

Safeguarding and Child Protection Policy

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Aim of policy

1.1 At HISP, we recognise the significant positive impact of a collaborative approach across our Trust on supporting and protecting children in and beyond our communities. All staff within the Trust are responsible for and committed to providing an environment that safeguards and promotes the welfare, safety, and health of all our children.

1.2 The aim of the policy is to:

- Protect children from any maltreatment or harm and prevent any impairment of their health and/or development
- To ensure each school/setting offers a safe and supportive environment for all children under its care and creates a culture of vigilance throughout the organisation
- Ensure all staff, trustees, governors, volunteers, and visitors are aware of and clearly understand their statutory safeguarding responsibilities
- Outline how all staff, trustees, governors, volunteers, and visitors will meet their safeguarding duty and protect children from harm
- Empower every child, regardless of their background or circumstances, to have the best possible opportunities in life.

1.3 HISP implement the following approach to safeguard and promote the welfare of children:

- **Prevention:** HISP schools, Learning Partnerships, and the Central Team will create an ethos and culture where all pupils feel secure and able to build trusted relationships with staff. Children will be encouraged to talk and feel confident that they will be listened to. Staff and volunteers will be trained regularly to understand their responsibilities to recognise and report safeguarding or child protection concerns. This includes maintaining professional curiosity and understanding that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or may not recognise their experiences as harmful. As part of a broad and balanced curriculum, through a range of planned teaching and learning opportunities, children are taught about safeguarding, including online safety.
- **Protection:** Each member of staff, trustees, governor, volunteer and any other visitor involved in regulated activity with children undergoes a thorough safer recruitment process and is sufficiently trained and supported to respond appropriately and sensitively to safeguarding and child protection concerns.
- **Support:** Schools will provide structured systems of support for all pupils and appoint appropriately qualified and experienced staff (DSLs and DDSLs) to provide advice, training and support around safeguarding concerns.
- **Working with parents and external agencies:** High quality communication with parents and carers to ensure appropriate support and actions are undertaken. Links with external agencies are strong with contextual safeguarding priorities for each school built into the safeguarding curriculum.
- **Commitment:** every member of the HISP community is committed to safeguarding and to creating a proactive culture of vigilance to prevent harm, ensure safe environments to support children's well-being.

1.4 HISP commits to acting in accordance with Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2023). This policy does not aim to replicate the guidance in full. Therefore, the policy should be read in conjunction with at least Part One and Annex B of Keeping Children Safe in Education (2024).

1.5 Whilst the policy primarily focusses on the safeguarding of children, it also references the action to be taken if any member of the Trust community becomes concerned about the safety of welfare of an adult at risk, aged 18 or over.

1.6 A summary of key information from this policy can be found in Appendix L.

Legislation and statutory guidance

This policy sets out how HISP carries out its statutory responsibility to safeguard and promote the welfare of pupils.

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2023), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

2.1 Statutory Guidance

- Keeping Children Safe in Education (2024)
- Working together to safeguarding children 2023 (updated Feb 2024)
- Multi-agency statutory guidance on female genital mutilation (2020)
- Early Years Foundation Stage (2024)
- Teachers' Standards July (2021)
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

2.2 Legislation

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).

This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage
- This policy also complies with our funding agreement and articles of association.

2.3 HISP also has regard to the following guidance and reviews relating to safeguarding, including:

- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2022)
- Information Sharing: Guidance for Safeguarding Services (July 2018)
- Teaching Online Safety in schools (2023)
- DfE Guidance on Relationships education, relationships and sex education (RSE) and health education (2019, updated 2021)
- Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024)
- Child Protection in England: National review into the murders of Arthur Labinjo-Hughes and Star Hobson (2022)
- Local Child Safeguarding Practice Review: Child Q (2022)
- Searching, Screening and Confiscation (2022)
- Protecting Children from Radicalisation: The Prevent Duty (2015)
- Filtering and monitoring standards for schools and colleges (2022, updated 2024)

2.4 Local guidance

- <https://hipsprocedures.org.uk/>
- <https://pdscp.co.uk/>

Definitions

3.1 Safeguarding and promoting the welfare of children means:

- 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

3.2 Child protection is part of safeguarding and refers to specific actions and measures taken to protect children who are suffering, or are at risk of suffering, significant harm, including abuse or neglect. It involves identifying, responding to, and addressing the immediate safety needs of vulnerable children. This includes harm that occurs inside or outside the home, including online.

3.3 Safeguarding is a broader concept that encompasses all policies, procedures, and practices designed to promote the welfare of children and protect them from harm. It includes preventing harm, ensuring safe environments, and taking proactive steps to support children's well-being.

