



# **Three Saints Academy Trust Safeguarding & Child Protection Policy**

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**Our schools are rights respecting schools. All our policies and procedures are written and reviewed to ensure that children’s rights, as detailed in the United Nations Convention on the Rights of the Child, are respected and promoted and this policy ensures:**

**Article 19:** All children should be protected from violence, abuse and neglect, and governments should protect them.

**Article 32:** Children should not be allowed to do work that is dangerous or might make them ill, or stop them going to school.

**Article 33:** Children have a right to be protected from dangerous drugs, and from the business of making or selling them.

**Article 34:** Nobody can do anything to your body that you do not want them to do, and grown-ups should protect you.

**Article 37:** No child should be punished in a way that humiliates or hurts them.

**Article 12:** All children have a right to be able to give their opinion when adults are making a decision that will affect them, and adults should take it seriously.

**Article 29:** Education should help children use and develop their talent and abilities. It should also help children learn to live peacefully, protect the environment and respect other people.

For more information on the convention and the rights of each child visit: <http://www.unicef.org.uk/>.

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# **THE THREE SAINTS ACADEMY TRUST**

## **SAFEGUARDING AND CHILD PROTECTION POLICY**

### **1. INTRODUCTION**

The duties imposed by Section 175 (Section 157 for Academies and Free Schools) of the *Education Act 2002* make explicit the responsibility of all to safeguard and promote the welfare of children as part of their common law duty of care towards the children for whom they are responsible and to work together with other agencies to ensure adequate arrangements within each school in our Trust identify, assess and support those children who are suffering, or likely to suffer, harm. This includes children missing from education, child on child abuse and risks outside the home. Duties also include seeking assurance appropriate safeguarding and child protection policies and procedures for any lease/hire agreements with external bodies is in place when using any school premises.

The responsibility for making sure arrangements are in place, in accordance with the guidance given by the Secretary of State lies with the Directors. [Keeping Children Safe in Education September 2024](#) Under the Trust's Scheme of Delegation each School's Committee has a Committee Member responsible for Child Protection / Safeguarding.

There are two aspects to safeguarding and promoting the welfare of children. They are that arrangements are in place:

- To take all reasonable measures to ensure that risks of harm to children's welfare are minimised, and
- To take all appropriate actions to address concerns about the welfare of any child, or children working together with the local authority's safeguarding partnership and the agreed policies and procedures in full partnership with other local agencies.

The arrangements that each school in our trust has in place will provide for both these aspects so safeguarding children's welfare.

The schools in our Trust carry out their own contextual analysis of the safeguarding issues and pressures that they predominantly face ranging from parental substance misuse, mental health issues, cost of living crisis, poverty and its impact on family life, domestic abuse, criminal activities and public disorder.

The document entitled [Working Together to Safeguard Children December 2023](#) places a general duty on schools to work and cooperate with other agencies to safeguard and promote the welfare of children. The Three Saints Academy Trust is committed to doing this by having an open and honest transparent line of communication.

Each school's responsibilities are outlined in the statutory guidance to schools and colleges [Keeping Children Safe in Education September 2024](#)

This guidance document states that all education settings must have in place systems designed to:

- Prevent unsuitable people working with, or coming into contact with, children and young people within the setting;
- Promote safe practice and challenge poor or unsafe practice;
- Identify instances in which there are grounds for concern about a child / young person's welfare and take appropriate action to keep children / young people safe;

- Contribute to effective partnership working between all those involved with providing services for children.

## **KEY DEFINITIONS**

The Children Acts 1989, 2004 and Children and Social Work Act 2017 states a child is anyone under the age of 18.

### **Safeguarding and Promoting the Welfare of Children**

[Keeping Children Safe in Education 2024](#) states safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

### **Child Protection**

Is one part of safeguarding and promoting the welfare of children and refers to the activity that is undertaken to protect children who are suffering, or at risk of suffering significant harm.

### **Significant Harm**

- Significant harm can be defined as the ill treatment or impairment of health and development of a child or young person.
- Development includes physical, intellectual, emotional, social or behavioural development.
- Health includes physical and mental health.
- Ill-treatment includes sexual abuse and other forms of ill – treatment that are not physical. This is viewed from the perspective of normal behaviour for a child / young person of similar age and understanding.

### **General Principles**

The child's welfare is paramount.

All adults including volunteers maintain and demonstrate a mindset of "it could happen here" and "think the unthinkable".

All children have a right to a childhood free from abuse, neglect or exploitation.

The schools in the Trust have a zero-tolerance approach to sexual violence and sexual harassment and all staff receive additional training in this.

All members of staff have a responsibility to be mindful of issues related to children's safety and welfare and have duty to report and refer any concerns however "minor".

All adults (including supply staff and volunteers) demonstrate an understanding that safeguarding is everyone's responsibility.

Parents have a right to be informed in respect of any concerns about their child's welfare, or any action taken to safeguard and promote the child's welfare, providing this does not compromise the child's safety.

Children are best protected when professionals work effectively together. (*Working Together to Safeguard Children 2023*)

The Trust and each school within the Trust have robust systems in place that deter possible abusers and will manage effectively any allegations or concerns as they arise including supply staff, that may meet the harm threshold. There are procedures in place to manage low level concerns and allegations relating to adults in schools, which do not meet the harm threshold.

The Trust and each school committee take seriously their responsibility under section 175/157 of the Education Act 2022 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are adequate arrangements within our schools to identify, assess, and support those children who are suffering, or likely to suffer, harm. This includes child on child abuse and risks outside the home.

## **2. THE PURPOSE OF A SAFEGUARDING AND CHILD PROTECTION POLICY**

Each school in The Three Saints Academy Trust has an individual and bespoke Safeguarding and Child Protection Policy, which provides clear direction to staff and others about expected codes of behaviour in dealing with safeguarding and child protection issues. This policy also makes explicit the Trust's commitment to the development of good practice and sound internal school procedures. This ensures that safeguarding and child protection concerns and referrals may be handled sensitively, professionally and in ways, which support the needs of the child.

This policy will give clear direction to all stakeholders (including pupils, staff, parents, committee members, volunteers and visitors), about our expectations and legal responsibility to safeguard and promote the welfare of all children in our schools in line with current legislation, guidance and best practice.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action

This policy will be reviewed annually and may be amended from time to time. This policy applies to all teaching, non-teaching, School Committee members, supply and volunteer staff.

### **School Commitment**

We recognise that high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps all children, and especially those at risk of, or suffering from, abuse, exploitation and radicalisation.

Each school in the Three Saints Academy Trust will therefore:

- a) Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to. This is done through PSHE and RSE curriculum, assemblies, one-to-one and small group therapeutic support etc.
- b) Ensure that children know that there are adults in the school who they can approach if they are worried or are in difficulty. Children know they can speak with any school staff about any issues they are worried about.
- c) Included in the curriculum activities and opportunities for PSHE / Citizenship and RSE Curriculum which equip children with the skills they need to stay safe from abuse and which will help children develop realistic attitudes to the responsibilities of adult life, particularly with



regard to childcare and parenting skills. Throughout our curriculum we ensure our children understand how to be healthy, stay safe and feel safe and what to do when they do not, for example by the use of Well-being Ambassadors, Companions and the help box scheme within school to address concerns and access to the Need To Talk button via the school website, this ensures the children have the best opportunity for a successful life.

- d) Through PSHE, RSE, RE, SMSC and promoting British Values, the Trust provides an ongoing programme of support through the curriculum at an age appropriate level, to promote self-esteem and social inclusion, and to address the issue of child protection in the wider context of child safety in general.
- e) Ensure that wherever possible every effort will be made to establish effective working relationships with parents and colleagues from other agencies.

### 3. FRAMEWORK

Schools do not operate in isolation. The welfare of children is a corporate responsibility of the entire local authority, working in partnership with other public agencies, the voluntary sector and service users and carers. All local authority services have an impact on the lives of children and families, and local authorities have a particular responsibility towards children and families most at risk of social exclusion.’ [Working Together to Safeguard Children December 2023](#). The designated safeguarding lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. [When to call police guidance for schools and colleges NPCC](#) will help the designated safeguarding lead and deputies to understand when they should consider calling the police and what to expect when they do.

Safeguarding is the responsibility of all adults especially those working with children. The development of appropriate procedures and the monitoring of good practice are the responsibilities of local authority Safeguarding Partnership

The Safeguarding Partnership is made up of 3 partners including Clinical Commissioning Group (health), children’s social care and the police. The Local Authority Safeguarding Partnership website contains  
Definitions of abuse and indicators;  
Procedures for Safeguarding and multi-agency working including relevant contacts;  
Advice on good practice and policy making’  
Proforma’s for referral and record keeping.  
Procedures and Guidelines for Child Protection and Safeguarding Children  
Descriptions of Need (Threshold levels)

This policy has been written in accordance with the principles established by:

- [Education Act 2002](#)
- [Children Act 1989](#)
- [Children Act 2004](#)
- [Safeguarding Vulnerable Groups Act 2006](#), as amended by the [Protection of Freedoms Act 2012](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Childcare Act 2006](#); [Childcare \(Disqualification\) Regulation 2009 /2018](#)
- [Children and Families Act 2014](#)
- [Children and Social work Act 2017](#)
- Data protection Act 2018: General Data Protection Regulations (GDPR) 2018
- [Voyeurism Offences Act 2019](#)

and with reference to the following key documents:

- [Keeping Children Safe in Education September 2024](#)
- [Working Together to Safeguard Children December 2023](#)

- [Guidance for Safer Working Practice 2022](#)
- [Disqualification under the Childcare Act 2006 \(updated 2018\)](#)
- [Protecting Children from Radicalisation: The Prevent Duty, 2015](#)
- [EYFS Statutory Framework for Group and School Based Providers](#)
- [What to do if you're worried a child is being abused: Advice for Practitioners 2015](#)
- [Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers 2024](#)
- [Sharing Nudes and Semi Nudes: advice for education settings working with children and young people March 2024](#)
- [Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation](#)
- [Statutory guidance on FGM](#)
- [Searching, Screening and Confiscation: Advice for Schools 2022](#)
- [Behaviour in Schools: Advice for Headteachers and school staff Feb 2024](#)
- [Working Together to Improve School Attendance 2024](#)
- [When to Call the Police](#)
- [PACE Code C](#)
- [Statutory Guidance for Children Missing Education](#)
- [Filtering and Monitoring Standards for Schools and Colleges](#)

Further documentation and guidance can be found within Annex B of [Keeping Children Safe in Education September 2024](#)

## 4. ROLES AND RESPONSIBILITIES

All adults working with or on behalf of children have a legal responsibility to safeguard and promote the welfare of children. This means, that staff (including supply staff and volunteers) are required to take action to protect children from maltreatment, prevent impairment to children's physical and mental health or development and ensure that children grow up in circumstances with the provision of safe and effective care.

