



**Safeguarding and Child Protection Policy  
for Academies**

**1 September 2025 – 31 August 2026**



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| Date           | Description  |
| 15.7.25        | <p>Draft 2025-26</p> <p>Updated dates</p> <p><b>4.11 Online safety</b> – now includes in Content section:</p> <ul style="list-style-type: none"> <li>• Misinformation</li> <li>• Disinformation</li> <li>• Conspiracy theories</li> </ul> <p>Added reference to mobile phones being used where required for specific purposes (eg: multi-factor authentication where a code to access a system like CPoms is sent to a mobile device)</p> <p>Added reference to training for staff on the safe use of generative AI</p> <p><b>E2 Headteacher Responsibilities:</b></p> <p>Added to point on Alternative Provision “ensuring that written information is obtained from the provider regarding safeguarding checks on staff, regularly review placements at least each half term and respond to any changes appropriately.”</p> <p><b>E4 Designated Safeguarding Lead responsibilities:</b></p> <p>Added point to reflect statutory guidance Working Together to Improve School Attendance: Work with the local authority children’s services when absence indicates a safeguarding concern.</p> |
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# 1. INTRODUCTION FROM CEO TRUST CHILD PROTECTION STATEMENT

## Introduction

“This statement of the University of Chichester Academy Trust’s Child Protection Policy reaffirms the intent of the Trust and its Board to do everything in our power to ensure all the children in our care are protected from harm. It sets out the responsibilities of different people in each academy, but makes clear our philosophy that every adult in our academies is responsible for ensuring our children and young people are safeguarded to the highest standards possible. I ask every one of you to think constantly about how you can improve your day-to-day practice to make sure our children are kept safe from harm. Please give the Policy your total and active support.”

Jennese Alozie, CEO

## Child Protection Statement

The University of Chichester Academy Trust Board recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to. We maintain an attitude of “it could happen here” where safeguarding is concerned. The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our academies and to inform parents and guardians how we will safeguard their children whilst they are in our care. Specific guidance is available to staff within the procedure documents contained in this policy.

While recognising its own legal responsibilities in the matter of child protection, the Board requires all staff, pupils, parents and visitors to act safely and to co-operate in meeting these obligations. The Board believes that child protection is the responsibility of all adults. It will encourage employees to take an active role in ensuring that the highest standard of child protection is extended to all our pupils.

This policy will be reviewed annually by the Trust and noted by each Local Governing Body in the summer or early autumn terms, but by the end of September each year at the very latest. Local Governing Bodies have a responsibility to ensure the academy-related information in the policy remains current.

**In our Trust we will educate and encourage pupils to keep safe through the content of the curriculum and an ethos which helps children to feel safe and able to talk freely about their concerns, secure in the knowledge that they will be listened to and valued.**

## 2. DEFINITIONS

**Safeguarding** and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment whether that is within or outside the home, including online ;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

**Child Protection** is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term **Staff** applies to all those working for or on behalf of the academy, full time or part time, in either a paid or voluntary capacity. This also includes parents and governors.

**Child** refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to pupils of our academy; however the policy will extend to visiting children and students from other establishments

**Parent** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents, guardians and foster carers.

**Abuse** could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care.

**Victim** is used within the policy, but we recognise not everyone who has been subjected to abuse considers themselves to be a victim or want to be described in this way. Staff should be prepared to use any term with which the individual child is comfortable.

**Perpetrator** or **Alleged Perpetrator** are terms used in places. Staff should be mindful when using these terms, especially in front of children as it is possible the abusive behaviour may have been harmful to the perpetrator as well.

**Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse which occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity.

## 3. THE POLICY

### 3.1 Aims, principles and values

- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the Trust and its academies.
- To demonstrate our commitment to protecting children.

#### Principles and Values

- Children have a right to feel secure and cannot learn effectively unless they do so.
- All children regardless of age, gender including trans gender, race, disability, sexuality, religion and non-religion, culture or language have a right to be protected from harm.
- All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the academy or in the community. This is set out in SECTION 4 of this policy.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.
- Whilst the Trust and its academies will work openly with parents as far as possible, we have the responsibility and the right to contact children's social care or the police, without notifying parents if this is believed to be in the child's best interests.

### 3.2 Legal and regulatory framework

This Policy must be read alongside

- each Academy's Behaviour Policy,
  - the Trust Staff Code of Conduct (SECTION 5G) and any future revisions
  - Public Interest Disclosure (Whistleblowing) (SECTION 5L)
  - Part one of Keeping Children Safe in Education 2025 and HR Policies relating to Safeguarding and Child Protection, specifically the requirement of each Academy to ensure the following procedures are in place:
    - Employment checks must be carried out in compliance with regulation as outlined in HR Manual.
    - Temporary and supply staff must be fully briefed about the academy's safeguarding procedures. A sample briefing document is included in SECTION 5E.
    - Visitor Management must follow Trust guidelines as set out in SECTION 5F
    - All visitors must be briefed on arrival about what to do if they see or hear anything which concerns them. A 'script' for reception staff is included in SECTION 5E
- Visitors whose DBS has not been recorded in the academy's single central register must be issued with a red lanyard and accompanied at all times. Visitors whose DBS has been recorded in the academy's single central record must be issued with a green lanyard and are not required to be supervised.

## The legal framework within which this policy stands

Academies must have regard to the statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. This is called [Keeping Children Safe in Education](#). Academies must have regard to it when carrying out their duties to safeguard and promote the welfare of children. **This means that you should comply with it unless exceptional circumstances arise.**

Local Authorities under Section 10 of the Children Act 2004 have a responsibility to promote inter-agency co-operation to improve the welfare of children. This guidance is called [Working Together to Safeguard Children](#) and **applies, in its entirety, to all schools and should be complied with unless exceptional circumstances arise.**

This policy is based on the 2025 Keeping Children Safe in Education (KCSiE) and Working Together to Safeguard Children (2015/2018) and signposts the relevant procedures set out by relevant Local Safeguarding Children Partnerships which are referenced in this policy. The policy also references Disqualification under the Childcare Act 2006 (2015), Female Genital Mutilation Act 2003 Mandatory Reporting Guidance (2016) and statutory Guidance on the Prevent duty under the Counter-Terrorism and Security Act 2015. This policy will be reviewed as and when updates to statutory guidance are published. Any changes will be communicated to each academy through an update to this policy.

There are sections of this policy which invite individual academies to add information relevant to their specific context. This should be undertaken through review processes involving academy staff and agreed by the Local Governing Body. Any additions or amendments **must not supersede** this policy or guidance outlined in this policy, but may add material.

Local Safeguarding Children Partnership protocols and guidance can be found using these links:

**Hampshire** safeguarding children Partnership [protocols and guidance](#)

**Portsmouth** safeguarding children Partnership [protocols and guidance](#)

**West Sussex** safeguarding children partnership [protocols and guidance](#)

### 3.3 Roles and responsibilities

We recognise that staff anxiety around child protection can undermine good practice and so have established clear lines of accountability, training and advice to support the process and individual staff within that process.

In this academy any individual can contact the designated safeguarding lead (DSL) if they have concerns about a young person. There is a nominated safeguarding governor, who will take leadership responsibility for safeguarding. The Chief Executive Officer or the Trust Safeguarding Lead will receive reports of allegations against the headteacher and act on the behalf of the governing body.

The most common reason for children becoming looked after is as a result of neglect and abuse. The Trust expects schools to pay particular attention to the needs of children who are being, or have previously been, looked after by the local authority. We have a designated teacher who works to promote the achievement of these pupils.

In this academy roles are allocated as follows:

| Role   | Name                 | Contact  |
|--|----------------------|--|
| <b>Designated Safeguarding Lead:</b>           | Callie Evans         | c.evans@oakmoor.hants.sch.uk   |
| <b>Designated Safeguarding Officer:</b>        | Lucy Riva            | l.riva@oakmoor.hants.sch.uk  |
| <b>Deputy Designated Safeguarding Lead(s):</b> | Adam Beere           | a.beere@oakmoor.hants.sch.uk   |
| <b>Deputy Designated Safeguarding Lead(s):</b> | Claire Conley-Harper | c.conley-harper@oakmoor.hants.sch.uk   |
| <b>Deputy Designated Safeguarding Lead(s):</b> | Rob Riley            | r.riley@oakmoor.hants.sch.uk   |
| <b>Deputy Designated Safeguarding Lead(s):</b> | Alison Woodage       | a.woodage@oakmoor.hants.sch.uk   |
| <b>Deputy Designated Safeguarding Lead(s):</b> | Nigel Wright         | n.wright@oakmoor.hants.sch.uk  |
| <b>The Chief Executive Officer</b>             | Jennese Alozie       | 01243 793500<br>j.alozie@chi.ac.uk   |
| <b>Trust Safeguarding Lead</b>                 | Natalie Broad        | 01243 793500<br><a href="mailto:natalie.broad@chi.ac.uk">natalie.broad@chi.ac.uk</a> |
| <b>Safeguarding Governor</b>                   | Peter Hurst          | p.hurst@oakmoor.hants.sch.uk   |

Detailed descriptions of the roles and responsibilities of all staff are provided in SECTION 5E. **It is essential all staff read and understand the section(s) relevant to their role(s):**

- E1 All staff

- E2 Senior leadership
- E3 Trustees and Local Governors
- E4 Designated Safeguarding Lead
- E5 Safeguarding Governor
- E6 Safeguarding Trustee

As an employer we comply with the Childcare (Disqualification) regulations 2009 under the childcare act 2006 guidance issued in February 2015. Trust guidance can be found in the Trust HR Manual Policies and Procedures “Staff Disclosure of Disqualification”.

### 3.4 Training

All staff in our academies are expected to be aware of the signs and symptoms of abuse, neglect and exploitation and must be able to respond appropriately.

**As a minimum, the Trust expects academies to provide:**

- annual safeguarding training (including online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) in the form of a briefing for all staff, every year – this includes employees, governors, Trustees and volunteers; the same training as part of induction for staff joining an academy;
- relevant training to ensure staff appointed to specific roles can undertake that role effectively and timely updates to all relevant staff on changes to local or national policy or practice.

In this academy our staff are trained through the following provision:

- annual training in the form of a briefing for all staff, every year;
- the same training as part of induction for staff joining the school;
- relevant training to ensure staff appointed to specific roles can undertake that role effectively;
- timely updates to all relevant staff on changes to local or national policy or practice

### 3.5 Confidentiality

- We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the 'working together' guidance.
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- Information is to be shared with individuals within the Trust who 'need to know'.
- All staff are aware that they cannot promise a child to keep a disclosure confidential.