For the purposes of this policy, the term 'safeguarding' refers to everything all schools do to keep children safe and promote their welfare, including (but not limited to):

- Supporting pupils' health, safety and well-being, including their mental health;
- Meeting the needs of children with special educational needs and/or disabilities;
- The use of reasonable force;
- Meeting the needs of children with medical conditions;
- Providing first aid;
- Educational visits;
- Intimate care and emotional wellbeing;
- Online safety and associated issues;
- Appropriate arrangements to ensure school security, taking into account the local context;
- Keeping children safe from risks, harm and exploitation; and
- Child protection.

3.4 Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix C explains the different types of abuse.

3.5 Child on child abuse refers to the abuse of a child or children perpetrated by another child or children. See section 9 for more details.

3.6 Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix C defines neglect in more detail.

3.7 Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

3.8 Children includes everyone under the age of 18.

3.9 Safeguarding partners. The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

3.10 Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

3.11 Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

3.12 Within this policy:

- Parents/carers refers to birth parents and other adults in a parenting role, for example adoptive parents, stepparents and foster carers.
- 'Staff' or 'members of staff' refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the school.

3.13 Keeping Children Safe in Education may be abbreviated to 'KCSIE'.

3.14 Child abuse is covered by the term "significant harm" and is defined in the Adoption and Children Act 2002 in the following way:

- "harm" means ill-treatment or the impairment of health or development
- "development" means physical, intellectual, emotional, social or behavioural development
- "health" means physical or mental health
- "ill-treatment" includes sexual abuse and forms of ill-treatment which are not physical

Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 15)

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after, previously looked after, or in kinship care (see section 17)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

Who is responsible for carrying out this policy?

5.1 Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the schools, Learning Partnerships, and Central Team and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The Trust schools, Central Team, and Learning Partnerships play a crucial role in preventative education. This is in the context of a collective approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by the following in relation to each context:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.2 The Board of Trustees will:

- determine and keep under review the Trust's safeguarding policy;
- ensure that an effective organisation is created for the management of safeguarding and child protection concerns;
- ensure that the Trust promotes the correct attitude towards safeguarding and child protection with staff, volunteers and visitors; and

- monitor and evaluate the effectiveness of the academies' safeguarding practices and procedures.
- nominate a Safeguarding Trustee to monitor the effectiveness of this policy in conjunction with the full board.

5.3 The Chief Executive Officer (CEO)

The CEO, as delegated by the Board of Trustees, is accountable for the safeguarding of children across HISP and responsible for the implementation of this policy across the Trust. The CEO reports to the Board of Trustees on all safeguarding matters. The CEO will:

- ensure that all schools within HISP, including Inspiring Future Teachers, and the HISP Teaching School Hub, have suitable safeguarding-related policies implemented in all Trust, including the behaviour policy for pupils (where applicable) and a conduct policy for staff.
- regularly review the effectiveness of the safeguarding provision across the Trust, including assessment of progress against the Trust's safeguarding strategy and review of safeguarding risks.
- ensure that this policy is reviewed annually and ratified by the Board.
- respond to low level concerns or allegations of abuse against members of the Executive Team in line with the Low-Level Concerns and Dealing with Allegations Against Staff procedures.

5.4 The Education and Standards Committee Chair provides a (brief and by exception) written report to each Board meeting to report on risk in this area.

5.5 Local Academy Committees

It is the overarching responsibility of the local academy committees to ensure that the HISP Safeguarding and Child Protection policy and procedures or local school Safeguarding and Child Protection policies are in place and are operating effectively across all schools and learning partnerships.

The Local Academy Committee will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix E of this policy covers this procedure
- That this policy reflects that those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The Chair of Governors will act as the ‘case manager’ in the event that an allegation of abuse is made against the headteacher, where appropriate (see Appendix E).
- The Chair of Trustees will act as the ‘case manager’ in the event that an allegation of abuse is made against the CEO, where appropriate

Section 21 of this policy has information on how trustees and governors are supported to fulfil their role.

5.6 All those involved in governance must attend all relevant induction and annual training and development provided by the Trust. It is the responsibility of all trustees and governors to ensure they have read and understood the KCSIE document in its entirety alongside this policy and have signed a declaration confirming this has been undertaken on appointment and each time the policy and KCSIE are updated.

They must:

- work to facilitate a whole trust approach to safeguarding, including child on child abuse, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedures, and training at trust level and individual schools and learning partnerships are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- ensure that all schools have systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible.