Therefore, all adults, including volunteers, working in or on behalf of the schools within The Three Saints Academy will:

- Demonstrate an understanding that safeguarding is everyone's responsibility
- Maintain and demonstrate a mindset of "it could happen here"
- Do all they can within the capacity of their role, to ensure that children are protected from harm
- Be fully aware of the importance of mental health in relation to safeguarding
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Be clear that children can abuse other children, that it can happen both inside and outside of school and will have received training on recognising the indicators and signs of child on child abuse.
- Demonstrate an understanding of the importance of challenging all inappropriate behaviours between peers, such as those listed within Keeping Children Safe in Education 2024.
- Do all they can within the capacity of their role, to ensure that children grow up in circumstances consistent with safe and effective care
- Do all they can within the capacity of their role, to ensure that children have the best outcomes
- Report cases of suspected abuse or concerns to the DSL. This will be done as soon as possible using CPOMS or the written concern form.
- Report lower level concerns to the Headteacher as per Low Level Concerns Policy
- Monitor all pupils, particularly those that are deemed vulnerable
- Report any concerns regarding adults conduct to the Headteacher.

- Be alert to emerging problems that may warrant Early Help support, particularly those identified in Part 1 of KCSIE. All staff should report emerging problems that may warrant early help intervention using CPOMS or the written concern form.
- Monitor all children absent from education or missing/absconding during the school day as this can be a sign of safeguarding concerns.
- All staff, if they have concerns, should act immediately and should always speak to the DSL or Deputy, recognising that early information sharing is vital in keeping children safe. In exceptional circumstances, staff will consider speaking to Social Care to discuss safeguarding concerns if the DSL is not immediately available as all staff are aware that ANYBODY can make a referral.
- **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. Each school's contact details are listed in Appendix 1.

All staff are aware of the signs of abuse and neglect and know what action to take if these are identified. All staff are aware of online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring. There are, however, key people within schools and the LA who have specific responsibilities under Safeguarding procedures.

Each school has a senior member of staff who is the Designated Safeguarding Lead (DSL) and at least one Deputy DSLs is identified.

### **The Designated Safeguarding Lead (DSL) and all Deputies (DDSLs)**

The designated safeguarding lead will take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place). This is explicit in their job description. The DSLs in each school of the Trust have the appropriate status and authority to carry out the duties of the post. Each school's DSL and DDSLs are listed on Appendix 1.

. The roles and responsibilities of the DSL are:

- To be fully conversant with the Local Authority and School Safeguarding Procedure
- To have a complete safeguarding picture and be able to advise individuals on any safeguarding concerns.
- To provide all staff with advice in regard to safeguarding.
- To ensure that appropriate action is taken in school and that the correct procedures are followed in all cases of suspected / actual abuse.
- To refer suspected cases, as appropriate, to the relevant body (children's social care duty and advice team, Channel programme, and/or police), and support staff to comply with their mandatory reporting duties in cases where FGM has been identified.
- To maintain a record of pupils in school who are on child protection plans and keep this updated as notification is received.
- To liaise with the relevant agencies and other professionals as appropriate to ensure that these children are monitored.
- To be able to keep detailed, accurate, secure written records of all concerns, discussion and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as children's social care or the PREVENT programme.
- To ensure representation and attend / participate in child protection conferences, core group meetings, early help meetings as appropriate or to ensure that another member of staff (who has a good knowledge of the circumstances) attends. In the rare occasion of no such person being able to attend, then to provide a report from school.

- Provide reports as required for meetings. If school is unable to attend a meeting, a written report will be sent. Reports will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting and in line with local authority timescales.
- To organise and monitor training / information as appropriate for all staff including online safety training as part of staff safeguarding and child protection training.
- To oversee the safe use of technology, mobile phones and cameras in Early Years settings.
- To be trained personally at a single and multi-agency level and to undertake refresher training as necessary.
- To attend LA cluster meetings/trainings on a regular basis.
- To hold safeguarding induction sessions for new staff and volunteers working across school.
- To refresh volunteers and all staff on initiatives and developments as the need arises.
- To ensure that the curriculum offers opportunities for raising pupil's awareness and for developing strategies for their protection.
- To ensure that staff are aware of how to avoid placing themselves at risk when dealing with pupils.
- take a holistic view to ensure wider environmental factors are considered which may be a threat to safety and welfare of children (Contextual Safeguarding)
- receive training in managing and responding effectively to incidents of child on child abuse, ensuring there is a clear acknowledgement and awareness by all stakeholders that it is happening, but may not be being reported
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them;
- The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children (2023). NPCC (2020). When to call the police (NPCC 2020) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- be available during school hours
- arrange cover of DSL role for any out of hours/out of term activities
- Promote the educational outcomes of children with a social worker and other pupils deemed vulnerable.
- Be responsible for the sharing of child protection and safeguarding information when a child moves to a new school within 5 days, in line with KCSIE and the local authority's STAR protocol.

The full responsibilities of the DSL are set out in [KCSIE September 2024](#) Annex C of– Role of the Designated Safeguarding Lead. All designated safeguarding leads and deputy safeguarding leads must read and comply with this.

## **The role of the Senior Management Team**

It is recognised that as Safeguarding is a shared responsibility at multi agency level, so it is within school. The DSL's will share decisions with the Senior Management Team. If the DSL's/Deputy DSL's are not available then the Senior Management Team should be consulted. In the unlikely event of the senior management team being unavailable or if a course of action is unclear then the Local Authority Children's Services Safeguarding Team should be contacted. Safeguarding will be an agenda item at every Senior Leadership Team meeting.

## **The role of the Directors and School Committee Members**

The Directors are aware of their role in overseeing the school's arrangements for safeguarding as set out in Part 2 of Keeping Children Safe in Education 2024. They are aware of the expectations for them to remedy any deficiencies in safeguarding systems without delay. They will review all safeguarding structures annually. The trust's safeguarding strategy document outlines key roles and responsibilities and timescales for information to be shared to relevant committees and forums.

The Nominated Safeguarding Director, Amy Bradley will monitor Trust's responsibilities around Safeguarding and will receive information from the CEO, Director of Safeguarding and Attendance and School Committee safeguarding representatives at the Chairs Forum

The Directors will nominate a named School Committee member to support the safeguarding systems in each school.

School Committee Safeguarding Representative will monitor school responsibilities around safeguarding (SCR, safeguarding training log, safeguarding data to identify school generic issues, check KCSIE & Policy declaration, check annual safeguarding audit actions) and feedback to School Committee and Chairs Forum.

Discussions with staff and School Committee members about how the school delivers safeguarding through curricular and extra-curricular activities, school policies and procedures. Such developments are included in the termly Headteacher's report and newsletters.

Ensure that school has robust IT filtering and monitoring systems in place and review their effectiveness to ensure standards are met.

Ensure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

Actions identified from the annual safeguarding audit to be addressed with the Headteacher and monitored by the School Committee representative.

Section 175/Section 157 Audit to be authorised by Directors

Attending safeguarding training led by the school and external agencies (training in safeguarding is held each year by the school)

Liaising with the named member of staff in school on a regular basis and providing feedback from such meetings for all Directors.

Receiving, and feeding back on, monitoring reports from the Designated Safeguarding Lead, detailing the number and type of incidents recorded in school.

Ensuring the Safeguarding Policy is reviewed and monitored annually

Ensuring that staff and School Committee members receive relevant training (including online training) at induction and regularly updated.

Where premises are rented or hired out to organisations or individuals to run community or extra-curricular activities, the school will ensure appropriate arrangements are in place to keep children safe. The Governors should seek reassurance that the provider has appropriate safeguarding and child protection policies in place (including inspecting them as needed). The guidance [Keeping Children Safe during Community Activities](#) details the safeguarding arrangements providers should have in place.

Ensuring sufficient time and resources are allocated to allow the DSL's to fulfil their responsibilities

Reporting back to the School Committee members/Directors as and when appropriate

Awareness of the importance of confidentiality.

School Committee members will not investigate concerns and allegations, ask for information about individual children or cases, act independently or create unnecessary work for staff.

## **CEO**

The CEO has responsibility for overall Trust strategy of safeguarding and attendance. Line management of DSL's (Headteachers) and the Director of Safeguarding and Attendance and receives monitoring information to assess the effectiveness of strategy.

## **Director of Safeguarding and Attendance**

Feeds into the overall strategy of safeguarding and attendance via CEO and has responsibility for safeguarding training of all staff and governance in Trust. The DSA monitors the effectiveness of Trust strategy, policy and procedures. The DSA chairs 2 safeguarding forums that are held termly, one for DSLs and one for FSWS and also provides supervision in each school.

## **5. EARLY YEARS FOUNDATION STAGE**

The Three Saints Academy Trust considers the safe use of any devices owned by all the trust schools. We recognise mobile phones and tablets can be valuable resources for taking photographic and video images of pupils for teaching and learning purposes, to record progress or to celebrate achievement. However, we understand that settings must set out a clear policy to ensure the appropriate use of any Early Year's devices and this should be used in conjunction with the online safety and acceptable use IT policies.

