduct concerns (allegations or low level) about the conduct of adults in the academy (including supply staff and volunteers and contractors) should be taken to the Headteacher without delay (or where that is not possible to the LADO and the Trust DSL).

Any concerns about the Headteacher should go to the Trust Chief Executive Officer (CEO) who will ensure that appropriate actions and referrals are followed/made to the LADO. If for any reason you cannot make a referral through these routes you have a duty to refer directly to the Local Authority Designated Officer (LADO) whom you can contact here:

Tel: 01926 745376

Email: Lado@warwickshire.gov.uk

Online reporting form: <https://api.warwickshire.gov.uk/documents/WCCC-1642278725-5220.docx>

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 may have acted in a way that:

- is inconsistent with an organisation’s staff code of conduct, including inappropriate conduct outside of work
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO – although may still merit consulting with and seeking advice from the LADO in some cases

Low-level concerns will be managed by Headteachers in line with Farrer & Co’s guidance (referenced below); retaining all records of low-level concerns (including those which are subsequently deemed by the headteacher to relate to behaviour which is entirely consistent with the staff 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, and with a timeline alongside. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the Headteacher and/or DSL, and the individual they report to; and HR Business Partner, and the individual they report to (Head of People).

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf>

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children or the staff member are protected.

Where a pupil makes an allegation against a staff member, supply teacher or volunteer, the allegation will be taken seriously and acted upon immediately. Parents will be contacted as soon as reasonably possible. The pupil will be offered support and their wishes will be carefully considered before any actions related to said pupil begin.

Where any member of the academy staff or any volunteer has concerns that a person has caused harm, or poses a future risk of harm to vulnerable groups, including children they must act in accordance with the Allegations against staff section of the Trust staff behaviour policy (code of conduct): <https://www.covmat.org/multi-academy-trust-policies/>

Under our duty of care for our employees, we will ensure that we provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The academy leaders will ensure its obligations for confidentiality when an allegation has been made.

Academies may receive an allegation relating to an adult in school who is not an employee or volunteer – for example, a contractor. As with any safeguarding allegation, leaders must follow their safeguarding policies and procedures, including informing the LADO if appropriate. Leaders must also report this immediately to the employer, and seek assurance that the relevant internal procedures are being followed. Should this situation arise, the school will designate a single point of contact for parents and carers of the pupil(s) involved in the alleged incident (this is likely to be the Headteacher or DSL), along with being responsible for providing any support needed. A single point of contact for the contractor will

be designated (which is likely to be the The Head of Operations and Compliance for central contracts and the Headteacher for local contracts), and will facilitate the sharing of information between contractor and Headteacher/DSL to ensure any interim measures required are implemented swiftly and effectively, along with any implications for future practice.

Academies may receive an allegation relating to an incident that happened when an individual or organisation was using their 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, leaders must follow their safeguarding policies and procedures, including informing the LADO.

10. Safeguarding Training

Every year all staff (including non-teaching and volunteers) must undertake the core Child Protection and Safeguarding training. This is recorded and logged. All staff are informed clearly on how to report anything of concern to the DSL, *Jayne Geran* immediately. See Appendix 1 for a flow diagram of how concerns are dealt with at the academy.

All new members of staff, including newly-qualified teachers and teaching assistants, will be given an induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the safeguarding and child protection policy, academy behaviour policy, staff behaviour policy (code of conduct), systems and processes for children who are absent from Education and Keeping Children Safe in Education: Statutory Guidance for Academies and Colleges, Part One, and other related policies.

The Designated Safeguarding Lead will undergo updated child protection training for DSLs every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.

All staff members will undergo safeguarding and child protection training (whole-academy training) which is regularly updated.

All Academy Governance Committee members must undergo governor specific online awareness training at least every two years and core safeguarding training at least annually.

Staff members who miss the whole-academy training will be required to undertake other relevant training to make up for it, e.g., by joining another academy's whole-academy training or completing online modules identified by the DSL as appropriate.