5.7 The Director of School Improvement and Safeguarding will set the strategic safeguarding direction for the Trust, working in an advisory capacity to provide support and guidance to Heads and DSLs on all safeguarding related matters. It is the responsibility of the Director of School Improvement and Safeguarding to:

- ensure that suitable arrangements are in place within each school to satisfy the duties and arrangement as outlined in this policy, including ensuring that there is appropriate staffing with the required time, funding, resources and support;

- ensure, in co-ordination with the Headteacher, that all relevant Senior Managers are capable and competent in their given roles and provided with suitable and sufficient information and instruction;
- maintain strategic oversight of the effectiveness of safeguarding within schools;
- ensure each school has a nominated Safeguarding Governor who visits the school at least once per term;
- have strategic oversight of developing safeguarding and child protection ensuring statutory compliance and development of this area;
- develop, implement, and evaluate the impact of annual Trust and individual school safeguarding action plans;
- represent the Trust within strategic multi-agency partnerships;
- provide or facilitate the provision of advice, guidance, coaching support to DSLs on complex safeguarding cases;
- Chair the Trust DSL Network Meetings.

The Director of School Improvement and Safeguarding will also provide operational safeguarding advice, support and guidance to leaders across the Trust, including structured supervision. The main areas of responsibility include:

- Providing safeguarding supervision to DSLs.
- Conducting regular audits of child protection records, identifying emerging themes and areas for development, and incorporating these in to learning and development activities.
- Conducting a range of quality assurance activities relating to safeguarding, alternative provision, elective home education and children missing (unexplainable and/or persistent absences from education) from education.

5.8 Executive Headteachers/Headteachers/Heads of School/Directors of Learning Partnerships are accountable for the effective safeguarding of children in their schools and areas. They are responsible for the implementation of this policy (or continued school level policy for 2024-25) including:

- Ensuring that staff (including temporary staff and adult learners) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy or the local school policy to parents/carers/adult learners when their child joins HISP/the school and via the HISP/school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix E)
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Ensure that the school works with social care, the police, health services and other services to; promote the welfare of children and provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;

- Safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- Ensure that children’s social care (from the host local authority or placing authority) have access to the school to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education;
- Ensure the relevant staffing ratios are met, where applicable (Early years providers and primary schools);
- Contribute to safeguarding quality assurance activities;
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the Director of School Improvement and Safeguarding, and the DSL on this
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting
- Ensure that this policy and associated procedures, including the use of CPOMS/My Concerns are adhered to by all staff and act as necessary if not
- Ensure that all staff are made aware of the named governor for safeguarding and the DSL
- Promote an environment and culture of safety where pupils feel safe and listened to and this includes ensuring that the curriculum includes safeguarding and how to keep safe;
- Decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the DSL
- Organise appropriate cover for the role of DSL for any out of hours/out of term activities
- Appoint a ‘Designated Teacher for Looked After, Previously Looked After Children’ and children in kinship care to promote their educational achievement;
- Ensure the whistle blowing policy and procedures have been disseminated to all staff and that any allegations against staff are responded to appropriately
- Ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and an up to date single, central record is maintained
- Have overall responsibility for the safeguarding of pupils placed in alternative provision and should be satisfied that the placement meets the pupil’s needs.

Each Executive Headteacher, Headteacher, Head of School, Director will retain accountability for all safeguarding-related matters within their school/setting.

5.9 Designated Safeguarding Leads (DSL)

The DSL is a member of the Senior Leadership Team within the school, or they are a leader of one of the HISP Learning Partnerships or Central Team. The DSL takes lead responsibility for child protection and wider safeguarding. This includes online safety and an understanding of the filtering and monitoring systems in place. DSLs will be given additional time, funding, training, resources and support to carry out their role effectively. Each HISP DSL is listed in Appendix A. The full responsibilities of the DSL are set out in Annex C, KCSIE (2023).

Note: The HISP Director of School Improvement and Safeguarding is not the DSL for any individual schools within the Trust.

5.10 When the DSL is absent, the Deputy DSL will cover. If they are not available, a member of SLT will cover. Any deputies will be trained to the same standard as the designated safeguarding lead. Whilst the

activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated.

5.11 HISP recognises the pressures inherent within the role of DSLs and DDSLs, and the demands placed upon them. To preserve staff wellbeing, HISP does not expect DSLs or DDSLs to monitor emails, phonelines or CPOMS/my concerns outside of working hours, except during periods of planned school trips or activities. All members of the school community (staff, parents, and pupils) will be made aware of this expectation. Where staff are not contracted to work outside of termtime, information will be shared with stakeholders signposting support. To promote the safety of children during these times, schools will regularly share contact details for statutory and non-statutory support services, including police and children social care, with all members of the school community. This will include via school websites.