### 3.6 Child Protection Procedures

The following procedures apply to all staff working in the Trust and will be covered by training to enable staff to understand their roles and responsibilities.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

Staff are alert to signs of abuse, neglect and exploitation, including physical, sexual and emotional abuse, child-on-child abuse, being at risk from or involvement in serious violence and female genital mutilation. They must follow the appropriate procedure set out in this policy and any specific guidance provided within this policy.

All staff are aware that children with disabilities, special needs or with language delay may communicate concerns with behaviours rather than words. Additionally staff will question the cause of knocks and bumps in children who have limited mobility.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence, radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

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

The flowchart in SECTION 5C summarises this procedure.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are worried a child is being abused or at risk of harm. SECTION 4 of this policy aims to provide staff with the knowledge they require to follow the processes and information about specific forms of abuse to which they must be alert.

**This procedure is to be used if a member of staff:**

- **suspects abuse, spots signs or indicators of abuse;**
- **has a disclosure of abuse made to them;**
- **suspects a child might be at risk from or is being sexually or criminally exploited by an individual or a group and/or**
- **is concerned that a child is being radicalised and at risk of being drawn into terrorism.**

There is a specific procedure to follow if a child discloses they have been a victim of female genital mutilation or visually identifies a case, the member of staff will be required to report this to the police with support from the DSL (see SECTION 4.9).

There are specific rules about how to deal with instances of children sharing nudes or near nude images (sexting). All staff must understand these (see SECTION 4.12).

## HOW TO RESPOND

- Make an initial record of the information on CPOMS. Further guidance in SECTION 5A GUIDANCE FOR ALL STAFF ON RECEIVING DISCLOSURES
- Report it to the DSL or Deputy DSL / headteacher immediately
- The DSL or headteacher will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if DSL or headteacher are not immediately available (see 4.2 below)
- Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Dates and times of their observations
  - Dates and times of any discussions they were involved in.
  - Any injuries (use skin maps in SECTION 5D)
  - Explanations given by the child / adult
  - What action was taken
  - Any actual words or phrases used by the child

The records must be signed and dated by the author or / equivalent on electronic based records.

### **Following-up concerns**

Following any concerns raised by staff, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached; or they are not clear if the threshold is met, then the DSL will contact children's social care through the relevant procedure or the police if appropriate. If the DSL is not available or there are immediate concerns, the staff member will refer directly to children's social care. Remember that anyone can make a referral to Children's Social Care or report to the police if they consider a child is at immediate or significant harm and the DSL is not available. More detailed guidance for DSLs is contained at SECTION 5I.

### **Contact for relevant agency:**

**Portsmouth Multi-Agency Safeguarding Hub (MASH): 0845 671 0271/023 9268 8793/0200 555 1373**

**Hampshire Children's Reception Team: 0300 555 1384**

**West Sussex Integrated Front Door (IFD): 01403 229900 (0330 222 6664 out of office hours)**

Generally the DSL will inform the parents prior to making a referral however there are situations where this may not be possible or appropriate particularly when informing parents/carers may place the child at further risk.

***N.B.** The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police, although the DSL should also be made aware.*

***Detailed guidance for responding to disclosures is contained in SECTION 5A***

***Detailed guidance for DSLs in how to follow-up a concern is contained SECTION 5 E4***

## **3.7 Annual review**

As a Trust, we review this policy at least annually in line with DfE, Local Safeguarding Children Boards/Partnerships for Hampshire, Portsmouth and West Sussex and other relevant statutory guidance.

## 4 WHAT TO LOOK FOR, WHEN TO BE CONCERNED AND HOW TO RESPOND

### Early Help

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

### 4.1 Neglect

#### What to look for and when to be concerned

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

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

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on child protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

**NSPCC research has highlighted the following examples of the neglect of children under 12:**

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if you are worried a Child is Being Abused* 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the designated person/child protection co-ordinator.

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

**Physical indicators of neglect**

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

**Behavioural indicators of neglect**

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised

- Stealing or scavenging, especially food
- Destructive tendencies

### **How to respond**

**The designated safeguarding lead (DSL) should be informed and the procedure in this policy SECTION 3.6 CHILD PROTECTION PROCEDURES should be followed.**

## 4.2 Physical abuse

### What to look for and when to be concerned

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.

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g., shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

#### Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult's words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

#### You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched

- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

## How to respond

A skin map (SECTION 5D) can assist in the clear recording and reporting of physical abuse. The skin map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

**The designated safeguarding lead (DSL) should be informed and the procedure in this policy SECTION 3.6 CHILD PROTECTION PROCEDURES should be followed.**

## 4.3 Sexual abuse

### What to look for and when to be concerned

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse

#### Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child, including those with SEND, and often spend time making them dependent
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

#### Indicators of sexual abuse

##### Physical observations

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

##### Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity
- Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn

- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour, Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

#### • **Howtorespond**

**The designated safeguarding lead (DSL) should be informed and the procedure in this policy SECTION 3.6 CHILD PROTECTION PROCEDURES should be followed.**

## 4.4 Child-on-child abuse

The Trust believes that all children have a right to attend school and learn in a safe environment. We recognise that children are capable of abusing their peers. Even if there are no reports, it does not mean it is not happening. In most instances, the conduct of pupils towards each other will be covered by the academy's behaviour policy. Some allegations may be of such a serious nature that they may raise safeguarding concerns and these will be dealt with under this policy and in line with Keeping Children Safe in Education (2025). These allegations are most likely to include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is also likely that incidents dealt with under this policy will involve older students and their behaviour towards younger students or those who are vulnerable or have special educational needs or disabilities (SEND).

### What to look for and when to be concerned

If one or more of these factors is alleged, then it is to be dealt with using this procedure:

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil, including those with SEND;
- is of a serious nature, possibly including a criminal offence;
- raises risk factors for other pupils in the school;
- indicates that other pupils may have been affected by this student and/or
- indicates that young people outside the school may be affected by this student.

Examples of safeguarding issues against a student could include but are not limited to:

#### **Bullying (including cyberbullying, prejudice-based and discriminatory bullying)**

We define bullying as behaviour that is:

- repeated
- intended to hurt someone either physically or emotionally
- often aimed at certain groups, for example because of race, religion, gender or sexual orientation
- It takes many forms and can include:
  - physical assault
  - teasing
  - making threats
  - name calling
  - cyberbullying - bullying via mobile phone or online (for example email, social networks and instant messenger)

#### **Physical Abuse**

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

#### **Emotional Abuse**

- Blackmail or extortion
- Threats and intimidation

#### **Sexual Abuse**

- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery). Specific advice about how to approach incidents of sharing images is contained in SECTION 4.12;
- other behaviours outlined in the Brook traffic light tool (SECTION 5J).

### **Sexual Exploitation**

- Encouraging other children to engage in inappropriate sexual behaviour ( For example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)
- Photographing or videoing other children performing indecent acts

### **Sexual violence**

- Rape
- Assault by penetration and sexual assault

### **Sexual harassment**

- Sexual comments, remarks, jokes
- Online sexual harassment which may be stand alone or part of a broader pattern of abuse

### **Serious violence**

- Including involvement in serious violent crime

### **Upskirting**

- Taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm

### **Initiation/hazing type violence and rituals**

- Harassment, abuse or humiliation used as a way of initiating a person into a group

## **Howtorespond**

All staff must challenge inappropriate behaviours between children that are abusive in nature. Downplaying certain behaviours (for example dismissing sexual harassment as 'banter') can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

When an allegation is made by a pupil against another pupil which features one or more of the elements outlined above, it should be treated as a safeguarding concern. All victims must be reassured that they are being taken seriously, regardless on how long it has taken them to come forward. You should explain how the victim will be supported and kept safe. If the allegation relates to sexual violence or harassment, the victim should be reassured that the law is in place to protect children, not to criminalise them. A factual record of the

allegation should be made, but no attempt at this stage should be made to investigate the circumstances. **The designated safeguarding lead (DSL) should be informed and the procedure in this policy SECTION 3.6 CHILD PROTECTION PROCEDURES should be followed. If the allegation is about sexual violence or harassment, it is essential the DSL proceeds in-line with PART 5 of KCSiE 2025.**

We will minimise the risk of child-on-child abuse by:

- taking a whole school approach to safeguarding and child protection;
- providing training for staff;
- providing a clear set of values and standards, underpinned by the academy's behaviour policy and pastoral support system and by planned programme of evidence-based content delivered through the curriculum and
- engaging with specialist support and interventions.

Additional guidance can be found in SECTION 5:

5J – The Brooks sexual behaviours traffic light tool

5N – Safeguarding implications of sexual activity between children

## **SEXUAL AND CRIMINAL EXPLOITATION**

Both child sexual exploitation (CSE) and child criminal exploitation (CCE) are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **4.5 Child sexual exploitation (CSE)**

#### **Whattolook forandwhentobconcerned**

Child 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 non-contact 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.

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. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

### **4.6 Criminal exploitation and gangs**

#### **Whattolook forandwhentobconcerned**

Child criminal exploitation (CCE) occurs where there is an imbalance of power which is used to coerce, control, manipulate or deceive a young person into any criminal activity in exchange for something the child wants or needs. This can include threat or use of violence. The victim may have been involved in activity which appears consensual because they do not disclose the exploitation or they do not see themselves as victims. The exploitation may take place through technology.

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.

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

While the numbers of children involved in serious violence or gangs may be small, the impact is significant. Young people may become participants or be victims of gang violence. Our job is not to judge whether they are victims or perpetrators – that is for the courts. Our role is to spot the signs and follow the appropriate procedure to ensure a child's safety. Gang membership is likely to result in significant harm through physical, sexual or emotional abuse, take increased risk with their personal safety and sexual health. Members are far more likely to become victims of crime and risk serious injury or death.

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into an area, using dedicated mobile phone lines or other forms of 'deal line'. These criminals are likely to exploit young people and vulnerable adults to move and store the drugs and money and will often use coercion, intimidation, violence (including sexual violence) and weapons. Children are used to transport drugs and money. They can become trapped through debts and threats to them and/or their families.

### **Indicators of risk**

The most vulnerable children are most at risk. This will include looked after children, children with special educational needs, who have a history of going missing or have chronic and traumatic lives.

Specific indicators that a child has been or is being exploited can include:

- Persistently absent from home or school
- Having older boyfriends or girlfriends
- Cases of sexually transmitted infection
- Pregnancy
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling and/or older individuals or groups
- Leaving home/care without explanation
- Suspicion of physical assault or 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

## How to respond

The designated safeguarding lead (DSL) should be informed and the procedure in this policy SECTION 3.6 CHILD PROTECTION PROCEDURES should be followed.