## **6. TRAINING AND SUPPORT**

The Three Saints Academy Trust ensures that the Designated Safeguarding Leads, Deputy DSLs, all staff and the School Committee members attend training relevant to their role.

All staff, committee members, directors and volunteers will have access to safeguarding training including online training which is relevant and appropriate to their role on induction. This includes training in procedures to follow, signs to note and appropriate record keeping. All staff, whether paid or unpaid, have access to appropriate training in order that they are able to react appropriately if an incident should occur. Refresher training is every year for all staff, committee members and volunteers and at bi-annually for designated staff with at least annual updates. E-bulletins and regular updates via Staff Meetings will take place when required during the school year.

ALL staff, volunteers, committee members and directors will read and show an understanding of any updates that are provided, including those related to Keeping Children Safe in Education 2024.

All staff are trained to recognise and respond to situations where a child may be considered to be at risk. The Designated Lead, Deputy DSLs are the nominated staff, and are responsible for the implementation of appropriate procedures.

Staff will be informed of any changes to current safeguarding issues through staff meetings. Any new School Committee members to the school will automatically be asked to complete training in safeguarding as well as online safety as part of their induction to the role.

All training is logged by the DSL and copies of certificates are held on file. The log outlines when training is due for renewal.

Directors and school committee members training logs are held by the Trust Governance clerk.

## 7. PROFESSIONAL CONFIDENTIALITY

Confidentiality is an issue which is discussed and fully understood by all those working with children, particularly in the context of safeguarding. The only purpose of confidentiality in this respect is to benefit the child. Only staff with direct responsibility for children will be privy to individual safeguarding information.

All staff and School Committee members and parents when appropriate are regularly reminded of the importance of confidentiality.

Confidentiality is respected through:

All records are stored electronically on CPOMs with password protected access to designated staff. Where paper records are held they are stored in a lockable filing cabinet in an office locked when unoccupied.

Ensuring information exchanged between professionals in school/ other agencies is kept between those directly involved with the child/family

Ensuring that if a child transfers school, confidential records will be transferred within 5 days in line with *KCSIE 2024* guidance and local authority STAR protocol.

It must be remembered however that the child's welfare is paramount and takes precedence over all other considerations. If a child is deemed to be at risk of significant harm, then referrals to Children's Social care must be made. In the case of disclosure of abuse, staff are advised never to promise a child that they will keep it a secret as this may well inhibit action being taken which would be in the child's best interest.

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the courts.

Any disclosure of personal information to others, [including to children's social care], must always, however, have regard to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (*Data Protection Act 2018, GDPR Regulations*). Consent should be obtained before sharing personal information with third parties, however in some circumstances, obtaining consent may not be possible or in the best interest of the child. The safety and welfare of that child necessitates that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt.

### **Professional Challenge, Escalation and Resolution**

At the Three Saints Academy we promote a culture which encourages constructive challenge within our organisation and between organisations; acknowledging the important role that challenge can play in safeguarding children.

If any member of staff is unhappy with the response they have received in relation to a safeguarding concern they have raised, it is their responsibility to ensure they professionally challenge and or escalate their concern.

Where professional disagreement occurs and the DSL/DDSLs are unhappy with the actions or decisions of another agency, they will need to professionally challenge. The disagreement can often be resolved by discussion and negotiation between the practitioners involved. A record of the professional challenge should be recorded on CPOMs with the outcome. If efforts are unsuccessful and no resolution agreed to achieve better outcomes the DSL/DDSLs must escalate their concern using the local authority's escalation/resolution policy.

## **8. STAFFING**

### **Single Central Record**

Holding a single central record is a statutory requirement. The Three Saints Academy has an online MAT SCR. Each school has access to their own online SCR. This record includes all staff, supply staff, regular visiting staff such as peripatetic teachers and regular volunteers. The SCR is monitored regularly by the Headteacher of each school along with the Chair of the School Committee. The CEO and the Director of Safeguarding and Attendance check the Headteacher's monitoring of the SCR as part of the trust annual audit.

### **DBS Procedures for MAT Staff and Directors**

Procedure for central staff/directors/members visiting schools:

School staff should check that the person has been entered onto Inventory as DBS checked. This is confirmation that the Trust has carried out all necessary checks and they are included on the MAT SCR.

If they have not been entered onto the Inventory system the school should contact the Trust central HR staff (Chief Finance Officer or HR Administrator) to confirm if the necessary checks have been carried out.

### **Safer Recruitment**

The Three Saints Academy follows part 3 of 'Keeping Children Safe in Education 20234 and pays full regard to 'Safer Recruitment' requirements including but not limited to:

- verifying candidates' identity and academic or vocational qualifications
- obtaining professional and character references
- checking previous employment history and ensuring that a candidate has the health and physical capacity for the job,
- UK Right to Work
- clear enhanced DBS check
- any further checks as appropriate to gain all the relevant information to enable checks on suitability to work with children, including an online search for shortlisted candidates.
- Shortlisted candidates will be informed that an online search will be completed as part of due diligence checks.
- For individuals who have lived or worked outside the UK, in addition to the same checks as all other staff, the school will complete any additional checks required to satisfy themselves that the individual is suitable to work with children. This may include obtaining a letter from the professional regulatory authority in the country (countries) in which the candidate has worked confirming that they have not imposed any sanctions or restrictions, and/or that they are aware of any reason they are unsuitable to teach where possible.

Evidence of staff member's identity (including a birth certificate where possible), required qualifications and the right to work in the UK will be kept in individual personnel files.

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils.



Central Team staff and senior leaders in each school in the Trust have undertaken Safer Recruitment training which is renewed every 3 years.

Covering letters will be obtained from agencies and other employers that provide staff to work in school to confirm that appropriate checks have been undertaken. Individual identity checks will be undertaken on these staff to ensure they are employees of the named agency/employer. This also includes checking when agency staff have last undertaken safeguarding training.

A transfer of control agreement will be used where other agencies/organisations use school premises and are not operating under school's safeguarding policies and procedures, in line with the updated guidance within Keeping Children Safe in Education 2024 Paragraphs 169 and 170.

## **Induction**

Our staff induction process will cover:

- The Safeguarding & Child Protection policy
- The Online Safety Policy (previously known as 'e-safety')
- The Behaviour and Relationships Policy
- The Staff Code of Conduct
- The safeguarding response to children who go missing from education
- The role of the DSL (including the identity of the DSL and any deputies)
- Whistleblowing Policy

Copies of all these policies and a copy of part one of KSCIE and Annex B are provided to staff at induction.

## **Allegations or Concerns Raised Against School Staff, Supply Staff and Other Adults in School**

The Three Saints Academy Trust follows the guidance set out in Part 4 of 'Keeping Children Safe in Education 2024', covering both levels of allegations and concerns:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – referred to as 'low level concerns'.

Allegations that may meet the harm threshold are defined as when it is alleged the adult has:

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

In these instances, the school will follow the guidance within KCSIE Part 4 Section One, in line with each local authority's LADO procedures.

Where no further action is taken, the case manager (Headteacher or CEO) and the LADO will:

- record the decision and justification for it; and,

- agree on what information should be put in writing to the individual concerned and by whom.

If a school receive an allegation relating to an incident that happened when an individual or organisation was using our premises for the purpose or running activities for children (for example community groups, sports providers etc). As with any safeguarding allegation the school will follow our safeguarding policies and procedures including informing the LADO.

## Low Level Concerns

As part of The Three Saints Academy's approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the schools (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which **all** concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. By doing so, it will encourage an open and transparent culture; enabling the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our institution.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of a school in the trust may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is otherwise not considered serious enough to justify a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of our schools from potential false allegations or misunderstandings. It also ensures that the values and expected behaviour which are set out in our staff code of conduct are constantly lived, monitored and reinforced by all staff.

Through training, thorough induction, exit interviews and other opportunities we can:

- ensure our staff, volunteers and other adults in our schools 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;
- empower staff to share any low-level safeguarding concerns with the Headteacher;
- 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; and,
- help identify any weakness in our safeguarding systems.

The Headteacher will respond to any low-level concerns in line with the guidance set out within Keeping Children Safe in Education Part 4 Section 2, the school's Staff Code of Conduct, and their Low-Level Concerns Policy.

## **Whistleblowing**

All staff at The Three Saints Academy are aware of their duty to raise concerns, where they exist, which may include the attitude or actions of colleagues. The trust's Whistleblowing Policy is there to support and aid them in these circumstances. The whistleblowing policy is shared with all staff, volunteers and committee members at induction, and available to all via the trust's website.

Whistleblowing regarding the Headteacher should be made to the Chief Executive Officer or the Chair of the School Committee, whose contact details are readily available to staff.

Should the situation arise where a member of staff feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, advice can be sought via the NSPCC helpline or through OFSTED's Whistleblowing helpline. The contact details are: -

NSPCC Telephone number - 0800 028 0285. Email – [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

OFSTED Whistleblowing helpline Telephone number - 0300 1233155

Email – [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

## **Health and safety, risk assessments and visitors**

Day-to-day responsibility for health and safety issues in each school is the responsibility of each Headteacher in each school.

See the school's Health and Safety Policy for further details.

The Three Saints Academy is committed to keeping pupils safe by ensuring that visitors to school do not pose a risk to children at our schools. Each school therefore ensures that:

- Visitors to school sign in using the Inventory system and wear an identification sticker to indicate they have done so
- ALL staff and children, where appropriate, will challenge visitors to school who are not wearing correct identification
- Visitors sign out and remove/hand in their identification when they leave the school
- Visitors are made aware of who to speak to if they are worried about a child during their visit and handed the Safeguarding Visitors leaflet.
- Visitors are accompanied during their visit, when children are present, unless they have undergone relevant checks and these are accepted and verified by the Headteacher. If unsupervised they will also be provided with a summary of key safeguarding, behaviour and code of conduct expectations.
- Visitors will behave in a way that is compliant with the school's code of conduct
- Visitors will not use mobile phones or other similar electronic devices during their visit unless agreed by the Headteacher or DSL.