5.12 All staff

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children. All staff have a responsibility to provide a safe environment, where children can learn;

All staff will:

- Will complete mandatory training provided by the Trust/school so that they know and understand: how to identify indicators of abuse, neglect, and harm and the behaviours associated with these risks; what to do if a child discloses information which is a safeguarding concern (including FGM); what safeguarding systems are in place within the school, including the use of CPOMS/My Concerns for recording concerns, decisions and actions;
- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- School, Learning Partnerships, and the Central Team will make use a variety of methods to assess staff understanding of guidance and training
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- Know how to and should be prepared to make referrals to the MASH or CRS if they are concerned that a child is suffering, or likely to suffer, significant harm and understand the role that they may be expected to play in social care assessments;
- Be encouraged and given the opportunity to contribute to the development of safeguarding policy and practice.
- All staff will be aware of:
 - The systems that support safeguarding, including this (or the individual school policy for 2024-25) child protection and safeguarding policy, the staff code of conduct policy, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, online safety that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education
 - The Trust and individual school's policy and procedures with regards to safeguarding and child-on-child abuse and the important role they must play in preventing it and responding where they believe a child may be at risk from it;

- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including those linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of Trust or individual school/setting safeguarding policy or practice, they speak to the DSL or Director of School Improvement and Safeguarding immediately, so that additional training can be arranged.

5.13 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

Confidentiality and information sharing

6.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between each school, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. If staff are unsure whether information should be provided, advice should be sought from the Data Protection Officer.

HISP reinforces that:

- Timely information sharing is essential to effective safeguarding

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe and promoting their welfare.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about sexual violence or sexual harassment:
 - Staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

6.2 All schools adhere to the Data Protection Act (2018) and the General Data Protection Regulation (2018).

6.3 Sharing information with parents:

- Each school will ensure the Safeguarding and Child Protection Policy is available publicly on each school's website, it will also be available on the HISP Trust website.

- Where appropriate, staff will discuss any concerns about a child with the child's parents. The Designated Safeguarding Lead (DSL) will normally do this in the event of a concern or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.
- If notifying the parents would increase the risk to the child, it will be discussed with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, parents of all the children involved will be contacted.

6.4 Consent – sharing information:

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (Data Protection Act, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child at risk, or where it is not possible to gain consent.

Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.

6.5 As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.

6.6 When considering whether, or not, to share safeguarding information (especially with other agencies), staff will record who they are sharing that information with and for what reason. If a decision has been taken not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.

Recognising and responding to abuse: how to take action

7.1 If a member of staff, parent or member of the public is concerned about the safety or welfare of a child, they should report it to the DSL as soon as possible, and record the incident on CPOMs. If the DSL is not available, it should be reported to the deputy safeguarding lead/s immediately. In exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.

7.2 Although any member of staff can make a referral to children's social care, there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

7.3 All staff will be alert to indicators of abuse (including child on child) and will report any of the following to the Designated Safeguarding Lead and log on CPOMs;

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child's presentation;
- any indicators that a child may be experiencing child on child abuse;

- any concerns relating to people who may pose a risk of harm to a child; and/or
- any disclosures of abuse that children have made.

7.4 More information about our approach to child-on-child abuse (including sexual violence and sexual harassment) can be found in section 9.

7.5 For more information regarding specific safeguarding issues, please see Part One and Annex B of KCSIE (2024) and Appendix F of this policy.

7.6 Responding to a Disclosure When responding to a disclosure from a child, staff will:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Record this conversation onto CPOMS and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL and / or logging onto CPOMS if you have concerns about a child.

7.7 Reporting and Recording a Concern

All staff and volunteers receive guidance on the procedures to report safeguarding concerns upon induction and receive regular updates throughout the year on 'Recording Disclosures' with examples provided and modelled. All concerns should be reported in writing, using CPOMS. Records should be created as soon as possible, on the same day and during working hours. Staff should never wait until the next day to complete a safeguarding concern report. All staff and volunteers will:

- make a written record on CPOMS (see Record Keeping), informing the child that you are doing so;
- pass the information to the DSL and DDSL without delay, either in person (for immediate, priority cases) and in writing (lower-level concerns) depending on the nature of the concern. All reports to the DSL must be followed up in writing following local procedures.
- The DSL/DDSL will then:

- Keep a confidential record of all comments, actions and observations on CPOMs. These records will be kept securely and access will be restricted to only staff authorised by the DSL, Head or Trust Director of School Improvement and Safeguarding.
- Seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL or the DDSL will contact the parent in the event of a concern, suspicion or disclosure. However, if the DSL or the DDSL believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care/Multi Agency Safeguarding Hub (MASH).
- If the DSL or the DDSL believes that “a child is experiencing or may have already experienced abuse or neglect” or “is at risk of suffering significant harm” either now or in the future, then the school will comply with the procedures of the Hampshire Safeguarding Partnership.

7.8 Concerns About Significant Harm or Imminent Danger

Make a referral to local authority children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Child abuse can also be reported to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

At Thornden School we will call the Professionals Duty line to immediate advice, as well as logging an Inter-Agency Referral Form to ensure that each concern is recorded in writing.