## 4.7 Domestic abuse

### What to look for and when to be concerned

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

### How to respond

The designated safeguarding lead (DSL) should be informed and the procedure in this policy **SECTION 3.6 CHILD PROTECTION PROCEDURES** should be followed.

## 4.8 Emotional abuse

### What to look for and when to be concerned

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

- Most harm is produced in *low warmth, high criticism* homes, not from single incidents.
- Emotional abuse is difficult to define, identify/recognise and/or prove.
- Emotional abuse is chronic and cumulative and has a long-term impact.
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
- Children can be harmed by witnessing someone harming another person – as in domestic violence.

It is sometimes possible to spot emotionally abusive behavior from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An

appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

### **Indicators of emotional abuse**

#### **Developmental issues**

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

#### **Behaviour**

- Acceptance of punishment which appears excessive
- Over-reacts to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

#### **Social issues**

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

#### **Emotional responses**

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

### **How to respond**

The designated safeguarding lead (DSL) should be informed and the procedure in this policy SECTION 3.6 CHILD PROTECTION PROCEDURES should be followed.

## 4.9 Female genital mutilation (FGM)

### What to look for and when to be concerned

FGM is a form of child abuse and is an act of violence against women and girls. It is sometimes also known as female circumcision. Other local terms are:

- Tahoor
- Absum
- Halalays
- Khitan
- Ibi
- Sunna
- Gudnii
- Bondo
- Kutairi

The term FGM is used to refer to the removal of part or all of the female genitalia for cultural or other non-therapeutic reasons. This is extremely painful and has serious consequences for physical and mental health. It can also result in death.

It is illegal to practice FGM in the UK. It is also illegal to take a child abroad for FGM even if legal in that country.

FGM is sometimes incorrectly believed to be an Islamic practice. This is not the case and the Islamic Shari'a Council, the Muslim College and the Muslim Council of Britain (MCB) have condemned the practice of FGM.

FGM is classified into four categories:

- **Clitoridectomy:** partial or total removal of the clitoris and, in very rare cases, only the prepuce
- **Excision:** partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora
- **Infibulation:** narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris
- **Other:** all other harmful procedures to the female genitalia for non-medical purposes, e.g. pricking, piercing, incising, scraping and cauterizing the genital area

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

### How to respond

If you are concerned that a child may be at risk of FGM **the designated safeguarding lead (DSL) should be informed and the procedure in this policy SECTION 3.6 CHILD PROTECTION PROCEDURES should be followed.**

If you discover that an act of FGM appears to have been carried out, you will have to report this to the police yourself, with the support of your DSL.

## 4.10 Radicalisation

### What to look for and when to be concerned

Radicalisation refers to the process of a person legitimising support for, or use of terrorist violence. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

### How to respond

**The designated safeguarding lead (DSL) should be informed and the procedure in this policy SECTION 3.6 CHILD PROTECTION PROCEDURES should be followed.**

The DSL will follow-up through the PREVENT procedures of the Local Safeguarding Children Partnership.

## 4.11 Online safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

### Whattolook forandwhentobconcerned

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

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news), conspiracy theories.

**Contact** – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

### Howtorespond

To protect and educate the whole school community in its safe and responsible use of technology, including mobile technology academies will:

#### Protect

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

Make all pupils, parents and staff aware that they are expected to sign an agreement regarding the acceptable use of the internet and IT systems in school

#### Educate

Educate pupils about online safety as part of the curriculum, including:

- the safe use of social media, the internet and technology, including that used for remote learning;
- keeping personal information private and secure;
- how to recognise unacceptable behaviour online and
- how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.

**Train** staff, as part of their induction, on safe internet use, including technology used for remote learning, and online safeguarding issues including cyber-bullying and the risks of

online radicalisation and safe use of generative AI. Online safety is included in the annual safeguarding training

**Educate parents** about online safety via the academy's website and through communications sent directly to them. We will use these to reinforce the importance of children being safe online, explain how we use filters and monitor online activity, which sites we will ask pupils to use at home and who (if anyone) they will be interacting with. We will also share clear procedures with parents, so they know how to raise concerns about online safety.

### **Set clear guidelines for the use of mobile phones**

Make sure staff are aware of the restrictions placed on them with regards to the use of their mobile phone and cameras, including that:

- staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present and
- where required for specific purposes (eg: multi-factor authentication where a code to access a system like CPOMs is sent to a mobile device;
- staff will not take pictures or recordings of pupils on their personal phones or cameras.

Make sure all staff, pupils and parents are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

### **Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate**

Make sure all staff, pupils and parents are aware of the procedure for reporting incidents or concerns relating to online safety and the importance of this. These should be treated as a safeguarding concern. The designated safeguarding lead (DSL) should be informed who will then follow the procedure detailed in annex 6.

Monitor concerns, including those that do not meet the threshold for significant harm, and working with parents provide support and further education to those involved

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy, which you can find on our academy website or [here](#).

## **4.12 Sharing nudes and semi-nude images (sexting)**

### **What to look for and when to be concerned**

This is the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of

urgency. 'Sharing nudes and semi-nude images' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

## Howtorespond

**Report it to your Designated Safeguarding Lead (DSL) or Deputy DSL immediately.**

- **Never** view, download or share the imagery yourself, or ask a child to share or download – **this is illegal**.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- **Do not** share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

The DSL will follow the full guidance from the UK Council for Internet Safety (UKCIS), 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'. It can be found [here](#).

## 4.13 Children who are absent from education

### Whattolook forandwhentobconcerned

All staff must be aware that a child who is absent from education, particularly on repeat occasions, may be at risk of abuse and neglect, including sexual abuse or exploitation.

### Howtorespond

Our responsibility is to put in place steps to help prevent the risk of children going missing in future:

- We must hold more than one emergency contact number for each pupil where reasonably possible.
- We must provide local authorities with the information required when removing a child from the school roll.
- We will inform the Trust if a child is frequently absent from education or absent for long periods
- We must follow their Local Safeguarding Children Partnership procedures for notifying if a child is absent from education frequently or for long periods.

## 4.14 Safeguarding concerns about staff including supply and contractors

### Dealing with allegations against staff that may meet the harms threshold

## What to look for and when to be concerned

This procedure should be used in all cases, including those that occur outside the school or within an activity provided by those using the school premises, in which it is alleged or suspected a member of staff or volunteer in a school, or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

## How to respond

In dealing with allegations or concerns against an adult, staff must always report any concerns about the conduct of any member of staff or volunteer to the Headteacher or the DSL as soon as possible. If an allegation is made against the Headteacher, the concerns need to be raised with the CEO of the Trust or the Trust Safeguarding Lead as soon as possible.

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Headteacher as soon as possible
- If an allegation is made against the Headteacher, the concerns need to be raised with the CEO of the Trust or the Trust Safeguarding Lead as soon as possible
- There may be situation when the Headteacher or Trust central staff will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headteacher or Central Trust they will, if the threshold is met, contact the Local Authority Designated Officer

Trust Central Team: 01243 793500

Portsmouth LADO: 02392 882500

Hampshire LADO: 01962 876364

West Sussex LADO: 0330 222 6450/01403229900

as soon as possible and before carrying out any investigation into the allegation other than preliminary enquiries.

- Inform Central HR at the Trust
- Inform the parents of the allegation unless there is a good reason not to

In liaison with the LADO, the Headteacher/Trust will determine how to proceed and if necessary the LADO will refer the matter to children's social care and/or the police.

The Trust has a Public Interest Disclosure (whistleblowing) policy which should be referred to if appropriate (SECTION 5M).

If the allegation is against the headteacher, the person receiving the allegation will contact the Trust CEO directly.

## Dealing with allegations against staff that do not meet the harms threshold

### What to look for and when to be concerned

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

### Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- being overly friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door or
- humiliating pupils.

### How to respond

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

Low level concerns must be shared with the Headteacher (or the Trust if the concerns are about the Headteacher)

Staff are encouraged to refer in order to

- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised;
- help to identify any weakness in the school's safeguarding system.

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously
- to the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [staff behaviour policy/code of conduct].

If the concern is about a supply teacher or contractor, the concern should be notified to their employer, so that any potential patterns of inappropriate behaviour can be identified.

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

#### **Records will be:**

Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **4.15 MENTAL HEALTH AND WELLBEING**

### **What to look for and when to be concerned**

As a Trust we place a very high value on the mental wellbeing of our staff and pupils. In relation to child protection, all staff should be aware that mental health can, in some cases,

be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

### Howtorespond

All staff have a responsibility to be aware of children's mental wellbeing and respond appropriately if they have concern. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Trust staff are responsible for identifying children whose behaviour, through day-to-day observation, suggests they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect or other trauma, all relevant staff should be made aware in order for them to appropriately care for their mental wellbeing. The judgement of what to share and with whom it should be shared will be made by the DSL, with a view to ensuring appropriate day-to-day care for the child.

If a member of staff has a mental health concern about a child that is also a safeguarding concern **the designated safeguarding lead (DSL) should be informed and the procedure in this policy SECTION 3.6 CHILD PROTECTION PROCEDURES should be followed**

## SECTION 5 RESOURCES TO SUPPORT STAFF

### 5A Guidance for all staff in dealing with disclosures

#### All staff should:

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.

#### Guiding principles, the seven R's

##### Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

##### Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure e.g. you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

##### Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.

- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

### **Report**

- Share concerns with the designated safeguarding lead as soon as possible
- If you are not able to contact your designated safeguarding lead, and the child is at risk of immediate harm, contact the children's services department directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

### **Record**

- If possible make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'
- Sign and date records or equivalent on electronic based records.

### **Remember**

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Try to get some support for yourself if you need it

### **Review (led by DSL)**

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

### **What happens next?**

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following the report being made. If they do not receive this information they should be proactive in seeking it out.

If they have concerns that the disclosure has not been acted upon appropriately they might inform the safeguarding governor of the school and/or may ultimately contact the children's services department.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases additional counselling might be needed and they should be encouraged to recognise that disclosures can have an impact on their own emotions.

## 5B RECORDING ON CPOMS

All Trust academies will use the CPOMS electronic system to record safeguarding concerns. The system includes recording sheets and body maps which should be used in accordance with your Academy's policy.

The following conventions on coding should be followed as a minimum, but your Academy DSL will explain your own additional requirements.

### REPORTING OF INCIDENTS TO LGBs AND TRUST

Because CPOMS counts incidents rather than headcount, you will need to provide the LGB/Trust with a breakdown of the number of cases open as:

- Child Protection Plan
- Child in Need Plan
- Early help
- Children who are absent from education

You must use the following as a minimum requirement. You may use as many additional categories as you wish, but we will collect your data using the categories set out below.