We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-academy training if it takes place during their period of work for the academy.

The Designated Safeguarding Lead will provide at least an annual briefing to the academy on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews. They will also provide regular (at least half termly) safeguarding updates and briefings. This will be supported by the 39 weeks of safeguarding trustwide approach

The academy leaders will maintain accurate records of staff induction and training and evaluate the impact of these, for example through quizzing, discussions with staff.

11. Establishing a Safe Environment in Which Children Can Learn and Develop

We recognise that because of our day-to-day contact with pupils, we are well placed to observe the outward signs of abuse. We therefore establish a safe environment where pupils feel secure and are encouraged to talk openly and are listened to.

We are thoroughly committed to teaching all our pupils about risks and place emphasis on them learning about how to minimise risk. This is done through all pupils engaging in the academy's PSHE programme, the academy engaging in national and local initiatives such as; anti-bullying awareness days, e-safety programmes, and other programmes which raise their awareness and increase their understanding. At the start of the year the 'Protective Behaviours by the Taking care Project' personal safety curriculum is taught across our school. The school engages with the NSPCC 'Speak Out. Stay Safe' programme.

Anti-Bullying and Child-on-Child Abuse

We actively seek to raise awareness of and prevent all forms of child-on-child abuse by educating Academy Governance Committee members, our senior leadership team, staff, pupils, and parents about this issue.

This includes training Academy Governance Committee members, the senior leadership team, and staff on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify, and respond to it.

Please refer to the academy Behaviour Policy and/or Anti-Child on Child abuse and Bullying Policy for more information about how we prevent bullying and wider forms of child-on-child abuse.

If any pupil / member of staff / parent / carer has a concern about bullying, they should report it to: *Jayne Geran (Headteacher)*, *Annvir Poonia, (Deputy Headteacher)* or any member of staff.

Online-Safety

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Filtering and Monitoring

An active and well managed filtering system is an important part of providing a safe environment for pupils to learn. An effective filtering system is in place to block internet access to harmful sites and inappropriate content without unreasonably impacting teaching and learning or school administration, or restricting students from learning how to assess and manage risk themselves.

Roles and responsibilities are clear:

- Academy DSLs are responsible for analysis and management of safeguarding within their academies.
- Academy leaders are responsible for ensuring that all filtering and monitoring notifications are appropriately categorised and responded to.
- The Trust IT Manager is responsible for leading on system, annual review and facilitating training under the leadership of the Head of Operations and Compliance.
- Academy Governance Committee members are responsible for ensuring that the leaders and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The Trust has implemented Senso.Cloud as it's safeguarding services provider. All Primary academies are receiving this service from Senso.Cloud. It monitors computer usage for all users in the school, we protect students and staff members to ensure the safety and wellbeing of all members of the Diocese of Coventry Multi Academy Trust.

Our secondary academy is the only exception and is configured differently as they require a different solution. Currently, they are provided safeguarding services directly via Warwickshire Education Services via the managed product called Radar. This also protects students and staff members.

We are thoroughly committed to improving pupils' e-safety awareness at St Oswald's C of E Academy. Our home academy agreement is signed up to by all pupils/ parents. E-safety awareness is revisited every half term. Staff sign to agree to the Staff Behaviour Policy (Code of Conduct) and IT acceptable use on starting with the school.

If a pupil, parent/carer or member of staff has a concern relating to e-safety they are encouraged to report it. They can report it directly to *Jayne Geran* at the academy. Please refer to the academy's e-Safety Policy.

Photography and images

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

To protect pupils we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Seek parental consent
- Use only the pupil's first name with an image
- Ensure pupils are appropriately dressed

- Encourage pupils to tell us if they are worried about any photographs that are taken of them.

Parents, carers or relatives may only take still or video photographic images of pupils in the academy or on academy-organised activities with the prior consent of the academy and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, including via the academy's annual data collection sheet, their rights will be respected. This is captured in the Trust data protection policy and privacy notices. Should parents' decision change during the academic year, they must notify the academy in writing immediately.