Tell the DSL as soon as possible if you make a referral directly.

7.9 Concerns Below the Threshold for Significant Harm and No Imminent Danger

Figure 1 below, illustrates the procedure to follow if you have any concerns about a child’s welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ below). Share any action taken with the DSL as soon as possible.

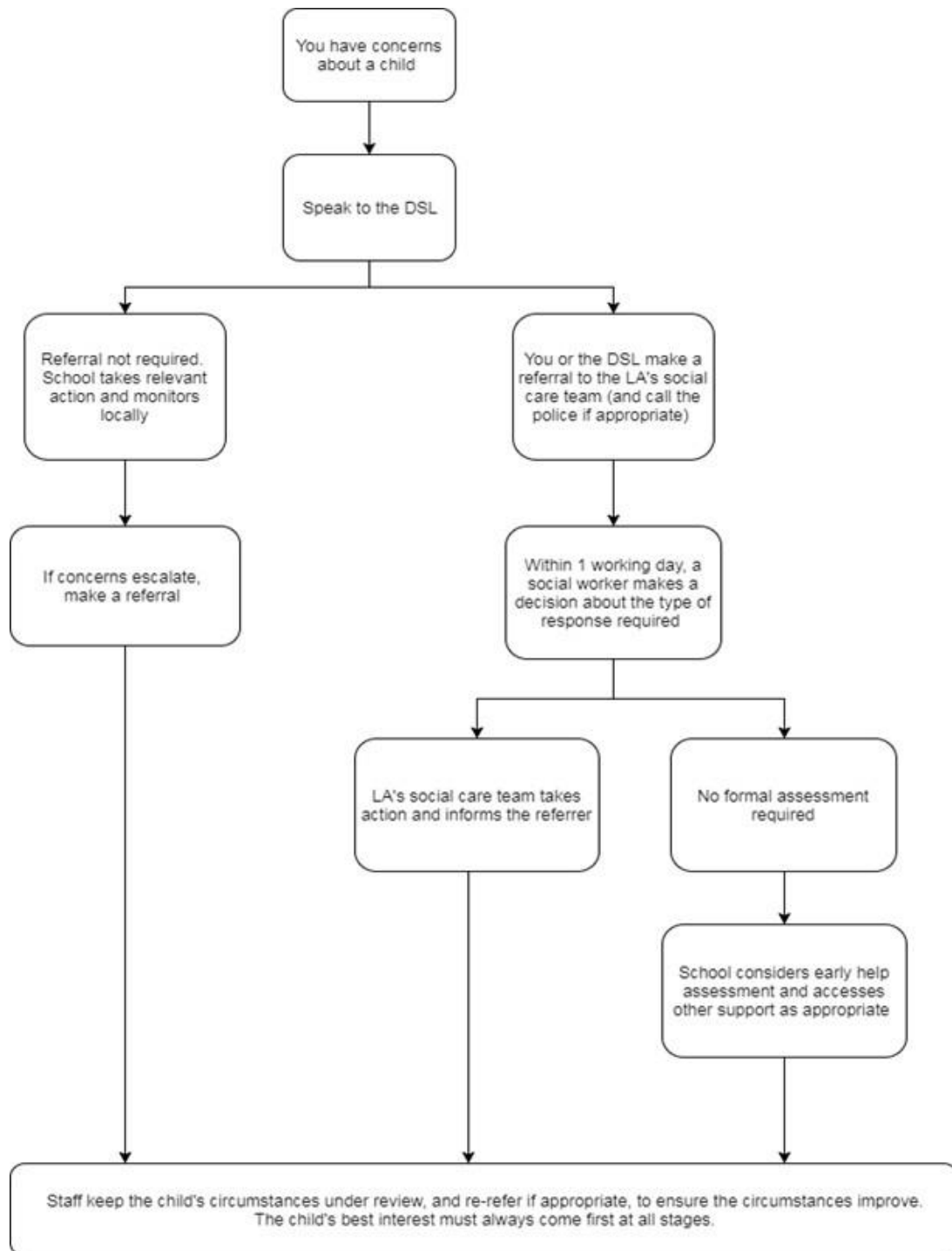
Staff should log concerns on CPOMS, at the earliest opportunity, providing sufficient information and context for the DSL/DDSL to assess the information. The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children’s social care, using the thresholds guidance published by the local safeguarding partnership. If it is decided to make a referral to children’s social care the parent/carer will be informed, unless to do so would place the child at further risk or undermine the collection of evidence.

All concerns, discussions and decisions will be recorded in writing.