**Parent Category will be REPORTABLE INCIDENTS** where there is concern that a child is at risk of or has been a victim of abuse, neglect, radicalisation, sexual or criminal exploitation or female genital mutilation.

The relevant **additional** subcategory should also be checked from this list:

- Physical
- Emotional
- Sexual
- Neglect
- Radicalisation
- FGM

### Reporting child-on-child abuse

Report child-on-child-abuse WHERE IT IS DEALT WITH AS A SAFEGUARDING ISSUE, RATHER THAN THROUGH YOUR BEHAVIOUR POLICY by selecting the sub category of abuse **and** child-on-child abuse. For example:

Reportable Incidents >Sexual>Child-on-child abuse

**Where there is Contact with external agency this must be recorded**

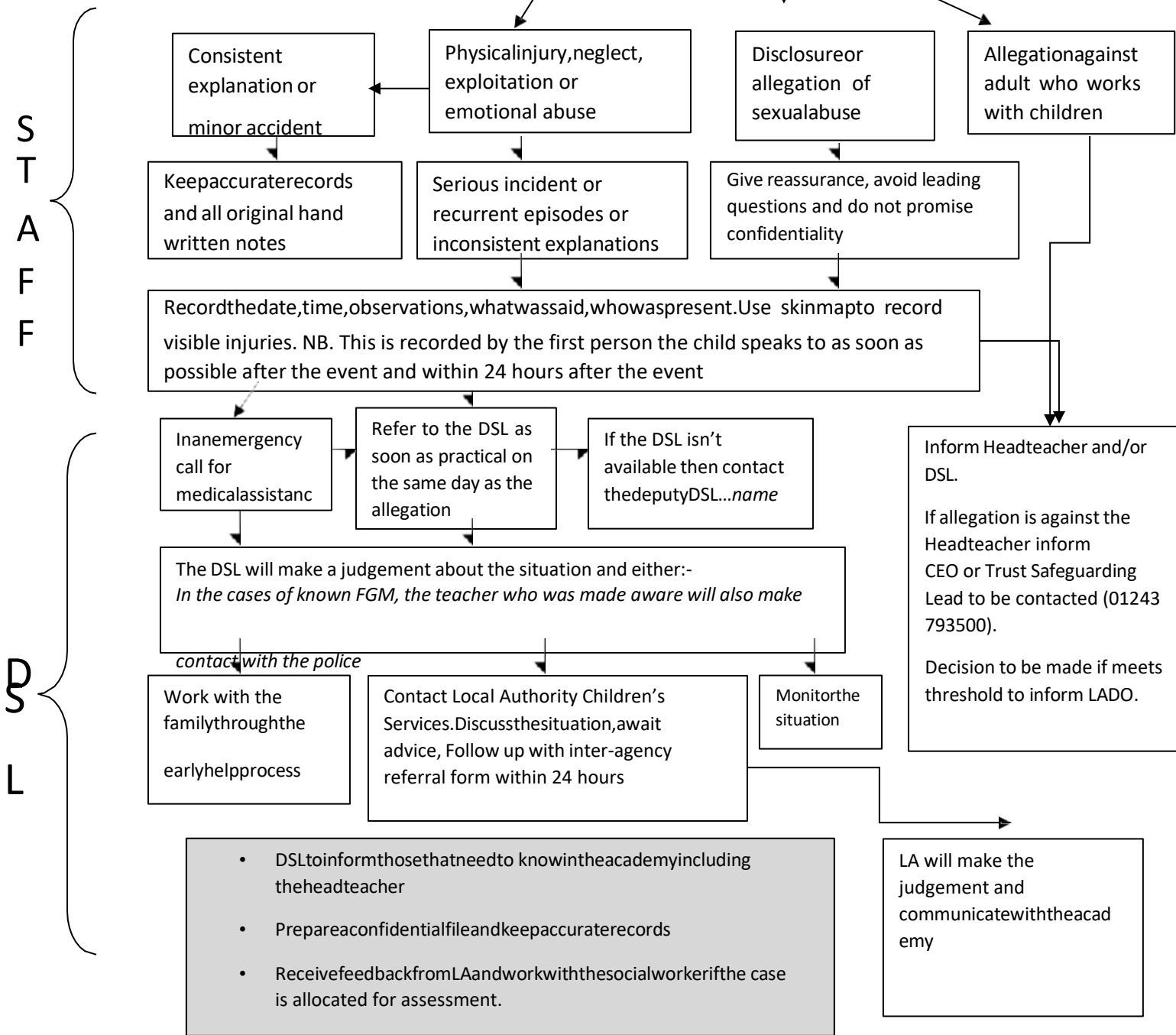
Subcategories of contact:

- Social Care (MASH/Children's Reception Team/Integrated Front Door)
- Police
- Early Help
- ICPC
- Strategy Meeting
- CP Review conference
- Core Group meeting
- CIN meeting
- TAF/TAC