12. Confidentiality and Sharing Information

Staff should only discuss concerns with the Designated Safeguarding Lead, Headteacher or chair of the Academy Governance Committee (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

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

We will act in accordance with the Data Protection Act .

Storage and handling of records

Child protection information will be stored and handled in line with the principles set out in the Data Protection Act and the Trust's **Data Protection Policy** available from the policy page of the Academy or Trust website.

The Data Protection Act do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will never be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Paper records of concern forms and other written information will be stored in a locked facility accessed only by the Designated Safeguarding Lead and those identified as appropriate within the academy. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive; these items will also be password protected and kept in locked storage.

Child protection information will be stored separately from the pupil's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy, they will be sent separate from the pupil's file and under a confidential cover or in an encrypted electronic file.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Headteacher or Designated Safeguarding Lead. The Data Protection Act does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child.

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the **serious harms test** is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act. Where in doubt schools should seek independent legal advice.

Link to serious harm test <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-the-harm-test>

Link to new data protection tool kit for schools:

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

13. Management of the Policy

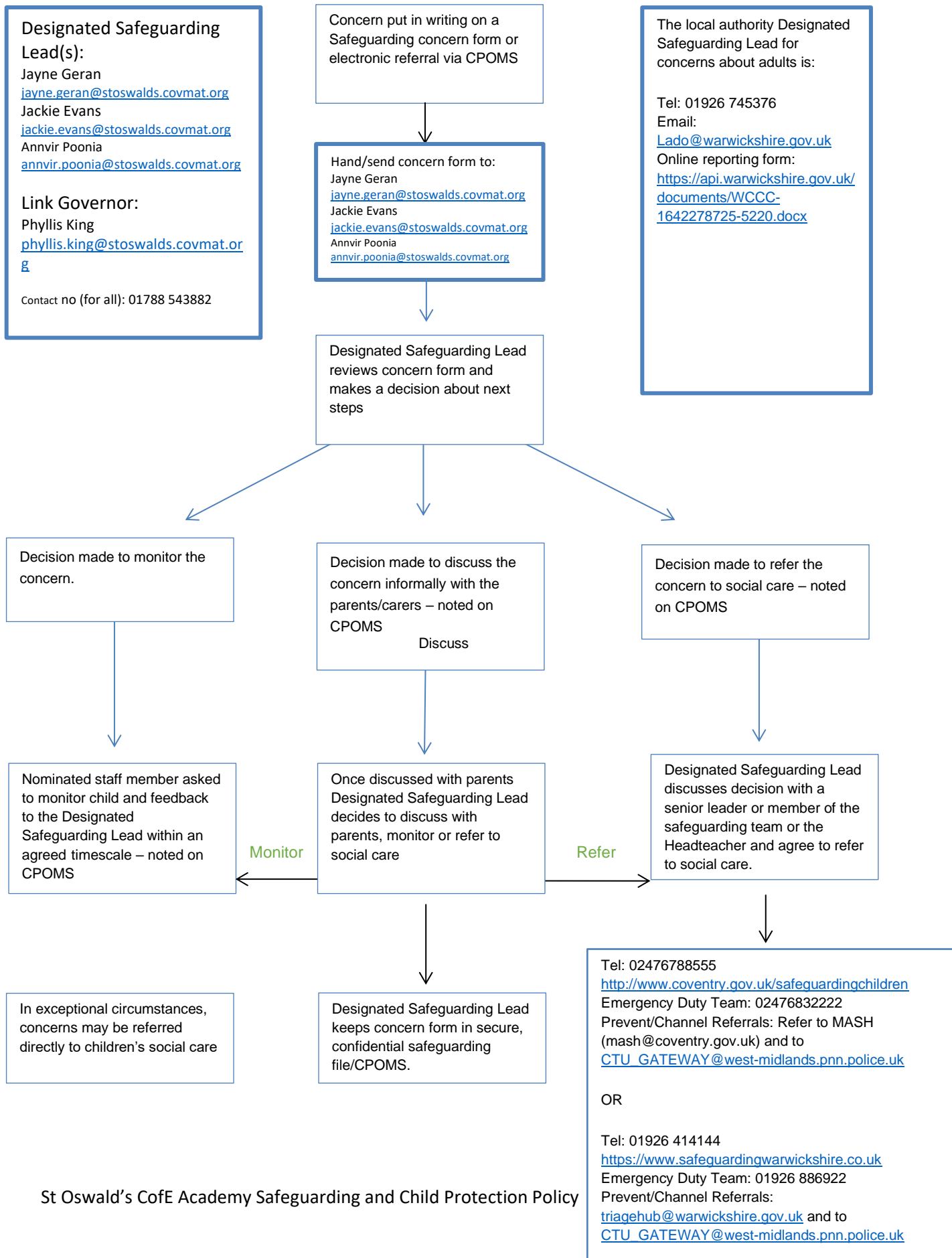
The academy leaders will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the Education Act 2002, the Education (Independent Academy Standards) Regulations and the Education (Non-Maintained Special Academies) (England) Regulations, Currently: Keeping children safe in education: Statutory guidance for academies and colleges and the departmental advice: What to do if you are worried a child is being abused – Advice for practitioners. Nothing written in this policy overrides the academy's duties under such legislation.