The DSL will provide guidance on the appropriate action. Options will include:

- managing any support for the child internally via the school’s own pastoral support processes;
- an Early Help Assessment; or
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

Figure 1: Procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm. Or in immediate danger)



7.10 Early help and Vulnerable Children

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child. Early help means providing support as soon as a problem emerges at any point in a child's life. If early help is appropriate, the DSL or DDSL will generally lead on involving the child and family and liaising with other agencies and setting up an inter-agency assessment as appropriate.

Staff may be required to support, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL or DDSL any ongoing/escalating concerns so that consideration can be given to a referral to children's social care if the child's situation does not appear to be improving.

We recognise that any child can be the victim of abuse and may benefit from early help. However, we will be particularly vigilant to potential need for early help if a child;

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

The DSL will maintain a list of pupils who the school has identified to be at potential risk, including those with a social worker, and ensure that relevant staff are aware and that these pupils are monitored closely and supported to achieve the best possible outcomes. Many of these children will be looked after children, previously looked after children, children in kinship care, or have special educational needs or disabilities.

7.11 Referrals

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The school will be guided by MASH as to the appropriate outcome e.g., complete an Early Help Assessment (EHA) or refer to a relevant specialist agency.

All Child Protection records, including referrals, will be maintained on CPOMs. The protocols as outlined in the Data Protection Policy must be followed.

The local authority will decide within 1 working day of a referral about what course of action to take and will inform the referrer of the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. All escalations must be recorded on CPOMS/my concerns.

The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Consent will be required before support can be delivered to any individual through the Channel programme. Contact details for the MASH and CRS can be found in Appendix A of this policy.

7.12 Trigger Points and Escalation

In the event of serious incidents, Heads and the Director of School Improvement and Safeguarding should be notified by the DSL/Head immediately. The Chair of the Board and Safeguarding Trustee will also be informed.

7.13 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix F of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow local safeguarding procedures.

7.14 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.15 If you have a concern about mental health

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.9. If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Concerns about a staff member, governor, trustee, supply teacher, volunteer or contractor

8.1 HISP recognises the possibility that adults working in the Trust may harm children, including trustees, governors, volunteers, supply teachers and agency staff.

8.2 The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the Trust, including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children;

or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This includes behaviour or incidents that have occurred in and outside of the Trust or individual school.

8.3 If a concern or allegation of abuse arises against any person working or volunteering on the school site (other than the Head), this must be reported to the Head/Director of the setting immediately and not discussed directly with the person involved. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. The Head/Director of the setting will inform the HISP Director of School Improvement and Safeguarding immediately.

If the concerns/allegations are about the headteacher, speak to the chair of governors.

Allegations against the Director of School Improvement and Safeguarding or any member of the Executive Team must be reported to the CEO.

Allegations against the CEO must be reported to the Chair of Trustees.

Allegations against the Chair of Governors or Chair of Trustees must be reported to the CEO.

Alternatively, staff can report the concern through the Trust Whistleblowing Procedure or directly to the Local Authority Designated Officer (LADO).

The Head/Director will collaborate with the HISP Director of Safeguarding to consider if the concern or allegation meets the threshold for LADO intervention. Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer as soon as possible within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made, and the police will be contacted if necessary.

8.4 A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post because of safeguarding concerns or would have been removed if they had not resigned.

If an allegation is made relating to an incident that happened when an individual or organisation was using school premises for the purposes of running activities for children, schools will follow the same safeguarding policies and procedures, including informing the LADO.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher or Director, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

8.5 Early Years Providers: Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix K for more detail).

Allegations of abuse made against other pupils (child-on-child)

9.1 At HISP we recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

9.2 Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

9.3 Record keeping

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

When a child has made a disclosure, the member of staff/volunteer should;

- record it as soon as possible after the conversation on CPOMs
- not destroy the original notes in case they are needed by a court (this includes notes taken by the member of staff); this will be uploaded onto CPOMs as a document linked to the recorded incident.
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- use a CPOMS body map to indicate the position of any injuries if relevant; and
- record verbatim statements and observations within records, rather than interpretations or assumptions

Further information on record keeping can be found in section 20.

9.4 Creating a supportive environment in school and minimising the risk of child-on-child abuse

HISP recognises the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL, alongside other SLT members will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent the school from coming to its own conclusion about what happened and imposing a follow up/consequence accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Sharing of nudes and semi-nudes ('sexting')

10.1 Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

10.2 Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting (which must be recorded in line with local setting recording procedures) with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual

- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix F for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

10.3 Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

10.4 Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

10.5 Referring to the police

If it is necessary to refer an incident to the police, this will be done through the local procedures at the setting.

10.6 Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMs. The record-keeping arrangements set out in section 20 of this policy also apply to recording these incidents.