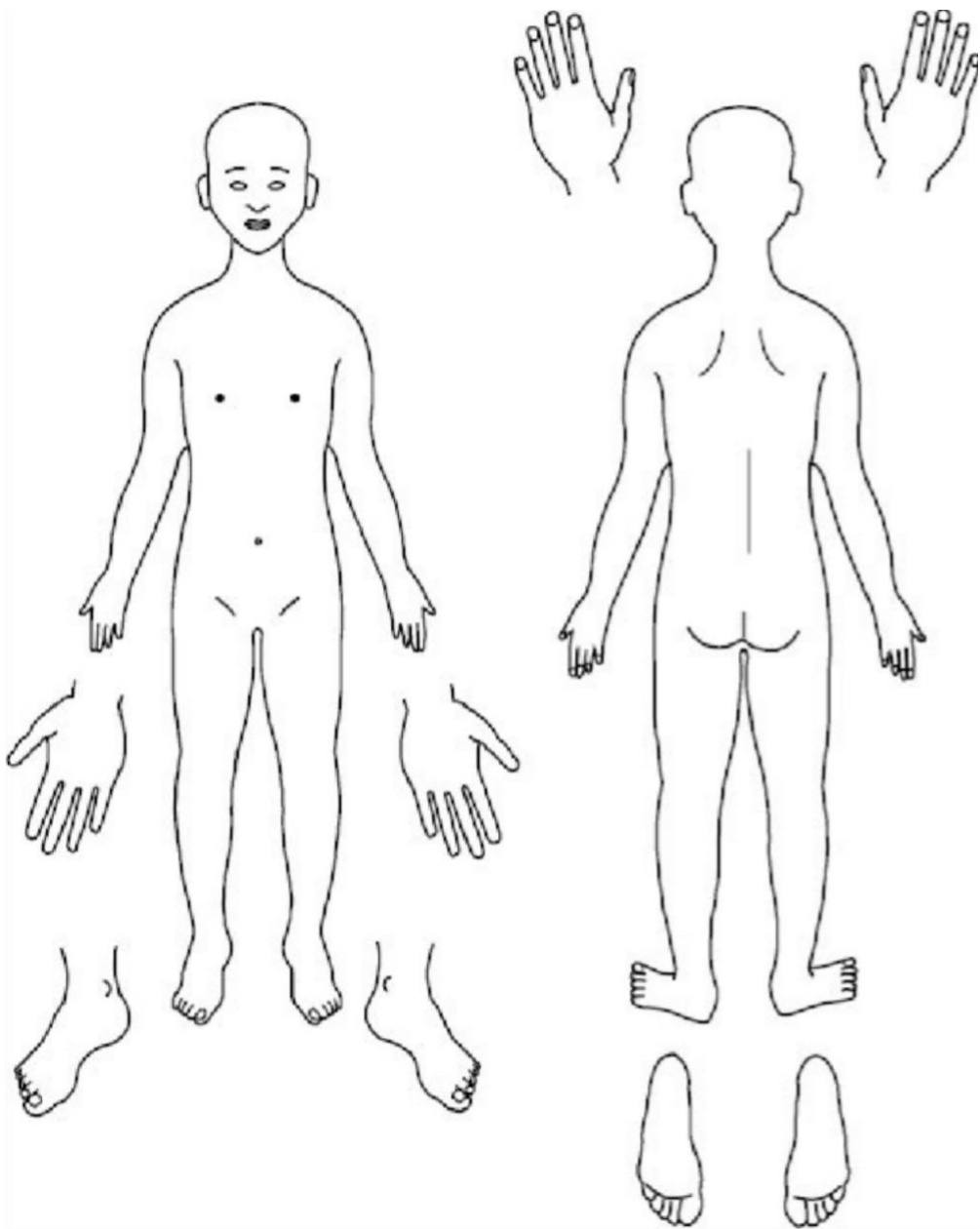
# 5C CHILD PROTECTION FLOWCHART

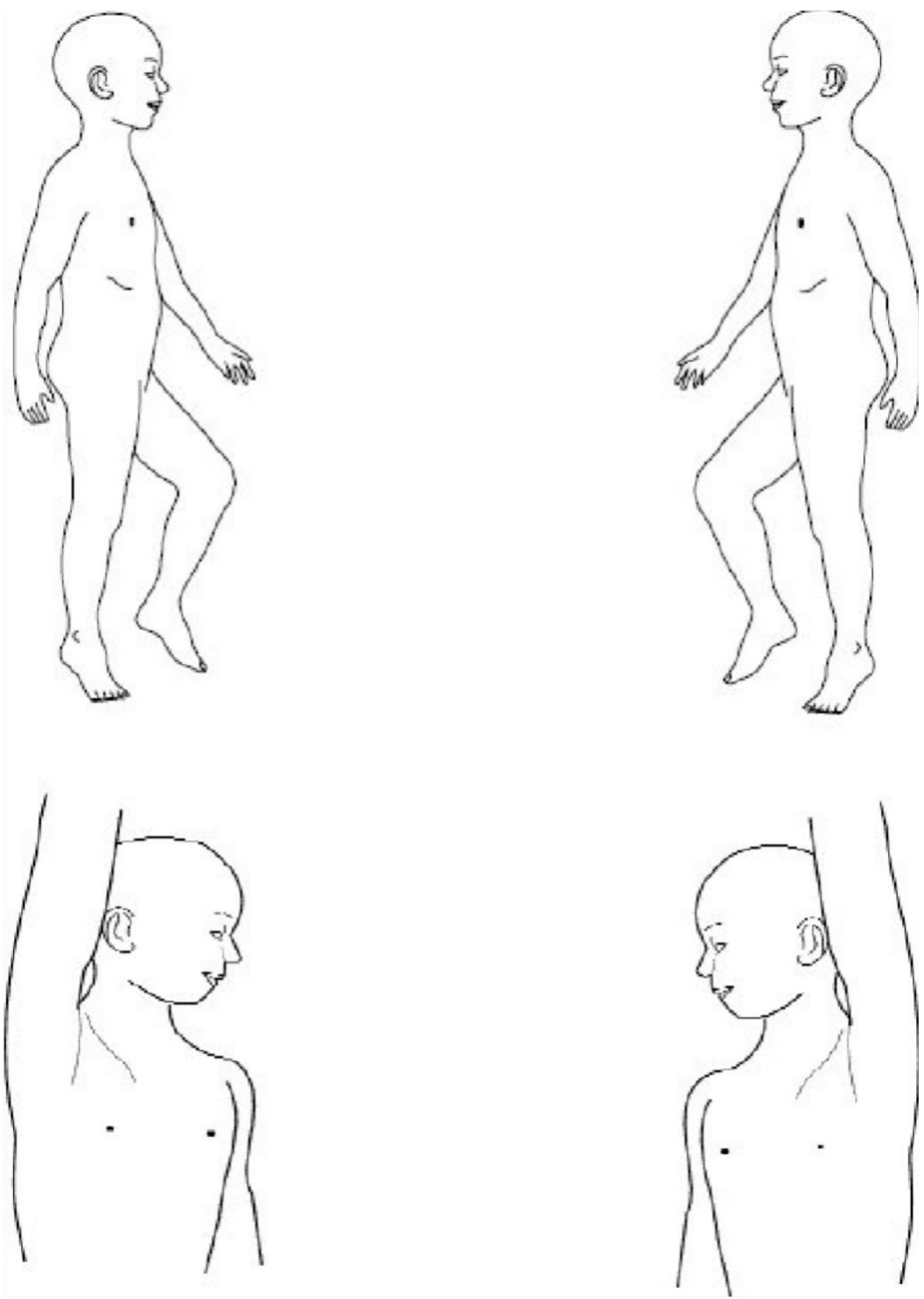
## Flowchart for child protection procedures

DSL – Designated safeguarding lead  
 LACS – Local Authority Children’s Services  
 CRT – Children’s reception team  
 CP – Child protection



### D Skin maps





## E Roles and responsibilities

### E1 All staff

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this they will:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the academy whom they can approach if they are worried about any problems.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse, online dangers including understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Record their concerns if they are worried that a child is being abused and report these to the relevant person as soon as practical that day.
- Be prepared to refer directly to social care, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- If the disclosure is an allegation against a member of staff they report this to the Headteacher or if the allegation is against the Headteacher, to the Central Trust.
- Follow the procedures set out by the Portsmouth/Hampshire/West Sussex Local Safeguarding Children Partnership and take account of guidance issued by the DfE.
- Support pupils in line with their child protection plan.
- Treat information with confidentiality but never promising to “keep a secret”.
- Notify DSL of any child on a child protection plan who has unexplained absence.
- Have an understanding of early help and be prepared to notify colleagues and/or parents of any concerns about their child(ren), and provide them with, or signpost them to, opportunities to change the situation.
- Liaise with other agencies that support pupils and provide early help.
- Ensure they know who the designated safeguarding lead (DSL) and deputy DSL are and know how to contact them.
- Have an awareness of this Child Protection Policy, the Behaviour Policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying), the staff Code of Conduct procedures relating to the safeguarding response for children who are absent from education, particularly on repeat occasions and/or prolonged periods and those who are absent from education and the role of the DSL.
- Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Understand that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or being threatened due to vulnerability, disability and/or sexual orientation or language barriers. This will not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns.

- Determine how best to build trusted relationships with children and young people which facilitate communication.
- Provide an appropriate safe space and identify or act as a trusted adult to support children who identify as lesbian, gay, bi or trans or gender questioning (LGBT) to help reduce any additional barriers they face to speak out or share their concerns.

## **E2 Headteacher responsibilities:**

- Contribute to inter-agency working in line with guidance (Working Together to Safeguard Children, 2018)
- Provide a co-ordinated offer of early help when additional needs of children are identified
- Ensure staff are alert to the various factors that can increase the need for early help.
- Working with children's social care, support their assessment and planning processes including the school's attendance at conference and core group meetings
- Carry out tasks delegated by the Trust or the local governing body such as training of staff; safer recruitment; maintaining a single central register and complying with the visitor management procedure of issuing green and red lanyards
- Complete a Section 11 Compact Audit and submit to the Trust by the end of the first half of the Autumn term each year with the associated action plan. [Hampshire audit tool \(word\)](#)
- [Portsmouth audit tool \(excel\) – select 'Education settings' under The Compact Audit Tool](#)
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the academy.
- Treat any information shared by staff or pupils with respect and follow Portsmouth/Hampshire/West Sussex Local Safeguarding Children Partnership procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from department for education (DfE) in accordance with Trust policy and procedures.
- Ensure the correct processes are used for pupils who are absent from education, particularly on repeat occasions and/or prolonged periods and those who are absent from education and the role of the DSL.
- Make sure that online safety training is included in staff safeguarding and child protection training, including awareness of the monitoring and filtering systems in place
- Regularly review IT monitoring reports and take any actions required
- In early years settings, oversee the safe use of technology, mobile phones and cameras in the setting
- If a pupil is placed with an alternative provision provider, continue to be responsible for the safeguarding of that pupil and be satisfied that the placements meets the pupil's needs, ensuring that written information is obtained from the provider regarding safeguarding checks on staff, regularly review placements at least each half term and respond to any changes appropriately.

## E3 Trust and Local Governing body responsibilities

### The Trust Board

- Is the strategic leader for academies' safeguarding arrangements and will ensure they comply with their duties under legislation
- Will identify a designated Trustee to take leadership responsibility for safeguarding arrangements.
- ALL TRUSTEES will receive appropriate training on safeguarding and child protection which equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in academies are effective and support the delivery of a robust approach to safeguarding.
- Will receive a termly report on safeguarding in our academies and an annual report summarising the outcomes of each academy's Safeguarding Audit.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and local multi-agency safeguarding arrangements.

### Local Governing Bodies will ensure

- the academy has effective safeguarding policies & procedures including this child protection policy the staff code of conduct, a Behaviour Policy and a response to children who are absent from education;
- they comply with their duties under the Human Rights Act (1998), The Equality Act (2010) and local multi-agency safeguarding arrangements;
- all Governors receive appropriate training on safeguarding and child protection which equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in academies are effective and support the delivery of a robust approach to safeguarding;
- the academy undertakes a Section 11 Compact Audit as outlined above, is shared with the LGB and submitted to the Trust as outlined above;
- recruitment, selection and induction follows Trust processes including safer recruitment practice and all appropriate checks;
- allegations against staff are dealt with by the headteacher. Allegations against the headteacher are dealt with by the Trust CEO;
- a member of the senior staff team is designated as designated safeguarding lead (DSL) and have this recorded in their job profile;
- the DSL must work within the requirements as detailed in Annex C of Keeping Children Safe in Education
- staff have been trained appropriately in child protection and safeguarding, including online safety, and this is updated in line with guidance;
- any safeguarding deficiencies or weaknesses are remedied without delay;
- they have identified a nominated governor for leading safeguarding;
- the school has appropriate filtering and monitoring systems in place and review their effectiveness;
- they have up-to-date assurances from the Trust that their provider is meeting the DfE's filtering and monitoring standards;
- the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role;
- staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.

## E4 Designated Safeguarding Lead responsibilities

*(to be read in conjunction with DSL role description in KCSiE)*

In addition to the role of staff and senior management team the DSL will

- Refer cases to social care and the police where appropriate, in a timely manner avoiding any delay that could place the child at more risk.
- Work with the local authority children's services when absence indicates a safeguarding concern.
- Assist the Trust and the governing body in fulfilling their responsibilities
- Attend initial training for the role and refresh this every other year. By attending appropriate training and demonstrating evidence of continuing professional development thereafter
- Ensure every member of staff knows who the DSL is, is aware of the DSL role and has their contact details
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL
- Ensure that whole academy training occurs regularly with at least annual updates so that staff and volunteers can fulfil their responsibilities
- Ensure any members of staff joining the academy outside of this training schedule receive induction prior to commencement of their duties
- Keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as Children's Social Care of the Prevent programme.
- Keep records of child protection concerns securely and separately from the main pupil file and use these records to assess the likelihood of risk
- Ensure that safeguarding records are transferred accordingly (separate from pupil files) when a child transfers school
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, the information is passed to the new school immediately and that the child's social worker is informed
- Link with the LSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Develop, implement and review procedures in our school that enable the identification and reporting of all cases, or suspected cases, of abuse
- Take lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place.
- Meet any other expectations set out for DSLs in Keeping Children Safe in Education 2025.

## E5 The Safeguarding Governor

The link governor for safeguarding will:

- Make sure the school has suitable and up-to-date policies for:
  - Child protection (this is the Trust's Child Protection Policy)
  - Staff code of conduct/staff behaviour
  - Handling allegations of abuse against staff and volunteers, including allegations that do not meet the harm threshold (low-level concerns)
- Monitor the school's safeguarding systems and procedures.
- Make sure the school has an appropriate safeguarding response to children who are absent from education
- Make sure the school has appropriate online filters and monitoring systems in place
- Make sure the school has appointed a designated safeguarding lead (DSL) from the senior leadership team (SLT), with the appropriate status and authority to carry out their duties
- Meet regularly with the DSL to monitor whether the school's policies and procedures are effective, and all staff and governors have had the appropriate level of training (as applicable)
- Make sure the DSL has the additional time, funding, training, resources and support needed to carry out the role effectively
- Make sure the school has appointed a designated teacher to promote the educational achievement of looked-after and previously looked-after children, and that this person has appropriate training
- Make sure the curriculum covers safeguarding, including online safety, which should be a running and interrelated theme in your whole school approach to safeguarding and related policies/procedures
- Make sure that checks to the single central record (SCR) are happening. They will not be checking the SCR themselves
- Keep the LGB up to date with statutory guidance relating to safeguarding and child protection, and any advice issued locally by the school's safeguarding partners
- Inform the board as to whether it needs to make any changes (e.g. in light of new regulations)
- Update the board on how monitoring activities are going
- Attend training for safeguarding link governors
- Make sure all governors and trustees receive safeguarding and child protection (including online) training at induction, which is regularly updated

The link governor for safeguarding **will not**:

- Produce a safeguarding report to the board, as this is done by the headteacher or DSL
- Deal with specific safeguarding incidents, but they will be notified by school leaders when they happen (in general terms)

## E6 The Safeguarding Trustee

The Board's safeguarding link Trustee will:

- Ensure the Board is kept up to date with statutory safeguarding and child protection guidance, including anything issued locally by our safeguarding partners.
- Ensure the Board is informed of the performance of its schools in relation to establishing a strong safeguarding culture and compliance with regulation.
- Ensure the Executive Officers produce an updated policy for child protection when regulation changes (this is normally in September each year).
- Ensure training is provided for all Trustees to enable them to fulfil their obligations set out above.