Trust Leaders and the Trust Board will oversee the policy, ensure its implementation, and review its content on an annual basis.

The Headteacher will report on safeguarding activity and progress within the academy to the Academy Governance Committee and Trust Leadership Team termly.

Appendix 1

Raising Safeguarding Concerns about a Child



Appendix 2: Alternate Provision Checklist Exemplar (Source: Coventry City Council)			
Name of alternative provision:			
Name of person completing checklist (from host school):			
All agencies and settings who place pupils at alternative provision MUST quality assure the placement. This quality assurance document must be completed prior to working with a new alternative provision and annually thereafter.			
		On file/evidence of check	Date and Initial
1	If this quality assurance check is a review, please confirm the date of previous assurance check.		
2	Is the alternative provision registered as an independent school with the DfE? Y/N The criteria to be registered as an independent school is that; - full-time ¹ education is provided for five or more pupils of compulsory school age Or -full-time education is provided for one or more pupils with an EHC plan or who is “looked after” by a local authority 1 - There is no legal definition of what constitutes ‘full-time’ education. However, DfE would consider an institution to be providing full-time education if it is intended to provide, or does provide, all, or substantially all, of a child’s education		
3	What is the provider’s DfE number? (If applicable)		
4	Copy of signed Service Level Agreement (SLA) /contract (attached)		
5	Is there a clear governance structure within the Alternative provision? Y/N		
6	Does the referral process include the requirement for a detailed pupil profile from the host school prior to agreement of placement? Y/N		
7	Pupil’s attendance must be monitored daily. Is this included in the SLA? Y/N Copy of providers Attendance policy attached		
8	Is there a procedure for when pupils fail to attend? Y/N		
9	Is there adequate access to resources for all pupils who access the provision? Y/N		
10	Is there inclusive practice with regards to positive behaviour management, attendance and punctuality? Y/N - Pro-actively promote and support the regular attendance of pupils Effective reward/incentive strategies to promote participation		