10.7 Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of the school's relationships education / relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident. Some schools within HISP may choose to have a separate policy to cover this area.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Reporting systems for pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Individual settings must share in a way that is easily understood by all pupils the reporting system covering:

- What it looks like for pupils in terms of who they should report concerns to
- How you make pupils aware of the reporting systems and processes, e.g. through discussion in your relationships/sex education curriculum
- How pupils will feel safe in submitting any concerns, e.g. reassurances provided following disclosures]

At Thornden School we use the following system:

- Report a Concern link. This is found on
 - Thornden School homepage
 - Student Bulletin

- Weekly assignment on Satchel where the link is sent as a reminder
- All students are also encouraged to speak to all staff should they have any concerns
- This is shared with students through:
 - Termly written reminders via email
 - Posters in all tutor rooms and other key areas of the school
 - Assemblies
 - Weekly Satchel emails

Online safety and the use of mobile technology

12.1 Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. This includes meeting the DfE's Filtering and Monitoring and Digital and Technology Standards, including cyber security. Accordingly, the Trust and individual settings' Online Safety Policies and associated Acceptable Use Policies are written in line with these standards, in addition to KCSIE (September 2024) 'Teaching Online Safety in Schools' 2019, statutory RSHE guidance 2019 and other relevant statutory and non-statutory guidance.

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

To address this, all schools and settings must:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

12.2 The four key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

12.3 To meet our aims and address the risks above, individual schools will:

- Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

HISP schools and Learning Partnerships recognise that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

HISP schools and Learning Partnerships will treat any use of AI to access harmful content or bully pupils or other adults in line with this policy and other applicable policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Notifying parents or carers

Where appropriate, schools will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If the DSL, in collaboration with the Head, identifies that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

Pupils with special educational needs, disabilities or health issues

HISP recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

Schools offer extra pastoral support for these pupils and must ensure that this is clearly communicated to all stakeholders.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing (unexplainable and/or persistent absences from education) education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Looked-after, previously looked-after children, children in kinship care

All schools will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

Each school has an appointed designated teacher, at Thornden this is Adam Thomas who is Deputy Headteacher and DSL, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after, previously looked-after, and kinship care children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after, previously looked-after, and kinship care children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See local setting behaviour policies for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerabilities. We will consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

Complaints and concerns about school safeguarding policies

HISP's complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action.

Complaints are managed by the Head, and governors, senior Trust staff and in exceptional circumstances, the CEO. Complaints from staff are dealt with under HISP complaints and disciplinary and grievance procedures.

19.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff

19.2 Other complaints

Each local setting must have clear processes to regarding safeguarding-related complaints of other types, for example, those related to pupils or premises.

Early years providers should take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.75).

19.3 Whistle-blowing

Please refer to the HISP Whistleblowing policy.

Record-keeping

Records are held in line with the records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing on CPOMs. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept and recorded on CPOMs.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school (typically until the age of 25 or in line with local authority guidance – however, if records are linked to any ongoing investigations or significant incidents, they may need to be retained for longer periods.)

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within

- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Training

21.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the Trust-wide, whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners ((a) the local authority (b) an integrated care board for an area any part of which falls within the local authority area (c) the chief officer of police for an area any part of which falls within the local authority area
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, at least once a half term (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

21.2 The DSL and DDSLs

The DSL and DDSLs will undertake full child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

21.3 Trustees and Governors

All trustees and governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of trustees or chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

21.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school or setting will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

21.5 Staff who have contact with pupils and families – Early Years Providers

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Policy monitoring arrangements

This policy will be reviewed **annually**. At every review, it will be approved by the full Trust board.

Links with other policies

This policy links to the following setting specific or Trust policies and procedures:

- Behaviour
- Disciplinary
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Privacy notices
- Whistle-blowing
- IT acceptable use

Appendix A Key Contacts for Safeguarding at HISP

1.1 School-Specific Safeguarding Leads

School specific contacts, including the Heads and the Designated Safeguarding Leads (DSL) can be found at section 1.9 of this appendix.

1.2 Trust-Wide Safeguarding Leads

The Safeguarding Trustee, the Director of Safeguarding for HISP can be contacted using the details below:

Safeguarding Trustee:

Ann Langran

Email: via - k.lewis@hispmat.org

Phone number: 023 8254 1374 / 07956735095

Director of School Improvement and Safeguarding:

Teresa Enriquez-Hayes

Email: t.enriquez-hayes@hispmat.org

Phone number: 07951 064556

1.3 Local Authority Integrated Multi-Agency Contacts

When a professional working in Hampshire, Isle of Wight, Portsmouth, Southampton, or Bournemouth, Christchurch and Poole assesses that a child/family requires additional support, they need to complete an inter-agency referral or contact form as per local processes and share this with the relevant Multi-Agency Safeguarding Hub (MASH) or Children's Resource Centre (CRS). The use of the Threshold Guidance will assist this process and help inform the practitioner's decision-making ([Welcome | Hampshire, Isle of Wight, Portsmouth and Southampton \(hipsprocedures.org.uk\)](#))

If a professional believes that a child may be at risk of significant harm, they should both telephone the MASH/CRS (or out of hours children's services) and fill in an interagency form.