- Visitors will not initiate contact or conversations with pupils unless this is relevant and appropriate to the reason for their visit
- When there are several visitors to the school at the same time (such as for an assembly etc.) there will be adequate staff supervision of children and visitors. A risk assessment will be undertaken if deemed necessary or appropriate
- When visitors are undertaking activities with children, content of the activity will be agreed with the Headteacher, prior to the visit.
- Contractors will be managed in line with the school's Health and Safety policy.

## **Alternative Provision**

Where a pupil is placed in Alternative Provision, the school continues to be responsible for the safeguarding of their pupil.

The school will request and receive written confirmation from the provider that appropriate safeguarding checks have been carried out on individuals.

## **9. RECORDS AND MONITORING**

Well-kept records are essential to good safeguarding practice. The trust is clear about the need to record any concerns held about a child or children within a school, the status of such records and when these records should be passed over to other agencies. Records, policies and procedures are monitored in each school regularly when the Director of Safeguarding and Attendance undertakes the annual Safeguarding Audit. Individual case file audits will be undertaken in each school by the Director of Safeguarding and Attendance.

Teaching staff and safeguarding staff record concerns and any other relevant information onto the CPOMS system direct. Support staff, supply staff, visitors and volunteers report any concerns verbally and record them onto concern form and hand either directly to the class teacher or the DSL /DDSL. All records are held on each school's CPOMS system.

- DSLs will ensure detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions are kept. This should include instances where referrals were or were not made to another agency such as children's social care or the PREVENT programme.
- There is an agreed format for reporting all matters relating to child wellbeing and records are maintained by the DSL/DDSLs including any actions and decisions and outcomes recorded.
- All staff use the agreed format.
- Concerns are factual and evidence based.
- DSLs will record evidence of child's wishes, professional challenge, offers of early help and multi-agency working.
- Each school has a school safeguarding inbox which is monitored by the DSL/DDSLs, this enables secure effective information sharing with agencies.

### **Transfer of Records**

- A pupil's safeguarding file will be transferred, in its entirety, to the educational establishment where the child moves to, unless there is ongoing legal action, within 5 working days of admission, in line with KCSIE 2024 and the local authority STAR Protocol
- The safeguarding file will be sent via CPOMS transfer where the school has CPOMS or a downloaded pdf file sent via secure email (Egress) to the DSL at the receiving school.

- A receipt will be obtained at time of transfer for non-automatic transfers and the responsibility for the safeguarding records will pass to the receiving school.
- The educational establishment where the pupil attends at statutory school leaving age (18) will securely retain the safeguarding records until the child's 25<sup>th</sup> birthday. Safeguarding records will then be destroyed securely

Schools will seek advice from the Trust's DPO in respect of any requests for information

## **19. SUPERVISION**

Safeguarding team staff receive supervision on a weekly basis in respect of safeguarding issues within their team, however formal supervision is undertaken by the Director of Safeguarding and Attendance, headteachers will also receive case supervision during case file audits. See Supervision Policy.

## **11. OTHER RELEVANT POLICIES**

This policy should be read in conjunction with the following Trust and school's policies:

- Whistleblowing Policy
- Staff Code of Conduct
- Low Level Concerns Policy
- Safer Recruitment and Retention Policy
- Behaviour and Relationships Policy
- Anti-Bullying Policy
- Use of Physical Intervention / Restraint Policy
- First Aid / Medications Policy / Intimate Care Policy
- Drugs and Substance Misuse Policy
- Attendance Policy
- Mental Health and Well-being Policy
- RSE/PHSE Policy and Curriculum
- Online Safety and Acceptable Use Policies
- Educational Visits Policy
- Health and Safety Policy
- EYFS Policy

## Appendix 1 – Contact Details

Central Team	Name	Contact Details
CEO	Kirsty Tennyson	<a href="mailto:Kirsty.Tennyson@three-saints.org.uk">Kirsty.Tennyson@three-saints.org.uk</a>
Chair of Directors Safeguarding Director	Amy Bradley	<a href="mailto:Amy.Bradley@three-saints.org.uk">Amy.Bradley@three-saints.org.uk</a>
Director of Safeguarding and Attendance	Linda Smith	<a href="mailto:Linda.Smith@three-saints.org.uk">Linda.Smith@three-saints.org.uk</a>

School:	INDIVIDUAL SCHOOL ADD OWN CONTACTS	
Role/Agency	Name	Contact Details
Headteacher and Designated Safeguarding Lead		
Designated Mental Health Lead		
Deputy Designated Safeguarding Lead		
Deputy Designated Safeguarding Lead		
PREVENT SPOC		
CLA/LAC & Post CLA/LAC Designated Teacher		
Operation Encompass SPOCS		
SENDCO		
Chair of School Committee and Child Protection Committee Member		
School Attendance Officer		
School Nurse/Nursing Team		
Social Care Contact Centre (each relevant LA to be listed)		
Out of Hours Duty Team		
LADO		
Virtual Head Looked After Children		
SCIE Officer		
Early Help Partnership Manager		

Early Help Partnership Coordinators		
Education Welfare Service Children Missing in Education		
PREVENT Regional (Northwest) Coordinator (RPECS)	<a href="#">Contact Form for RPEC</a>	
Head of Young Carers Service		
Police Emergency		999
Non-Emergency		101
Forced Marriage Unit	<a href="mailto:fmf@fco.gov.uk">fmf@fco.gov.uk</a>	020 7008 0151 (Monday to Friday 9-5pm) Out of hours: 020 7008 1550 (Global Response Centre)
Police Channel Team Coordinator		
Police Channel Team		
National Anti-Terrorist Hotline	<a href="https://www.npcc.police.uk/CounterTerrorism/Prevent.aspx">https://www.npcc.police.uk/CounterTerrorism/Prevent.aspx</a>	0800 789 321
NSPCC Helpline		0808 800 5000
NSPCC 24-hour FGM Helpline	<a href="mailto:fgmhelp@nspcc.org.uk">fgmhelp@nspcc.org.uk</a>	0800 028 3550
NSPCC Whistleblowing Helpline	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	0800 028 0285
NSPCC Modern Slavery Helpline		0800 0121 700
National Domestic Abuse Helpline		0808 2000 247 (24 hrs)
Operation Encompass Teachers National Helpline		0204 513 9990 8-11am Mon-Fri

# Appendix 2 – KCSIE Part 1 – September 2024

[Keeping Children Safe in Education Part 1 - September 2024](#)



# Appendix 3 – KCSIE Full Document September 2024

[Keeping Children Safe in Education September 2024](#)

# Appendix 4 - Definitions of Abuse, Neglect and Exploitation

## Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

## Physical Abuse

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

## Emotional Abuse

The **persistent** emotional maltreatment of a child such as to cause severe and 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, though it may occur alone

## Neglect

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

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

## **Sexual Abuse**

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

All staff are aware that child sexual and child criminal exploitation are forms of child abuse. See Appendix 6.

# Appendix 5 – Safeguarding Children

## Early Help

The schools in our trust are committed to providing our families with the right help at the right time. Any child may benefit from early help, but ALL school staff should be particularly alert to the potential need for early help for a child who:

- is disabled 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;
- has experienced multiple suspensions, is at risk of being permanently excluded from school and in Alternative Provision or a Pupil Referral Unit;
- may experience discrimination due to their race, ethnicity, disability, religion, gender identification, sex or sexual orientation.
- Has a parent or carer in custody, or is affected by parental offending;
- Has English as an additional language.
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is at risk of so-called “honour” -based abuse such as Female Genital Mutilation or Forced Marriage;
- is in a family circumstance presenting challenges for the child, such as temporary accommodation, substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is in care, previously looked after or any child not growing up with their birth family;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child;
- whose parents have expressed an intention to remove them from school to be educated at home;
- is absent from education;
- is an asylum seeker;
- any other identified reason not listed above that requires extra support or intervention to improve outcomes for families and children including mental health support.

We therefore ensure that:

- ALL staff and volunteers can identify the risk factors that indicate a family or pupil may benefit from Early Help;
- All staff and volunteers understand that children with additional needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.
- ALL staff and volunteers will use the school's agreed format for letting the DSL know about Early Help requirements
- DSLs will undertake an early help assessment, when appropriate, to identify what Early Help is required. An early help plan will be formulated which is an outcomes focused assessment tool. Early help is whereby staff can identify a child's needs early, assess those needs holistically, deliver coordinated services and review progress. Early help plans are designed to be used when:
  - A member of staff is worried about how well a child is progressing (e.g. concerns about their health, development, welfare, behaviour, progress in learning or any other aspect of their wellbeing)
  - A child or their parent/carer, raises a concern with a member of staff
  - A child's needs are unclear, or broader than the member of staff's service can address

In order to best support children and families, each school will participate fully in the Early Help process and will take on the role of lead professional, where appropriate. To support this, each school will ensure that a member(s) of staff is fully trained to use each local authority's early help systems.

The Early Help process is entirely voluntary and informed consent of parents or young person, where they are able to provide consent, is mandatory. Each school recognises that should a family not provide consent, this may require a review of the Level of Need, as refusal to provide consent may increase the risk to the child and subsequent consultation with social care may be required.

The Early Help Teams in each local authority develop and maintain strong links to universal services, offer named link workers to key services, direct family support and offer support advice and guidance to professionals.