## 5F BRIEFING SHEET FOR CASUAL AND SUPPLY STAFF AND SCRIPT FOR RECEPTION

### For supply staff and those on short contracts in Oakmoor School.

While working in Oakmoor School, you have a duty of care towards the children/pupils/students here. This means that at all times you should act in a way that is consistent with their safety and welfare.

In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL), who is Callie Evans and can be found in North Building, room N119.

This is not an exhaustive list but you may have become concerned as a result of:

- observing a physical injury, which you think may have been non-accidental
- observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for
- observing behavior that leads you to be concerned about a child or young person
- a child or young person telling you that they have been subjected to some form of abuse

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse, neglect or exploitation
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it, and give your record to the designated person/child protection officer, who should contact children's social care if appropriate

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, in the staffroom and on our website.

**Remember, if you have a concern, discuss it with the DSL.**

**Sample Script for Academy Reception Staff Signing-in Visitors**

“WHILST ON SCHOOL SITE, IF YOU SEE OR HEAR ANYTHING WHICH YOU **PERSONALLY** FEEL IS A SAFEGUARDING ISSUE, PLEASE DO NOT DISCUSS IT WITH ANY OTHER ADULT BUT OUR LEAD SAFEGUARDING OFFICERS (*PROVIDE A CARD WITH NAMES/PHOTOGRAPHS*). A MEMBER OF STAFF WILL DIRECT YOU TO THEM.

PLEASE ENSURE THAT YOU KEEP THE CARD WITH YOU AT ALL TIMES AND RETURN IT TO ME WHEN YOU LEAVE THE BUILDING.








WELCOME TO (Insert name of academy)

**Safeguarding is everyone’s responsibility**

Should you have any queries or concerns during your time with us, please speak to one of the following Safeguarding Leads:

In the unlikely event that all these staff members are off-site, please contact the senior leader in charge. Staff at Reception will be happy to help.

Please return this card to the office when you leave the site.

|   |   |  |   |   |
|---|---|--|---|---|
| <p>Mrs C Evans<br/>(Assistant Headteacher)</p>  <p>DSL</p>       |   | <p>Miss L Riva<br/>(Pastoral Support and Guidance Manager)</p>  <p>Deputy DSL</p> |   |   |
| <p>Mr A Beere<br/>(Assistant Headteacher)</p>  <p>Deputy DSL</p> | <p>Mrs C Conley-Harper<br/>(Deputy Headteacher)</p>  <p>Deputy DSL</p> | <p>Mr R Riley<br/>(Assistant Headteacher)</p>  <p>Deputy DSL</p>                   | <p>Mrs A. Woodage<br/>(Assistant Headteacher)</p>  <p>Deputy DSL</p> | <p>Mr (Headteacher)</p>  <p>De</p> |

THANK YOU”

## 5G STAFF AND VISITOR MANAGEMENT PROCEDURES

The issuing of identity badges to staff, governors and all visitors to the school is a vital component of the Trust’s safeguarding expectations.

### 1. STAFF ID BADGE

All staff should be issued with an identify badge. Everyone should be issued with and wear their photo ID at all times.

### 2. VISITOR ID BADGE

The Trust and its academies have a legal duty of care for the health, safeguarding, safety, security and wellbeing of all pupils and staff. This duty of care incorporates the duty to “safeguard” all pupils from subjection to any form of harm, abuse or nuisance. The Trust therefore requires that ALL VISITORS (without exception) are issued with a Visitor badge.

For the purpose of this procedure a Visitor may be:

- Supply or Agency staff
- External visitors entering the school site during the school day or for after school activities (including peripatetic tutors, sports coaches, and topic related visitors e.g. authors, journalists)
- Parents
- Volunteers
- Contractors e.g. Maintenance, Grounds person
- Independent contractors who may transport pupils in minibuses or in taxis
- An Ofsted Inspector
- Trust Staff
- Trustees
- Governors

Academies are responsible to ensure that an effective sign in and visitor badge process is in place, which clearly identifies whether the visitor is DBS checked and therefore able to meet with pupils and students without supervision when on site.

Regardless of the frequency of visit, all individuals must be issued with an appropriate ID badge.

#### Procedure:

All visitors must report to Reception, give their name and purpose of their visit. They should then complete their details in the Visitor Book or on the electronic system and be issued with a badge.

All visitors will be required to wear the ID badge which must remain visible throughout their visit.

It is expected all visitor badges are issued with **RED** or **GREEN** lanyards. Any non-compliance needs to be discussed personally with the CEO.

- **RED** if the school does not have access to the required DBS check. This visitor must be accompanied while on site, and

- **GREEN** if the required checks have been carried out and the visitor is on the Approved Visitor List.

The Trust will issue the Academy with an Approved List of Trust Staff who have received a clear enhanced DBS check and Children's Barred Check( where appropriate to the role), that they are on the Trust's Single Central Record and can be issued with a **GREEN** lanyard.

### **Approved Visitor List:**

The Academy will hold an Approved Visitor List for visitors who frequently visit and undertake work within the school (e.g. volunteers, contractors and supply staff). To qualify for this list, the visitor must have demonstrated, prior to the visit, that

- a) They have a current clear enhanced DBS check and a copy of this has been registered on the academy's Single Central Record, and
- b) A current clear DBS children's barred check (where appropriate to the role) has been undertaken.

### **Visitor issued with GREEN Lanyard**

All visitors on the approved list must follow the same procedure on entry to the academy (i.e. be issued with a visitor badge at Reception), and can be issued with a **GREEN** lanyard.

### **Visitor issued with RED Lanyard**

If the visitor is issued with a **RED** lanyard, they must be accompanied on site at all times. The member of staff the visitor is meeting will be responsible for that visitor whilst on site and should escort them back to Reception at the end of the meeting. Reception should ensure that a visitor meeting another visitor on site and who is issued with a **RED** lanyard, is accompanied by a member of staff or a visitor who holds a **GREEN** Lanyard.

### **Visitor Departure**

On leaving the academy, all visitors **MUST** leave via Reception and enter their departure time in the Visitors' Book alongside their arrival entry. The visitor must return the ID badge to Reception where it will be destroyed; lanyard and holder to be stored securely.

## **5H STAFF CODE OF CONDUCT (July 2023)**

**Note any future revisions of the Code will apply from date of adoption.**

### **1. Introduction**

This Code of Conduct aims to establish a set of principles which underpin the expected conduct of individuals in all University of Chichester Academy Trust academies, with the intention of encouraging staff to achieve the highest standards of conduct at work and of minimising the risk of improper conduct occurring. The Trust will foster a culture of the highest professional standards. This guidance includes:

- the professional standards expected
- a summary of responsibilities in order to protect and promote the welfare of children and young people
- safer working practices
- whistleblowing procedures

This Code of Conduct cannot provide a complete checklist of what is, or is not appropriate behaviour. However, it does highlight behaviour that is illegal, inappropriate or inadvisable in relation to children and young people. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the children and young

people where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour in order to secure the well-being of the children and young people in their care.

The Trust and its Academies take safeguarding and promoting the welfare of children and young people very seriously. It is expected that staff and everyone who may come into contact with the academies children and families, are familiar with this Code of Conduct, helping to ensure children are safe and enabling all children to achieve their best.

## **2. Scope and Definition**

For the purpose of this document any reference to “staff”, is a reference to all those named above. Any reference to “children” is a reference to “children and young people”. Children and young people are defined as those being under 18 years of age.

Keeping Children Safe in Education (September 2023) is the Department for Education’s statutory guidance issued under Section 175 of the Education Act 2002. This Code of Conduct supports the guidance and all staff including apprentices, temporary and supply staff, governors, volunteers, contractors and student placements, including those undertaking initial teacher training, should be familiar with and behave in accordance with, this Code of Conduct

Academies and their staff form part of the wider safeguarding system for children and young people. This system is described in statutory guidance from HM Government “Working Together to Safeguard Children 2018”.

## **3. Professional standards at work**

Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behaviour and consistently act with honesty and integrity. All staff as appropriate to the role and/or job description of the individual, must:

- place the well-being and learning of children at the centre of their professional practice
- have high expectations for all children, be committed to addressing underachievement and work to help children progress regardless of their background and personal circumstances
- treat children fairly and with respect, take their knowledge, views, opinions and feelings seriously and value diversity and individuality
- model the characteristics they are trying to inspire in children, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people
- respond sensitively to the differences in the home backgrounds and circumstances of children, recognizing the key role that parents and carers play in their children’s education
- seek to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support the young person’s learning and well-being in and out of school
- reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues
- University of Chichester Academy Trust expects staff to treat each other, children, parents and the wider school community with dignity and respect at all times
- Staff must have regard for the ethos and values of their academy, as well as its policies and procedures and act in accordance with these at all times, including in their dealings with those who come into contact with the academy e.g. visitors.

Teaching staff are reminded of, and are expected to uphold, their wider responsibilities as set out in the Teachers’ Standards, including an understanding of, and acting within, the statutory frameworks which set out their professional duties and responsibilities.

## **4. Safeguarding**

It is intended that the underlying principles of safeguarding is that:

- Everyone who works with children has a responsibility for keeping them safe
- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned
- Practices are based on a child-centred approach.

Staff must be aware of their individual safeguarding responsibilities, including to provide a safe environment in which children can learn, to be aware of the signs of abuse, neglect and exploitation, to identify children who are suffering, or are likely to suffer significant harm and to take appropriate action in such cases to prevent concerns from escalating. *Appendix 1 provides information on types of abuse, neglect and exploitation, including Child Sexual Exploitation, Female Genital Mutilation, and Preventing Radicalisation.*

All members of staff must familiar with the safeguarding policy of their academy and be aware of their academy's systems for supporting child safeguarding, including the role of the Designated Safeguarding Lead (DSL). Staff will be provided with guidance on child safeguarding as part of their induction.

Concerns about the welfare of a child must be raised without delay to the Academy's DSL in the first instance or to the Headteacher. In the event that the DSL and Headteacher is unavailable, you should contact another senior member of your Academy or if you have concerns about immediate serious harm to a child your local safeguarding children partnership.