11	<p>Is there regular assessment and review of pupil progress? Y/N this should include a review of the placement to include whether the child is attending, their needs are met and the setting is safe, with the potential that the placement is ended if any concerns are not addressed.</p> <p>Provision agree to share weekly progress reports</p>		
12	<p>Are risk assessments completed for activities that pupils may undertake? Y/N (copy attached)</p>		
13	<p>Is there a full and clear pupil induction procedure regarding health and safety and fire evacuation? Y/N</p>		
14	<p>Are there robust procedures in place to safeguard children in line with KCSIE? Y/N</p> <p>Copy of providers Safeguarding/Child protection policy attached.</p>		
15	<p>Has evidence of staff receiving accredited child protection training been seen? Y/N</p> <p>Has evidence of DSL receiving training for their role been seen? Y/N</p> <p>Have contact details for DSL been provided? Y/N (attached).</p>		
16	<p>Copy of public liability insurance document attached.</p>		
17	<p>Is there a policy for when members of staff are working alone with pupils? Y/N (copy attached)</p>		
18	<p>Does the provider have an ICT policy that includes mobile phones and smart watches? Y/N (copy attached)</p>		
19	<p>Copy of health and safety policy attached.</p>		
20	<p>Has written confirmation from the provider that staff vetting checks have been undertaken been received? Y/N</p> <p>Checks include;</p> <ul style="list-style-type: none"> • an identity check; • a barred list check; • an enhanced DBS check/certificate; • a prohibition from teaching check; • further checks on people who have lived or worked outside the UK • a check of professional qualifications, where required; and • a check to establish the person's right to work in the United Kingdom. <p>Has confirmation of these checks been added to the host school Single Central Record on the agency tab?</p>		
21	<p>Is there a Designated First Aid Officer and suitable equipment available? Y/N</p> <ul style="list-style-type: none"> - Qualified First Aiders identified - Recording system for accidents including informing host school and home - Historical or current RIDDOR investigations <p>Evidence of full first aid kit</p>		

22	Has confirmation been received from the provider that a representative will attend or contribute to multi-agency meetings (e.g. Child protection conferences and core group) when necessary? Y/N		
Action Plan If 'no' is answered to any of the questions in Part 2 an action plan must be formulated to obtain information			
Action Reference Number	Intended Action		

Appendix 3: Mental Health & Wellbeing Overview

At St Oswald's, we teach children about what it means to have good mental health and wellbeing throughout our curriculum and daily practice. We pursue this aim using both universal, whole academy approaches and specialised, targeted approaches aimed at particular pupils who may be in need of additional support e.g. one-to-one support (sometimes children will need additional support for a short period – this may be in the form of a daily check-in with a trusted adult, time to talk through what they are feeling and support in developing ways of moving forwards with this) or specialised interventions such as developing emotional literacy. The academy works with the Mental health at School's Team and a referral can be made to this team, where the academy feels necessary and targeted support can be given via this team.

Our PSHE curriculum focuses specifically on developing children's social and emotional skills which can prevent poor mental health from developing and help all children cope effectively with setbacks and remain healthy. It is about helping children to understand and manage their thoughts, feelings and behaviour and build skills that help them to thrive, such as working in a team, persistence, and self-awareness.

Staff follow an emotion coaching approach with children so that nurturing and emotionally supportive relationships provide optimal contexts for the promotion of children's outcomes and resilience.

The academy develops partnerships with families and the community: proactive engagement with families, outside agencies, and the wider community to promote consistent support for children and young people's health and well-being. This includes parents/carers being encouraged to approach class teachers or the Inclusion Team with any concerns or queries. The Inclusion Team works with additional agencies such as MIND, FIS (Family Information Service) to access additional support for young people and their families and can make referrals for further external support as necessary after discussion with families. Additionally, academy staff can make referrals to the academy Inclusion Team where they require formal extra support for pupils regarding a pupil's mental health and wellbeing.

Should members of staff have any safeguarding concerns regarding pupil mental health, they will follow the academy's established safeguarding system for reporting and recording any safeguarding concerns.

The academy has a senior mental health lead who is also a mental health first aider.

All academy staff have access to the Trust's Health Assured programme, should they need further support with mental health and wellbeing.

Accessing the academy's Mental Health and Wellbeing Policy, via the academy's website will provide further detail regarding the academy's approach to Mental Health & Wellbeing Overview and how the academy implements and monitors referral points.