## **Child in Need and Child Protection Procedures**

The Three Saints Academy is committed to PREVENTING abuse, PROTECTING children from abuse and SUPPORTING those involved in cases of abuse. We therefore ensure that:

- ALL staff and volunteers understand the importance of teaching children how to keep themselves safe from all types of abuse, including child on child and domestic abuse.
- ALL staff and volunteers seek out opportunities that are relevant to their role, to teach children the skills to keep themselves safe
- ALL staff and volunteers make and maintain positive and supportive relationships with children which enable children to feel safe and valued
- Safeguarding has a high status throughout school by being on the agenda at staff meetings/briefings, information being readily available on notice boards, regular updates and training.
- ALL staff and volunteers feel confident in approaching DSLs to raise concerns
- ALL staff and volunteers understand the four categories of abuse; NEGLECT, EMOTIONAL ABUSE, SEXUAL ABUSE, PHYSICAL ABUSE.

- ALL staff and volunteers understand that there are other ways in which children can be abused such as; Child on Child Abuse, Online, Child Criminal Exploitation (Including through County Lines), Child Sexual Exploitation, Female Genital Mutilation, Honour Based Abuse, Radicalisation, Trafficking, Slavery, Forced Marriage, Domestic Abuse (as either a direct victim or witness) and others
- ALL staff and volunteers have the knowledge, skills and expertise to recognise the signs and symptoms of all types of abuse
- All staff, if they have concerns, know these should be acted on immediately: early information sharing being vital in keeping children safe. In exceptional circumstances staff should consider speaking to a member of SLT or Social Care to discuss safeguarding concerns if the DSL or deputy is not immediately available.
- DSLs keep up to date with emerging and specific safeguarding issues and update training accordingly
- DSLs update staff and volunteer's knowledge and understanding of such issues in order for them to be able to identify children who are at risk of such specific safeguarding issues
- ALL staff and volunteers will maintain and demonstrate an attitude of "it can happen here"
- ALL staff and volunteers are child-centred in their practice and act in the best interests of the child at all times
- ALL staff recognise and understand that behaviour can be a child's way of communicating distress and changes to behaviour may be an indicator of abuse.
- All staff are aware that children may not feel ready or know how to tell someone about their worries/concerns.
- Staff should be professionally curious.

## **Responding to Disclosures and Referrals to Children's Social Care**

ALL staff and volunteers have the skills to respond appropriately and sensitively to disclosures or allegations of abuse. Staff, committee members, volunteers and other adults working in school know they must:

- Listen and keep calm. Do not interrupt
- NOT promise the child that you will keep the matter confidential. Explain to the child who you will need to tell and why
- Observe visible bruises and marks, but do not ask a child to remove or adjust their clothing to view them
- Keep questions to a minimum as your role is not to investigate. If you need to ask questions in order to ascertain whether this is a safeguarding concern, ensure they are open questions
- Use the "TED" model for asking open ended questions: "Tell me about that", "Explain that to me", "Describe that"
- Make a record of what has been said immediately afterwards in words used by the child and yourself to the best of your memory. Use capital letters for the child's words to help distinguish between the two.
- Note anything about the child which is connected i.e. any visible injuries including the position and description, the demeanour of the child i.e. crying, withdrawn etc.
- Clearly indicate whether fact, opinion or third-party information
- Report the matter immediately to the Designated Safeguarding Lead
- If in doubt, seek advice from the Designated Safeguarding Lead

### **They will not:**

- Ask leading questions, put words into the child's mouth or press for details
- Rush the child
- Examine the child
- Investigate
- Promise confidentiality
- Summarise or use your own words to describe events
- Delay sharing the information with the Designated Safeguarding Lead
- Take photographs of any marks or bruises

In addition, though, all staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

All members of the school community have a statutory duty to safeguard and promote the welfare of children and young people. If any member of the school community has a safeguarding concern regarding a child, they should contact the Designated Safeguarding Lead without delay. Staff and committee members should not investigate possible abuse or neglect themselves.

Injuries noted should be reported to the Designated Safeguarding Lead immediately and without delay as it is acknowledged that once an injury occurs, the body will start to heal and therefore evidence will start to diminish.

The Designated Safeguarding Lead will consider the information they have received and will determine what action should be taken by the school. He/she will refer to the local authority's Levels of Need framework to aid this decision making (see Appendix 10). He/she must record the outcome of this decision-making process.

If the Designated Safeguarding Lead is unsure as to whether the presenting concern reaches the threshold for referral to Children's Social Care they should contact the Children's Social Care for advice.

Children's Social Care contact details can be found in Appendix 1 - Contacts

If the Designated Safeguarding Lead feels that the concern should be addressed via the Early Help Level 2 or Levels 3 or 4 (Child in Need and Child Protection), then they should contact the child's parent(s) to request consent to proceed. If the parent(s) refuses to give consent, the Designated Safeguarding Lead should consider how to proceed, including if refusal increases the risk of harm to the child. (If required, appropriate translation will be provided, avoiding the use of family or local community members.)

Where the Designated Safeguarding Lead feels that the information indicates that a child is in need of protection (Level 4 – Section 47 only), they should still contact the parent(s) to inform them that they are making a referral to Children's Social Care and to gain consent, unless to do so would place the child at increased risk of harm; for example:

- where sexual abuse involving a family member is suspected or disclosed
- where fabricated or induced illness is suspected
- where to do so would impede an existing criminal investigation

The Designated Safeguarding Lead and/or Deputy will complete, in detail, the Children's Social Care referral form (available on the local authority's Children and Young People Safeguarding Partnership website). They will include as much detail as possible relating to the child, immediate and wider family, the allegation of harm, situation, context, environment, risks and protective factors to enable Children's Social

Care to react in a timely way. This referral form must be completed within a maximum of 48 hours but sooner when requested.

If the school does not receive an outcome to their referral from Children's Social Care within one working day, the Designated Safeguarding Lead should contact Children's Social Care immediately.

If the referral results in an Assessment and a period of Child in Need (Level 3) or Child Protection (Level 4), or an Early Help (Level 2) assessment and plan, the Designated Safeguarding Lead and/or Deputy will engage thoroughly with the relevant assessment and resulting plan. This includes Strategy Meetings, Initial and Review Child Protection Conferences, Core Group Meetings and other CP meetings.

The DSL or a Deputy DSL will attend Child Protection meetings, produce and present reports, liaise with staff, work with parents, work with other agencies and ensure the voice of the child is evidenced throughout these processes.

The DSL and Deputy/ies meet regularly to ensure that decisions made about children who are subjects of Child Protection Plans are agreed and a clear rationale for the decision is documented.

A copy of the child's CP Plan is included in the child's individual safeguarding file on CPOMS.

Staff are offered appropriate support and/or supervision that is relevant to their role or involvement in particular cases.

Communication and work with parents and carers will always be undertaken in a supportive manner and in the best interests of the child.

ALL staff understand that children who perpetrate abuse or display harmful behaviour (including harmful sexual behaviours) should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported.

Specific programmes of intervention and support are offered to children and families who are vulnerable.

Risk Assessments will be undertaken where a child's behaviour poses a risk to others, themselves or the environment. Other local authority assessment tools will be completed as and when appropriate



## Appendix 6 – Specific Areas of Safeguarding

ALL staff and volunteers understand that there are specific and emerging ways in which children can be abused and are aware of these specific issues; reporting any concerns in the appropriate manner to the DSL.

Further information on specific areas of safeguarding can be found within Part 1 of Keeping Children Safe in Education 2024 and Annex B.

### **Absent from education, persistently absent pupils and pupils electively home educated**

When a child is absent from education particularly repeatedly and/or for prolonged periods, or persistently absent this can be a vital warning sign of a range of safeguarding possibilities. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. All the schools in the Three Saints Academy closely monitor school attendance to identify any pupils who are absent from education. All staff are aware of the procedures and our graduated response to support pupils and families.

'Children Missing Education' (CME) are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education other than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Schools have a safeguarding duty in respect of their pupils, and as part of this should investigate any unexplained absences.

When a child is deemed to be missing from education, schools must make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register.

Once these enquiries have been undertaken, the local protocol for Children Missing Education must be followed.

Pupils at particular risk of CME:

- Pupils at risk of harm/neglect  
Children may be missing from education because they are suffering from abuse or neglect. Where this is suspected school should follow the local child protection procedures
- Children of Gypsy, Roma and Traveller (GRT) families  
Research has shown that many children from these families can become disengaged from education, particularly during the secondary school phase. It is therefore important that schools inform the local authority when a GRT pupil leaves the school without identifying a new destination school, particularly in the transition from primary to secondary so that they can attempt to facilitate continuity of the child's education
- Children of Service Personnel

Families of members of the Armed Forces are likely to move frequently – both in the UK and overseas and often at short notice

- Missing children and runaways

Children who go missing or run away from education, home or care may be in serious danger and are vulnerable to crime, sexual exploitation or abduction as well as missing education

- Children and young people supervised by the Youth Justice System

Children who have offended or are at risk of doing so are also at risk of disengaging from education

- Children who cease to attend a school

There are many reasons why a child stops attending a school. It could be because the parent chooses to home educate their child. However, where the reason for a child who has stopped attending a school is not known, the local authority should investigate the case and satisfy itself that the child is receiving suitable education.

- Children of new migrant families

Children of new migrant families may not have yet settled into a fixed address or may have arrived into the local area without the Local Authority becoming aware, therefore increasing the risk of the child missing education

Elective

## **Child on Child Abuse**

All staff receive training on child on child abuse.

We have adopted a 'whole school approach' to tackling sexism and child on child abuse (including sexual violence and sexual harassment).

We fully understand that even if there are no reports of child on child abuse in school it may be happening. As such, all our staff and children are supported to:

- be alert to child on child abuse (including sexual harassment);
- understand how the school views, records and responds to child on child abuse
- stay safe and be confident that reports of such abuse will be believed, taken seriously and acted upon.

We will not tolerate instances of child on child abuse and will not pass it off as "banter", or "part of growing up".

We will recognise that "child on child abuse" can occur between and across different age ranges.

We will follow both national and local guidance and policies to support any **child** subject to child on child abuse.

We will follow the guidance on managing reports of child on child sexual violence and sexual harassment in schools in line with Part 5 of Keeping Children Safe in Education 2024.