If there is risk of immediate serious harm to a child you should call the policy. If you have an urgent non-critical concern and you are unable to contact your DSL or Headteacher, you can call your relevant Local Authority's safeguarding team:

- Portsmouth Multi-Agency Safeguarding Hub (MASH): 0845 671 0271/023 9268 8793
- Hampshire Children's Reception Team: 01329 225379/0300 555 1384
- West Sussex Integrated Front Door (IFD): 01403 229900 (0330 222 6664 out of office hours)

Staff should be familiar with the school's safeguarding child protection policy, which is available to all staff to download from their Academy's website. All staff will receive appropriate child protection training and will be provided with guidance on child safeguarding as part of their induction.

## 5. Appropriate relationships

Individuals who work or volunteer in an academy environment are in a position of trust. Staff should be mindful of the need to maintain professional boundaries appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably.

Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimised.

Staff must avoid unnecessary physical contact with children. Where physical contact is essential, e.g. for safety reasons, the child's permission must be gained for that contact wherever possible. Any physical contact used to remove a child from a dangerous situation or to prevent either harm to a child or others, should be recorded and immediately reported to the Academy's DSL or Headteacher. Cases where accidental physical contact was made, should also be reported to the Academy's DSL or Headteacher.

## **6. Behaviour management and Physical Intervention**

All children have a right to be treated with respect and dignity. Staff must not use any form of degrading treatment to punish a child. The use of sarcasm, demeaning or insensitive comments towards children is not acceptable in any situation. Deliberately intimidating children by overwhelming physical presence is not acceptable in any situation.

Physical restraint should only be used as a last resort. The circumstances in which staff can physically intervene with a child are covered by the 1996 Education Act. Staff may legitimately intervene to prevent a child from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff should have regard to the health and safety of themselves and others. Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence.

## **7. Contact with Children and Young People and the abuse of trust**

Any sexual behaviour, whether by a member of staff, with or towards a child or young person, is not tolerated in any form. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. The Sexual Offences (Amendment) Act 2000 specifically established a criminal offence of the abuse of trust in relation to teachers and others who are in relationship of trust with 16 -18 year olds.

Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. 'Working Together to Safeguard Children', defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening".

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person and manipulate that relationship so that sexual abuse can take place. Staff should be aware that conferring special attention without good reason or favouring a child has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

A relationship between a member of staff and a child cannot be a relationship between equals. There is potential for exploitation and harm to children and all adults have a responsibility to ensure that the unequal balance of power is not used for personal advantage or gratification.

## **8. One to One Situations and Meetings**

Staff working in one to one situations with children may be more vulnerable to allegations. Staff must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and children are met. Where a one to one meeting is unavoidable, it is advisable to avoid remote or secluded areas of the academy and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis.

## **9. Contact with Parents**

Staff are expected to interact with parents in a polite and respectful manner and recognise parents' entitlement to express any concerns they may have about their child's learning, safety or wellbeing. Staff should avoid discussing school matters with parents outside school

if approached and should instead refer the parent to the normal school communication channels.

## **10. Contact the general public**

There is a general expectation of the Trust that staff will be polite to members of the public at all times. Staff must ensure that any information provided in relation to the academy is accurate and respect confidential information provided to them in the course of their work. Significant concerns or complaints expressed to them by parents, carers or the general public must be passed immediately to the senior management of the academy.

## **11. First Aid**

All Academies must have trained first aiders/appointed persons. Staff must have had the appropriate training before administering first aid or medication except in an emergency.

## **12. Use of IT including social media**

Social networking sites offer the opportunity for communication with children, young people and their parents outside normal professional boundaries. Academy staff must take care to protect their privacy and protect themselves from risk of allegations in relation to inappropriate relationships and cyberbullying. Staff must exercise care and maintain appropriate boundaries in online relationships with parents or pupils through social networking sites, instant messaging or other media, whether this is through academy or personal IT facilities.

Internal e-mail and internet systems must be used in accordance with the E-Safety and acceptable use of ICT Policy, available to download from the Academy Portal. Staff must not post material which damages the reputation of the Trust or which causes concern about their suitability to work with children and young people.

Staff must not give their personal details such as home/mobile phone number; home or e-mail address to children unless the need to do so is agreed with a member of their senior management team.

## **13. Confidentiality and disclosure of information**

Staff must ensure that they do not disclose confidential information to anyone who does not have the right to receive it. Where information is disclosed this should be in line with the principles of the Data Protection Act 2018. If there is doubt about whether or not to share information, advice must be sought from the Headteacher or another appropriate senior member of staff.

Confidential information about children must be held securely and in line with Trust procedures. Confidential information about children must not be held off the school site, other than on security protected school equipment. Information must only be stored for the length of time necessary to discharge the task for which it is required.

Information obtained during the course of an individual's work should never be used for personal gain or benefit, nor should it be passed onto others who might use it in such a way.

## **14. Equality and Diversity**

The Trust and its academies are committed to creating an inclusive environment in which the diversity of individuals is enriching and celebrated, and where working in an atmosphere of mutual respect is supportive and fair, enabling equality of opportunity.

The Trust nor its academies will tolerate any form of discrimination or abuse by staff, parents or anyone else connected with the Trust, its academies and its activities. All staff are expected to uphold these principles. In order to advance equality of opportunity it is recognised that this may require treating individuals differently.

When recruiting and selecting staff and volunteers academies should comply with the Trust's Recruitment and Selection Policy, a copy of which is held in the Academy's HR Manual or available to download from the Academy Portal.

### **15. Propriety, Behaviour, Reputation and Appearance**

All staff should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, students and the public in general. An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting or bring the Trust into disrepute.

A person's dress and appearance are matters of personal choice and self-expression. However staff must ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct. The Trust and its academies recognise the diversity of cultures and religions of its staff and will take a sensitive approach when this affects dress and uniform requirements. However, priority will be given to health and safety, security and other similar considerations of other staff, pupils and the school.

### **16. Conduct outside work**

Care should be taken by staff to avoid any conflict of interest between activities undertaken outside of the academy and responsibilities within the academy. In no case should outside activities bring the academy into disrepute.

Where staff are in doubt as to whether there is a conflict of interest advice must be sought from their line manager or Headteacher in the first instance.

### **17. Declaration of interests**

Staff should consider carefully whether they need to declare to the academy any relationship with an individual where this might cause a conflict with the academy's activities, for example, a relationship with a Governor, another staff member or a contractor who provides services to the academy. Where such a declaration is necessary this should be made to the Headteacher.

### **18. Outside Work**

Any work undertaken outside the Academy, either paid or voluntary, must not conflict with the interests of the Academy, nor be at a level which may contravene the Working Time Regulations or affect an individual's performance at work. All staff are bound by a duty of fidelity which they should not breach confidence or participate in competing activities.

### **19. Public Interest Disclosure**

The Public Interest Disclosure Act 1998 (as amended) gives protection to people who disclose reasonable concerns about serious misconduct or malpractice at work. This is sometimes known as whistleblowing. The Trust and its academies will treat all matters of malpractice very seriously and allegations about such matters will be dealt with quickly and with appropriate confidentiality.

Staff should acknowledge their individual responsibilities in bringing matters of concern to the attention of senior leadership in their academy. This is particularly important where the welfare of children may be at risk.

A clear procedure is provided for staff to raise issues with the purpose of assisting in reducing the risk of serious concerns being mishandled, whether by the individual or by the academy. Please refer to the Whistleblowing Policy

## **20. Health and safety**

Staff must adhere to their academy's Health and Safety policy and should ensure that they take every action to keep themselves and others in the academy environment safe.

## **21. Educational Visits and after-school activity**

Staff should take particular care when supervising children in the less formal atmosphere of an educational visit, particularly in a residential setting, or after-school activity. Staff remain in a position of trust and the same standards of conduct apply.

## **22. Gifts and hospitality**

There may be occasions where children or parents wish to pass small tokens of appreciation to staff, for example as an end of year 'thank-you', and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value or to suggest to pupils that gifts would be appropriate or desired. Money should never be accepted as a gift. It is not acceptable for staff to give gifts to pupils and any rewards given to children must be given in agreement with the academies reward system.

Staff should not solicit or accept any gift, hospitality or other reward from external parties which influences the way in which they carry out their duties or leads the giver to expect preferential treatment.

## **23. Use of Resources and Funds**

The use of academy resources, property and equipment is for academy-related activities only, except where otherwise agreed by the Headteacher.

All members of staff must use any public or academy funds entrusted or handled by them in a responsible and lawful manner and in line with the Academies Financial Handbook 2014 and Financial Procedures Manual.

## **24. Appointment of Staff**

Staff must not be involved in the appointment or any other decision relating to the discipline, promotion, pay or conditions of another employee, or prospective employee, who is a relative, friend or partner. In this paragraph: 'Relative' means a spouse, partner, parent, parent-in-law, son, daughter, step-son, step-daughter, child of a partner, brother, sister, grandparent, grandchild, uncle, aunt, nephew, niece, or the spouse of partner of any of the preceding persons. Partner' means a member of a couple who live together or who have a close personal relationship.

## **25. Trade union membership**

The Trust supports the system of collective bargaining and believes in the principle of solving industrial relations problems by discussion and agreement. It may be advantageous for staff to belong to a trade union that represents them on the appropriate negotiating body. All staff are encouraged to be a member of an appropriate trade union.

## **26. Breach of Conduct**

Breach or failure to observe the provisions of this document may lead to action being taken under the Academy's Disciplinary Policy, a copy of which is available from your Academy's Business Manager or Headteacher.

## **27. Queries**

Where clarification is required on any aspect of this document Individuals should contact their Headteacher in the first instance.

## 28. Communication

All new staff will be informed of their Academy's Code of Conduct to read and sign as part of their employment pack and a copy placed on the Academy's staff noticeboard. Casual, Temporary and Supply staff and Contractors will receive a copy on confirmation of work. Governors and Volunteers should receive a copy as part of their induction. A further copy will be placed in the Academy's HR Manual and a copy placed on the Trust's Academy portal and Academy's website.

## 29. Photography

Many school activities involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement. The Data Protection Act 1998 affects the use of photography. An image of a child is personal data and it is, therefore, a requirement under the Act that consent is obtained from the parent of a child for any images made such as those used for Academy web sites, productions or other purposes.

Using images of students for publicity purposes will require the age-appropriate consent of the individual concerned and their legal guardians. Images must not be displayed on websites, in publications or in a public place without the consent of the individual or legal guardian. The definition of a public place includes areas where visitors to the school have access.