Child on child abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others. This includes:

- Bullying (physical, name calling, homophobic, etc., including cyber bullying)

- Gender based violence
- Sexually harmful behaviour, including 'upskirting' and sexting including "cyber-flashing"
- Abuse in intimate personal relationships between children
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment
- Causing someone to engage in a sexual activity without consent
- Consensual and non-consensual sharing of nude and semi-nudes images
- Initiation/hazing type violence and rituals.

This abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, culture, sexual identity, disability, special educational needs or other differences and can result in significant, long lasting and traumatic isolation, intimidation or violence to the victim.

### Recognising and responding to child on child abuse

Stopping violence and ensuring immediate physical safety is the first priority of any education setting, but emotional bullying can sometimes be more damaging than physical. An assessment of an incident between two (or more) children should be completed and consider the following:

- Chronological and developmental ages of everyone involved
- Difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability
- All alleged physical and verbal aspects of the behaviour and incident
- Whether the behaviour involved inappropriate sexual knowledge or motivation
- What was the degree of physical aggression, intimidation, threatening behaviour, coercion or bribery?
- The effect on the victim
- Any attempts to ensure the behaviour and incident is kept a secret
- The child or young person's motivation or reason for the behaviour, if they admit that it occurred
- Whether this was a one-off incident, or longer in duration

Children or young people who harm others may have additional or complex needs e.g.:

- Significant disruption in their own lives
- Exposure to domestic abuse or witnessing or suffering abuse
- Educational under-achievement
- Involved in crime

It is important to develop appropriate strategies in order to prevent the issue of child on child abuse rather than manage the issues in a reactive way. Even with the most stringent of policies and support mechanisms, child on child abuse can and may still occur. In order to try to prevent this schools in our trust will:

- Have an ethos where students and staff treat each other with respect and understand how their actions affect others
- Ensure that the school environment is one that allows students to share information about anything that is upsetting or worrying them
- Use a strong and positive PSHE curriculum to tackle issues such as prejudiced behaviour, and gives an open forum for young people to talk
- Openly discuss any issues that could motivate bullying with staff and students
- Address issues early between pupils which might later provoke conflict
- Develop strategies to help to prevent bullying
- Involve students and parents to ensure they know what to do to prevent and report concerns
- Create an inclusive, safe environment where pupils can openly discuss issues without fear
- Invest in skills to help staff understand the needs of SEND, disabled and lesbian, gay, bisexual and transgender pupils through staff training and CPD to ensure that staff do not dismiss issues
- Work with the wider community and agencies to tackle issues that occur outside the setting

## **Remote Learning**

There may be occasions where the school will need to implement a 'remote learning' approach to education. This might be due to health reasons, such as periods of 'self-isolation', or when extreme weather prevents the school from fully opening.

During times of partial closure, priority will be given to those pupils identified as being vulnerable.

Vulnerable children and young people include those who:

- are assessed as being in need under section 17 of the Children Act 1989, including children and young people who have a child in need plan, a child protection plan or who are a looked-after child;
- have an education, health and care (EHC) plan;
- have been identified as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued full-time attendance, this might include:
  - children and young people on the edge of receiving support from children's social care services or in the process of being referred to children's services
  - adopted children or children on a special guardianship order
  - those at risk of becoming NEET ('not in employment, education or training')
  - those living in temporary accommodation
  - those who are young carers
  - those who may have difficulty engaging with remote education at home (for example due to a lack of devices or quiet space to study)
  - care leavers

- others at the provider and local authority’s discretion including pupils and students who need to attend to receive support or manage risks to their mental health.

Schools within The Three Saints Academy Trust will continue to work with and support children’s social workers to help protect vulnerable children during any time of partial or full closure. This includes working with and supporting children’s social workers and the local authorities virtual school head for looked-after and previously looked-after children. The lead person for this will be the DSL.

In circumstances where a parent is hesitant about or does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and DSL will explore the reasons for this directly with the parent.

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per this policy and where appropriate referrals should still be made to children’s social care and as required, the police.

Online teaching should follow the same principles as set out in The Three Saints Academy’s code of conduct and in line with Guidance for Safer Working Practice and Safeguarding and remote education guidance and Providing remote education : guidance for schools.

## **Child Criminal and Sexual Exploitation**

### **Child Sexual Exploitation**

Child Sexual exploitation (CSE) is sexual abuse of a child. The definition of Child Sexual Exploitation is:

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

Like all forms of child sexual abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person’s immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts, or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- unknown adults collecting the children from school
- having older boyfriends or girlfriends
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- repeat absences / truancy from school (e.g. same time of day, same day each week, etc.)
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- frequent missing from home episodes
- getting involved in crime, police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault

## **Child Criminal Exploitation**

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Child Criminal Exploitation;

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

A typical feature of this form of exploitation is “County Lines” criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from one area to another, typically from urban areas to suburban and rural areas, market and seaside towns.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRM) should be considered. Like other forms of abuse and exploitation, county lines exploitation:

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of exploitation. Signs include:

- Persistently going missing from school or home and / or being found out-of-area
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

## **Prevention of radicalisation**

This is still under government review.

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the Trust’s safeguarding approach.

*Radicalisation* is the process of a person legitimising support for, or use of, terrorist violence.

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

Extremism is defined in the Counter Extremism Strategy 2023 as “the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.” Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious,

sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalization.

The Three Saints Academy Trust values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Under duties imposed within the Prevent Duty Guidance 2015 as part of the Counter-Terrorism and Security Act 2015, each school within the trust will ensure that situations are suitably risk assessed, that they will work in partnership with other agencies, that all staff are suitably trained and have completed the Home Office's Prevent Training with School Committee Members and DSL/DDSL's completed the RPEC PREVENT training and that IT policies will ensure that children and young people are safe from terrorist and extremist material when accessing the internet in school.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The Three Saints Academy is clear that this exploitation and radicalisation should be viewed as a safeguarding concern. Each school within the trust seeks to protect children and young people against the messages of all violent extremism.

School staff have also undertaken online ProtectUK training with DSL's having the PROTECTUK Counter Terrorism Guidance App on their mobile phones.

## **Mandatory reporting of FGM**

Teachers *must* personally report to the police cases where they discover that an act of FGM appears to have been carried out, by calling 101. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's Designated Safeguarding Lead and involve Children's Social Care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. [Mandatory Reporting of Female Genital Mutilation - procedural information](#).

If there are suspicions regarding FGM, it is essential that schools take action **without delay**. If there are concerns that a child is at risk of, or is a victim of, FGM contact the police via 999 (for immediate risk) or 101. Alternatively, the NSPCC FGM helpline anonymously 24/7 on 0800 028 3550 or [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

## **Online safety**

The Three Saints Academy trust is committed to keeping pupils safe online. We therefore ensure that:



- ALL staff and volunteers understand that children can be harmed online via hurtful and abusive messages, enticing children to engage in age inappropriate conversations, sharing and production of indecent images or encouraging risk taking behaviour
- The school's online safety policy details how we keep pupils safe when using the internet and mobile technology
- Online bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our Behaviour and Relationships and Anti-Bullying policies.
- There is a clear and explicit procedure for dealing with mobile phones that are brought into school by children.
- DfE advice; [Searching, Screening and Confiscation](#) is followed where there is a need to search a pupil for a mobile device
- When school become aware of an online safety issue that has occurred outside of school, it is managed in accordance with the school Online Safety Policy
- The school has appropriate filters and monitoring systems in place regarding use of internet as be detailed in the Online Safety Policy.

As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such our governing body ensures that appropriate filters and monitoring systems are in place.

All staff recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.

The Trust ensures that, online safety training is a key part of the safeguarding training schedule for staff, committee members and volunteers, and the requirement to ensure children are taught about safeguarding, including ensuring that online safety is integrated, aligned and considered as part of the overarching safeguarding approach within school.

Additional information can be found within Keeping Children Safe in Education 2024 and Sharing Nudes and Semi Nudes.

### **Use of electronic devices in school**

The Three Saints Academy is committed to keeping pupils safe by ensuring that electronic devices such as cameras, phones and tablets are used in an appropriate manner. The Three Saints Academy Trust considers the safe use of any devices owned by all the trust schools. The Three Saints Academy recognises mobile phones and tablets can be valuable resources for taking photographic and video images of pupils for teaching and learning purposes, to record progress or to celebrate achievement

School will therefore ensure that:

- parental consent is obtained to take and use photographs and/or videos of children
- parental consent is obtained for photographs to be taken by the media for use in relation to promoting or publishing the school
- separate parental consent is obtained if any other agency requests to take photographs of any child
- parental consent will be sought every 12 months but may be sought more regularly at the discretion of the Headteacher
- images will be uploaded to, and stored in a secure place for a relevant amount of time, this may be for longer than the child is at school if appropriate
- photographs and videos of children are only taken to provide evidence of their achievements for developmental records or for other school related purposes
- staff, visitors, volunteers and students do not use their own mobile phones to take or record any images of children

- the school's digital camera/s or memory cards must not leave the school setting unless this is agreed by the Headteacher for official school business
- during outings, staff will only use mobile phones belonging to the setting wherever possible
- photos are printed/uploaded in the setting by staff and once done images are immediately removed from the camera's memory
- parents are reminded frequently of the risks associated with posting images of children to social media
- parents are reminded frequently that they are not permitted to distribute or post images that contain children other than their own
- staff, volunteers and visitors will not use mobile phones in toilet or changing areas and only in line with the schools Code of Conduct/acceptable use policy
- The Code of Conduct/acceptable use policy outlines when and where staff, volunteers and visitors can use their mobile phones
- All tablets/mobile phones or tablets must only be used by members of staff for work purposes.
- Only trust's devices, that are used by staff, will have social media or messaging apps on them. Social networking, on behalf of the school, will be done on these devices only.
- Headteacher/EY Managers must ensure any apps downloaded onto devices are age and content appropriate for the children or staff using them.
- Passwords or passcodes for devices must not be shared or written down and will be changed regularly.
- Mobile phones and devices belonging to the setting will always be used in accordance with the acceptable IT use policy and activity may be monitored for safeguarding reasons and to ensure policy compliance.
- EY devices must not be taken home with staff and must remain secure at the setting when not in use.
- ALL staff, volunteers and visitors will adhere to the above policies and failure to do so will be addressed appropriately by the Headteacher.

The School Committee/trust will ensure they maintain oversight of the Online Safety Policy and the arrangements put in place to ensure appropriate filtering and monitoring on school devices and school network. The appropriateness of any filtering and monitoring systems will in part be informed by the risk assessment required by the Prevent Duty as required by KCSIE 2024.

The schools in the Trust are directly responsible for ensuring the setting has appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures to keep up with evolving cyber-crime technologies.

## **Looked after children, and previously looked after children**

The School Committee will ensure that there is a designated member of staff who will ensure the academic progress, emotional wellbeing and safety of children who are looked after or have previously been looked after by the local authority.

All staff understand that children who are in the care of the local authority have usually experienced abuse and/ or neglect.

The School Committee will ensure that the named teacher understands and has knowledge of the child's legal status (whether they are looked after with the consent of the parent, under an interim care order or full care order) and the contact arrangements with the parents or people with parental responsibility.

The named teacher will have details of the child's care arrangements and the level of authority given to the carer by the local authority that looks after the child.

The named teacher will have the name and contact details of the social worker and the name of the virtual head from the authority that cares for the child.

All staff have the understanding and knowledge that previously looked after children remain vulnerable and will liaise with the designated teacher to ensure that information is shared to keep looked after and previously looked after children safe.

The designated teacher will work with the virtual school and the local authority to ensure that the educational outcomes of registered children who are looked after are met.

The designated teacher will have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who have been adopted from state care outside England and Wales.

The designated teacher must have the relevant experience and qualifications to fulfil this role and also be able to attend training to keep informed about developments in this area.

The designated teacher will liaise with the virtual head to discuss how funding can be best used to support the progress of looked after children and best meet the needs identified in the personal education plan (PEP).

### **Private Fostering**

Private fostering occurs when a child under the age of 16 (or under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

The school will request updated pupil information forms be completed annually to help to identify those children who have had a change in living arrangements.

Should the school become aware of a child who is privately fostered, the Designated Safeguarding Lead will notify the Local Authority who will check that the arrangement is suitable and safe for the child.

### **Police and Criminal Evidence Act (1984) – Code C**

The Headteacher, Designated Safeguarding Lead (and deputies) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

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

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

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

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, such as seeking guidance from specially trained officers, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person about whom there are grounds to suspect of an offence, must be cautioned<sup>1</sup> before being questioned about an offence<sup>2</sup>, or asked further questions if the answers they provide give grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

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

### **The appropriate adult' means, in the case of a child:**

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
  - a. a police officer;
  - b. employed by the police;
  - c. under the direction or control of the chief officer of a police force; or
  - d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

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

### **Safeguarding vulnerable groups, including Domestic Abuse**

Each school in the trust receives all police notifications of children who have been involved in domestic abuse incidents via Operation Encompass. <https://www.operationencompass.org/>

The designated safeguarding lead will inform relevant staff of any notification and agree what support (if any) the pupil should receive.

The definition of domestic abuse is:

**“any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.”**

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

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

<sup>2</sup> A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

All staff understand the significant impact that Domestic Abuse can have on a child both at the time of the incident and longer term. Each school follows the guidance set out within this policy to ensure the safety and wellbeing of children. Children who have experienced or witnessed Domestic Abuse will be monitored and supported through the school pastoral care system.

## **Honour Based Abuse (HBA)**

HBA is a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or **honour**. **Violence or abuse** can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their **honour** code.

## **Forced Marriage**

Forced Marriage is one whereby one or both parties do not consent to marriage but are forced to do so through violence, threats or any form of coercion. Schools play an important role in safeguarding children from being forced to marry. It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used. [Multi Agency statutory guidance for dealing with forced marriage and handling cases of forced marriage](#)

## **Modern Slavery**

The Modern Slavery Act 2015 places a statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking':

Staff must be aware of the above and contact the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL should then contact the NCA and follow their normal safeguarding procedures.

ALL staff will have read Annex B of Keeping Children Safe in Education 2024 and be aware of specific forms of abuse and safeguarding issues and vulnerable groups of children including;

- Children in the Court system;
- Children with family members in prison
- Homelessness

## **Children experiencing mental health difficulties**

At The Three Saints Academy we understand that mental health issues can be an indicator that a child has suffered, or is at risk of suffering from abuse, neglect or exploitation. Staff in our schools are not qualified to diagnose mental health problems. However, we are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a concern about the mental health of a child, which is also a safeguarding concern or appears to be developing into a safeguarding concern, then we will respond immediately by sharing this information

with the school Designated Safeguarding Lead, who will act in line with the safeguarding guidance set out in this policy.

As a school we aim to provide a nurturing environment for children and staff and we teach resilience through our school curriculum. Whenever a concern arises which is related to mental health, we will always act in the best interest of the person involved and access appropriate support either internally or by accessing support from external agencies.

The Designated Safeguarding Lead has working knowledge of the guidance in Chapter 4 of [Mental Health and Behaviour in Schools](#).

### **Serious Violence**

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

# **Appendix 7 – Cause for Concern Form with Body Map**

# Appendix 8 – Social Care Referral Form

Add link if online form



## **Appendix 9 – Link to Local Authority Safeguarding Partnership referral forms**

[Add links](#)

Prevent Referral

LADO Referral

# **Appendix 10 – Local Authority Thresholds of Need and Safeguarding Flowchart**

# Appendix 11 – Induction Safeguarding Sheet

## **Appendix 12 – Visitor Safeguarding Leaflet**

## **Appendix 13 – Children’s Safeguarding Leaflet (if applicable)**

# **Appendix 14 – Local Authority Transfer STAR Protocol**

## Appendix 15 – Filtering and Monitoring Standards

IDENTIFY AND ASSIGN ROLES AND RESPONSIBILITY TO MANAGE FILTERING AND MONITORING SYSTEM	
DfE GUIDANCE	TRUST/SCHOOL EVIDENCE
<p><b>The importance of meeting the standard</b></p> <p>Schools and colleges should provide a safe environment to learn and work, including when online. Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.</p> <p>Clear roles, responsibilities and strategies are vital for delivering and maintaining effective filtering and monitoring systems. It’s important that the right people are working together and using their professional expertise to make informed decisions</p>	<p>The Chair/Safeguarding school committee member is responsible for ensuring standards are met. During safeguarding briefings with the DSL they will discuss any actions arising from the 360 degree safe audit. They also have a Safeguarding strategy briefing document with prompts of what to look for in line with the UK Council for Internet Safety guidance for Governing Boards and will speak with a group of pupils to capture pupil voice.</p> <p>The Headteacher/DSL is responsible for ensuring standards are met.</p> <p>The Trust’s IT provider Agilisys monitors and controls the firewall and internet filtering system by utilising the ADEPT Education filtering system on the LGfL network.</p> <p>The Trust provides additional filtering and monitoring via IMPERO to enable all staff to monitor IT usage.</p> <p>School Protect: Webscreen – default list using pre-defined system bundles is in place, additional access rights such as Twitter can be enabled for defined groups using this system following authorisation from the CEO/Headteacher. Groups/individuals with additional access rights is discussed when reviewing the 360 degree safe audit and reviewed and updated as necessary.</p> <p>IMPERO has an advanced policy system which uses pre-defined lists updated automatically. As part of the 360 degree safe annual audit and online safety group meeting, incidents and alerts are reviewed in order that provision can be assessed on its effectiveness and any actions required such as filtering system modifications or curriculum implications.</p> <p>TRUST annual audit monitors if the 360 degree safe audit has been undertaken. The Headteacher discusses any actions from the Trust audit with the Chair of the School Committee</p> <p>School Protect: Webscreen scheduled reports are issued to Headteachers.</p> <p>IT technicians monitor IMPERO daily alerts and Headteachers receive automatic alerts that are categorised as “severe” along with the Trust’s Director of Safeguarding &amp; Attendance.</p>

	<p>All alerts are monitored, those which are deemed <b>not</b> false positive are investigated and recorded on CPOMS.</p> <p>IMPERO alert capture reports are scheduled for Headteachers to ensure all have been monitored and actioned accordingly.</p> <p>IT technician undertakes spot checks of IMPERO usage by staff during lessons and provides a report to the headteachers at least half termly and actions taken accordingly by the Headteacher. Trust Annual audit monitors if spot check reports have taken place and actioned accordingly.</p> <p>Staff and school committee members have been trained regarding online safety on induction and undertake annual training. They receive IMPERO training and guidance regularly. Additional briefings are provided as part of update safeguarding briefings should issues arise.</p> <p>Staff are aware and trained to report concerns via the CPOMS safeguarding system.</p> <p>Children’s views are sought regularly and fed into the-online safety group.</p>
<b>REVIEW YOUR FILTERING AND MONITORING PROVISION AT LEAST ANNUALLY</b>	
<b>DfE GUIDANCE</b>	<b>TRUST/SCHOOL EVIDENCE</b>
<p><b>The importance of meeting the standard</b></p> <p>For filtering and monitoring to be effective it should meet the needs of your pupils and staff, and reflect your specific use of technology while minimising potential harms.</p> <p>To understand and evaluate the changing needs and potential risks of your school or college, you should review your filtering and monitoring provision, at least annually.</p> <p>Additional checks to filtering and monitoring need to be informed by the review process so that governing bodies and proprietors have assurance that systems are working effectively and meeting safeguarding obligations.</p>	<p>A 360 degree SAFE audit tool is completed annually and its results shared with the Chair of the School Committee.</p> <p>TRUST annual audit monitors if the 360 degree safe audit has been undertaken. The Headteacher discusses any actions from the Trust audit with the Chair of the School Committee</p> <p>As part of the 360 degree safe annual audit and online safety group meeting, incidents and alerts are reviewed in order that provision can be assessed on its effectiveness and any actions required such as filtering system modifications or curriculum implications. Actions from any safeguarding issue that arises may also require reviewing and updating provision sooner than the annual review. Online safety incidents are reported to the school committee.</p> <p>School committee member responsible for safeguarding meets with the DSL and also meets with pupils to discuss safeguarding issues and review practice.</p> <p><b>Technical requirements</b></p> <p>The Trust’s IT provider Agilisys monitors and controls the firewall and internet filtering system by utilising the ADEPT Education filtering system on the LgFL network.</p>