## 51 PROCEDURE FOR DSLs RECEIVING CONCERNS

**Following a report of concerns from a member of staff, the DSL must:**

1. Decide whether or not there are sufficient grounds for suspecting significant harm in which case a referral must be made to children's social care or the police if appropriate.
2. Normally the school should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to children's social care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.
3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm they must contact children's social care via the MASH contacts Contact for relevant Children's Service:

**Portsmouth Multi-Agency Safeguarding Hub (MASH): 0845 671 0271/023 9268 8793**

**Hampshire Children's Reception Team: 01329 225379/0300 555 1384**

**West Sussex Integrated Front Door (IFD): 01403 229900 (0330 222 6664 out of office hours)**

and make a clear statement of:

- the known facts

- any suspicions or allegations
- whether or not there has been any contact with the child's family

If the DSL feels unsure about whether a referral is necessary they can phone MASH to discuss concerns, depending on local protocols.

4. If there is not a risk of significant harm, then the DSL will either actively monitor the situation or consider the early help process
5. The DSL must confirm any referrals in writing to children's social care, within 24 hours, including the actions that have been taken. The written referral must be made using the inter-agency referral form (IRAF) which will provide children's social care with the supplementary information required about the child and family's circumstances. (IRAF can be accessed at the following link

Hampshire: <https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/contacts>

Portsmouth: <https://www.portsmouthscp.org.uk/worried-about-a-child-suffering-from-harm/>

West Sussex: <https://www.westsussexscp.org.uk/>

6. If a child is in immediate danger and urgent protective action is required, the police must be called. The DSL must also notify children's social care of the occurrence and what action has been taken
7. Where there are doubts or reservations about involving the child's family, the DSL should clarify with children's social care or the police whether, the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
8. When a pupil is in need of *urgent* medical attention and there is suspicion of abuse the DSL or headteacher should take the child to the accident and emergency unit at the nearest hospital, having first notified children's social care. The DSL should seek advice about what action children's social care will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

## 5J Public-interest concerns (whistle-blowing)

### Introduction

The Trust has drawn on guidance issued by the following in drawing up this policy:

- Public Concern at Work, (PCAW), an independent UK charity which addresses ethics, accountability and whistleblowing and
- Education Funding Agency guidance on 'Whistleblowing'

### The Public Interest Disclosure Policy

The Public Interest Disclosure (PID) Policy and Procedure of the University of Chichester Academy Trust ('the Trust') is designed to:

- Support the Trust's values
- Ensure that staff can raise concerns without fear of incurring retribution
- Provide a transparent and confidential process for dealing with concerns.

The Policy is in response to the Public Interest Disclosure Act 1998 which gives rights to employees who disclose certain types of information to their employer. The purpose of the Policy is to enable disclosures about serious malpractice, such as financial irregularity, a criminal offence, failure to comply with a legal obligation, dangerous working conditions or fraud to be raised without fear of recrimination or victimisation.

All public bodies must conduct their affairs in a responsible and open manner and comply with the requirements of UK legislation, their funding bodies, accrediting organisations and the good practice set out in the reports of the Committee on Standards in Public Life. As a private company limited by guarantee, the Trust must also comply with its Articles of Association, company and charity law.

Members of staff may be the first to know when something goes wrong; this Policy and Procedure is the mechanism through which concerns raised can be properly investigated and, if appropriate, corrective action taken.

This Policy covers matters relating to:

- Improprieties in matters of financial reporting
- Fraud
- Corruption, bribery or blackmail
- Criminal offences
- Failure to comply with a legal or regulatory obligation
- Failure to properly safeguard assets
- Miscarriage of justice
- Endangering the health and safety of an individual
- Concealment of any of the above

The Trust will not tolerate the harassment or victimisation of anyone raising a genuine concern. Any individual making a disclosure will retain their anonymity unless they agree otherwise. The Trust will ensure that any individual raising a concern is aware of the person who is handling the matter. The Trust will ensure that no-one will be at risk of incurring some form of retribution as a result of raising a concern, even if they are mistaken. This safeguard will **not** however, extend this assurance to someone who maliciously raises a matter they know to be untrue.

### Public Interest Disclosure Act 1998

All UK employees are protected under the Public Interest Disclosure Act 1998 when they make a protected disclosure. This is a disclosure which, in the reasonable belief of the employee making the disclosure, covers the following employer activities:

- A criminal offence has been, is being, or is likely to be committed
- A person has failed, is failing, or is likely to have failed to comply with any legal obligation to which they are subject
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health and safety of an individual has been, is being, or is likely to be endangered
- The environment has been, is being, or is likely to be damaged
- Information relating to the above is being deliberately concealed.

#### Raising concerns without blowing the whistle

Members of staff may be the first to know when something goes wrong. The Trust has a number of mechanisms for these to be dealt with, such as line management meetings or making use of the Grievance Procedures, where the Public Interest Disclosure Procedure does not need to be triggered.

#### Staff Concerns

In the normal course of events, staff are encouraged to raise concerns with their line manager, the Head teacher(academy) or the Director of Financial and Commercial Services/Accounting Officer (Trust).

#### How to raise a concern

##### *Within the Trust*

If members of staff have a concern about malpractice, or possible malpractice, they should raise this initially with their line manager either verbally or in writing. If members of staff feel unable to raise the matter with their line manager they should raise it with a more senior member of staff or the Director of Financial and Commercial Services at the Trust.

However, staff may feel, rightly or wrongly, that their own position will be jeopardised if they raise a particular concern in this way and sometimes the usual channels may seem inappropriate. These concerns could relate to the behaviour of:

- A member of staff
- A senior manager
- A member of the Board of Governors or a co-opted member of one of its Committees
- A member of the Trust
- A member of the Trust Board
- Or the propriety of decisions made by committees or other groups.

In such cases, staff are encouraged to use the Public Interest Disclosure procedure as set out below.

##### *Outside the Trust*

Staff may also 'blow the whistle' to someone outside the Trust. They are protected under the terms of the Public Interest Disclosure Act in doing so when they:

- reasonably believe the information tends to show a specific malpractice;
- are acting in good faith;
- do not make the disclosure for personal gain; and
- believe that the information is substantially true.

Issues may only be raised with an external person where they relate to:

- A crime or breach of regulatory, administrative or common law;
- A miscarriage of justice;
- Danger to health and safety; or
- Damage to the environment

Guidance on whether a concern is relevant for this Policy and Procedure can be obtained from Public Concern at Work, [www.pcaaw.co.uk](http://www.pcaaw.co.uk)

### Public Interest Disclosure Procedure

#### *Confidentiality*

Any person making an allegation should be guaranteed that the allegation shall be regarded as confidential by the receiver until a formal investigation is launched. Thereafter, the identity of the person making the allegation may be kept confidential, if required, unless this is incompatible with a fair investigation, or if there is an over-riding reason for disclosure. The Trust reserves the right not to investigate allegations which have been made anonymously.

#### *The Allegation*

Any allegation by a member of staff should normally be made to their line manager; if the allegation concerns the line manager, the allegation should be made to the next line manager. The person to whom the allegation is made should make a record of its receipt and of what subsequent action has been taken.

Provided the allegation has been made lawfully, without malice and is in the public interest, the employment of the person cannot be disadvantaged for reasons of making the allegation. Action by a manager or others to deter a member of staff from raising a concern about an irregularity or other malpractice may be considered to be a disciplinary offence.

#### *The Investigation*

Any allegation made under this procedure shall normally be the subject of a prompt and thorough investigation by the Investigating Officer who shall be either the Accounting Officer or a person or persons appointed by him or her. The Trust will take steps to ensure that the investigation is not carried out by the person who may ultimately have to reach a decision on the matter.

If the matter to be investigated is thought potentially to involve gross misconduct, and where a member of staff is the subject of the allegation, the individual may, with the approval of the Chair of the Trust Board, be immediately suspended while the investigation proceeds.

Similarly if, during the investigation, the Investigating Officer believes that a serious breach of discipline may have occurred, he or she may make a recommendation to the Chair of the Trust Board that the individual be suspended. Any decision to suspend will be confirmed in writing as soon as reasonably practicable; suspension is a precautionary measure pending the outcome and should not be considered to be a disciplinary issue.

Other than in exceptional circumstances, the investigation will always include an interview with the individual concerned, [who may be accompanied by a work colleague or Trade Union representative] as well as other relevant witnesses. The individual, against whom the allegation is made, will have the right to representation and copies of any witness statements collected.

The Investigating Officer will summarise the facts in a brief report to the Chair of the Trust Board and a copy will also be sent to the individual who is the subject of the allegation. The

investigation and report must be completed within fifteen working days of the allegation being made.

Throughout the process, the Investigating Officer will give as much feedback as possible, without any infringement of a duty of confidence owed by the Trust to someone else.

#### *The Outcome*

The Chair of the Trust Board will consider the investigation report and inform the individual in person of any action which he or she proposes to take within five working days of receipt of the report. The Chair of the Trust Board's decision will be confirmed in writing to the person who made the allegation and the person against whom the allegation was made.

#### Further investigation

Where no investigation is carried out, and the allegation is effectively dismissed, the person making the allegations shall be informed and given the opportunity to resubmit the allegation to some other person or authority within the Trust.

#### Senior Staff

Allegations against senior staff, for example a Head teacher or a Director should be reported to the Chair of the Trust Board in the first instance.

#### Final Report

The Trust Secretary will report all allegations and the action taken to members of the Trust Board as soon as possible

**Approved by Finance and Audit Committee March 2015**

## **5K The safeguarding implications of sexual activity between children**

The intervention of child protection agencies in situations involving sexual activity between children can require difficult professional judgments. Some situations are statutorily clear – for example, a child under the age of 13 cannot consent to sexual activity. But it will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to notice. In our society generally the age at which children become sexually active has steadily dropped. It is important to distinguish between consensual sexual activity between children of a similar age (where at least one is below the age of consent), and sexual activity involving a power imbalance, or some form of coercion or exploitation. It may also be difficult to be sure that what has or has been alleged to have taken place definitely does have a sexual component.

As usual, important decisions should be made on a case by case basis, on the basis of an assessment of the children's best interests. Referral under safeguarding arrangements may be necessary, guided by an assessment of the extent to which a child is suffering, or is likely to suffer, significant harm. Key specific considerations will include:

- The age, maturity and understanding of the children;

- Any disability or special needs of the children;
- Their social and family circumstance;
- Any evidence in the behaviour or presentation of the children that might suggest they have been harmed;
- Any evidence of pressure to engage in sexual activity;
- Any indication of sexual exploitation;
- There are also contextual factors. Gender, sexuality, race and levels of sexual knowledge can all be used to exert power. A perpetrator of sexual abuse may sometimes be a woman or girl and the victim a boy. The Brook traffic light tool (Annex 7) can be useful in making these considerations.