	<p>The Trust provides additional filtering and monitoring via IMPERO to enable all staff to monitor IT usage.</p> <p>IMPERO alert reports identify risk categories. CPOMS reports identifies risk categories. School are aware of their contextual safeguarding issues and have a matrix of vulnerability which identifies the risk profile of their pupils.</p> <p>Online safety is delivered throughout the school curriculum not just part of computing curriculum and enhanced further through PHSE, RSE themed days and weeks as well as signposted links through the school website and in conjunction with <a href="#">DfE Teaching Online Safety in Schools January 2023</a> and <a href="#">Education for a Connected World Framework</a></p> <p>School Protect: Webscreen filtering checks are completed by the IT technician monthly using the SWGfL testing tool and reported to the Headteacher/DSL.</p> <p>School Protect: Webscreen – default list using pre-defined system bundles is in place, additional access rights such as Twitter can be enabled for defined groups using this system following authorisation from the CEO/Headteacher. Groups/individuals with additional access rights is discussed when reviewing the 360 degree safe audit and reviewed and updated as necessary.</p> <p>Spot checks of staff having IMPERO open is undertaken by the IT technician and reported to the Headteacher at least half termly with action taken were necessary.</p> <p>Alerts are monitored daily. Alert MONITORING reports are scheduled weekly.</p> <p>Concerns are logged on CPOMS and all staff are trained.</p>
<p><b>YOUR FILTERING SYSTEM SHOULD BLOCK HARMFUL AND INAPPROPRIATE CONTENT, WITHOUT REASONABLY IMPACTING TEACHING AND LEARNING</b></p>	
<p><b>DfE GUIDANCE</b></p>	<p><b>TRUST/SCHOOL EVIDENCE</b></p>
<p><b>The importance of meeting the standard</b></p> <p>An active and well managed filtering system is an important part of providing a safe environment for pupils to learn.</p> <p>No filtering system can be 100% effective. You need to understand the coverage of your filtering system, any limitations it has, and mitigate accordingly to minimise harm and meet your statutory requirements</p>	<p>School Protect: Webscreen – default list using pre-defined system bundles is in place, additional access rights such as Twitter can be enabled for defined groups using this system following authorisation from the CEO/Headteacher. Groups/individuals with additional access rights is discussed when reviewing the 360 degree safe audit and reviewed and updated as necessary.</p> <p>IMPERO has an advanced policy system which uses pre-defined lists updated automatically.</p>

<p>in <a href="#">Keeping children safe in education 2024</a> (KCSIE) and the <a href="#">Prevent duty</a>.</p> <p>An effective filtering system needs to block internet access to harmful sites and inappropriate content. It should not:</p> <ul style="list-style-type: none"> <li>• unreasonably impact teaching and learning or school administration</li> <li>• restrict students from learning how to assess and manage risk themselves</li> </ul>	<p>All incidents are reported on CPOMS by staff and actioned accordingly.</p>
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**YOU SHOULD HAVE EFFECTIVE MONITORING STRATEGIES THAT MEET THE SAFEGUARDING NEEDS OF YOUR SCHOOL OR COLLEGE**

<b>DfE GUIDANCE</b>	<b>TRUST/SCHOOL EVIDENCE</b>
<p><b>The importance of meeting the standard</b></p> <p>Monitoring user activity on school and college devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software.</p> <p>Monitoring allows you to review user activity on school and college devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.</p> <p>Your monitoring strategy should be informed by the filtering and monitoring review. A variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:</p> <ul style="list-style-type: none"> <li>• physically monitoring by staff watching screens of users</li> <li>• live supervision by staff on a console with device management software</li> <li>• network monitoring using log files of internet traffic and web access</li> <li>• individual device monitoring through software or third-party services</li> </ul>	<p>The Chair/Safeguarding school committee member (NAME) is responsible for ensuring standards are met. During safeguarding briefings with the DSL they will discuss any actions arising from the 360 degree safe audit. They also have a Safeguarding strategy briefing document with prompts of what to look for in line with the UK Council for Internet Safety guidance for Governing Boards and will speak with a group of pupils to capture pupil voice. The Headteacher/DSL (NAME) is responsible for ensuring standards are met.</p> <p>The Trust's IT provider Agilisys monitors and controls the firewall and internet filtering system by utilising the ADEPT Education filtering system on the LGfL network. The Trust provides additional filtering and monitoring via IMPERO to enable all staff to monitor IT usage.</p> <p>School Protect: Webscreen – default list using pre-defined system bundles is in place, additional access rights such as Twitter can be enabled for defined groups using this system following authorisation from the CEO/Headteacher. Groups/individuals with additional access rights is discussed when reviewing the 360 degree safe audit and reviewed and updated as necessary.</p> <p>IMPERO has an advanced policy system which uses pre-defined lists updated automatically. As part of the 360 degree safe annual audit and online safety group meeting, incidents and alerts are reviewed in order that provision can be assessed on its effectiveness and any actions required such as filtering system modifications or curriculum implications. TRUST annual audit monitors if the 360 degree safe audit has been undertaken. The Headteacher discusses any actions from the</p>

	<p>Trust audit with the Chair of the School Committee</p> <p>School Protect: Webscreen scheduled reports are issued to Headteachers.</p> <p>IT technicians monitor IMPERO daily alerts and Headteachers receive automatic alerts that are categorised as “severe” along with the Trust’s Director of Safeguarding &amp; Attendance.</p> <p>All alerts are monitored, those which are deemed <b>not</b> false positive are investigated and recorded on CPOMS.</p> <p>IMPERO alert capture reports are scheduled for Headteachers to ensure all have been monitored and actioned accordingly.</p> <p>IT technician undertakes spot checks of IMPERO usage by staff during lessons and provides a report to the headteachers at least half termly and actions taken accordingly by the Headteacher. Trust Annual audit monitors if spot check reports have taken place and actioned accordingly.</p> <p>Staff and school committee members have been trained regarding online safety on induction and undertake annual training. They receive IMPERO training and guidance regularly. Additional briefings are provided as part of update safeguarding briefings should issues arise.</p> <p>Staff are aware and trained to report concerns via the CPOMS safeguarding system.</p> <p>Cyber Security training is part of the SMARTLOG training package that all staff and Chair of School Committees complete.</p>
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## Appendix 16 – Digital and Technology Standard

SCHOOLS SHOULD HAVE APPROPRIATE IT SECURITY AND SAFEGUARDING SYSTEMS IN PLACE UNDER BOTH CHILD AND DATA PROTECTION LAW	
DfE GUIDANCE	TRUST/SCHOOL EVIDENCE
<p><b>The importance of meeting the standard</b></p> <p>It's essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate students, and staff in their use of technology. It establishes ways to identify, intervene in, and escalate any concerns where appropriate</p>	<p>The Chair/Safeguarding school committee member is responsible for ensuring standards are met. During safeguarding briefings with the DSL they will discuss any actions arising from the 360 degree safe audit. They also have a Safeguarding strategy briefing document with prompts of what to look for in line with the UK Council for Internet Safety guidance for Governing Boards and will speak with a group of pupils to capture pupil voice.</p> <p>The Headteacher/DSL is responsible for ensuring standards are met.</p> <p>The Trust's IT provider Agilisys monitors and controls the firewall and internet filtering system by utilising the ADEPT Education filtering system on the LGfL network. The Trust provides additional filtering and monitoring via IMPERO to enable all staff to monitor IT usage.</p> <p>School Protect: Webscreen – default list using pre-defined system bundles is in place, additional access rights such as Twitter can be enabled for defined groups using this system following authorisation from the CEO/Headteacher. Groups/individuals with additional access rights is discussed when reviewing the 360 degree safe audit and reviewed and updated as necessary.</p> <p>IMPERO has an advanced policy system which uses pre-defined lists updated automatically.</p> <p>As part of the 360 degree safe annual audit and online safety group meeting, incidents and alerts are reviewed in order that provision can be assessed on its effectiveness and any actions required such as filtering system modifications or curriculum implications.</p> <p>TRUST annual audit monitors if the 360 degree safe audit has been undertaken. The Headteacher discusses any actions from the Trust audit with the Chair of the School Committee</p> <p>School Protect: Webscreen scheduled reports are issued to Headteachers.</p> <p>IT technicians monitor IMPERO daily alerts and Headteachers receive automatic alerts that are categorised as “severe” along with the Trust's Director of Safeguarding &amp; Attendance.</p> <p>All alerts are monitored, those which are deemed <b>not</b> false positive are investigated and recorded on CPOMS.</p>

	<p>IMPERO alert capture reports are scheduled for Headteachers to ensure all have been monitored and actioned accordingly.</p> <p>IT technician undertakes spot checks of IMPERO usage by staff during lessons and provides a report to the headteachers at least half termly and actions taken accordingly by the Headteacher. Trust Annual audit monitors if spot check reports have taken place and actioned accordingly.</p> <p>Staff and school committee members have been trained regarding online safety on induction and undertake annual training. They receive IMPERO training and guidance regularly. Additional briefings are provided as part of update safeguarding briefings should issues arise.</p> <p>Staff are aware and trained to report concerns via the CPOMS safeguarding system.</p> <p>Children’s views are sought regularly and fed into the online safety group.</p>
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