- Hampshire MASH: 0300 555 1386
- Isle of Wight MASH: 0300 300 0117
- Portsmouth MASH: 0845 671 0271
- Southampton CRS: 02380 83 3004
- Bournemouth, Christchurch and Poole: Children's First Response MASH – BCP Council: 01202 123334, childrensfirstresponse@bcpcouncil.gov.uk , [Inter-Agency Referral Form](#)

1.4 Local Authority Designated Officer (LADO)

Bournemouth, Christchurch and Poole

- lado@bournemouth.gov.uk 01202 456744
- LADO@bcpcouncil.gov.uk 01202 817 600

Hampshire

- [LADO service initial enquiry form- \(office.com\)](#) 01962 876364

Southampton

- lado@southampton.gov.uk 023 8091 5535/ 07500 952 037
- [LADO Notification Form](#)

1.5 Out of hours service

Should you need to contact children's Social Care urgently during the evening, at night or at the weekend, phone the out of hours team on:

- **Bournemouth, Christchurch and Poole:** 01202 738256 childrensoohs@bcpcouncil.gov.uk
- **Hampshire:** 0300 555 1373 out.of.hours@hants.gov.uk
- **Southampton:** <https://www.southampton.gov.uk/health-social-care/children/child-social-care/child-protection.aspx> 023 8083 3344

1.6 Whistleblowing Officer

The Trust Whistleblowing Policy [2024-05 Whistleblowing \(hispmat.org\)](#) outlines that you should usually report your concern to the Headteacher/Head of school/Head of Organisational Unit. However, if the concerns relate to one of these roles, it should be reported to an Executive Headteacher or the Executive Director of Education. If the concern is in relation to an Executive Headteacher the Executive Director of Education needs to be informed; if the concern is in relation to the Executive Director of Education, it must be reported to the CEO. If it relates to the CEO, it should be reported to the Chair of our Trust.

1.7 Other contacts

- Professional Online Safety Helpline 0344 381 4772 or helpline@saferinternet.org.uk
- NSPCC 0808 800 5000 or help@nspcc.org.uk – 24-hour service.
- Childline 0800 1111 <https://www.childline.org.uk/>
- Police 111 or 999 in emergency

1.8 Safeguarding Adults

An adult at risk is defined as any person who is 18 and over, needs care or support, is experiencing, or is at risk of, abuse or neglect, and as a result of their needs is unable to protect themselves against the abuse or neglect. Contact details for the Safeguarding Adults Teams can be found below:

- Bournemouth, Christchurch and Poole: 01202 794300 bcpsafeguardingadultsboard@bcpcouncil.gov.uk
- Hampshire: 0300 555 1386 (out of hours 0300 555 1373)
- Southampton: 023 80834307 Safeguarding.PartnershipsTeam@southampton.gov.uk

1.9 HISP School Safeguarding Contacts

School	Contact Number	Head	DSL
Portswood	023 8055 5885	Anthony Head (Headteacher) tony.head@portswoodpri.org.uk	Ian Howie ian.howie@portswoodpri.org.uk
Tanners Brook	023 8077 1659	Jess Paul (Executive Headteacher) j.paul@hispmat.org	Lisa Welch

		Ingrid Dowse (Head of School) ingrid.dowse@tannersbrookpri.org.uk	lisa.welch@tannersbrookpri.org.uk
Carisbrooke College	01983 524651	Natalie Sheppard (Executive Leader) Karen Begley (Head of School) karen.begley@iwef.org.uk	Michael Peake michael.peake@iwef.org.uk
Crofton School	01329 664251	Simon Harrison (Headteacher) sharrison@croftonschool.co.uk	Paul Williams pwilliams@croftonschool.co.uk
Highcliffe School	01425 273381	Patrick Earnshaw (Headteacher) pearshaw@highcliffeschool.com	Sarah Giller sgiller@highcliffeschool.com
Medina College and VI Form)	01983 526523	Lisa Croke (Executive Leader) l.croke@hispmat.org Phil Pearce-Jones (Head of School) phil.pearce-jones@iwef.org.uk	Phil Pearce-Jones phil.pearce-jones@iwef.org.uk Dave Mumford (VI Form) david.mumford@iwef.org.uk
Danebury School	01264 810555	Jo McKeown (Executive Headteacher) j.mckeown@hispmat.org Nicky Goodridge (Head of School) goodridgen@testvalley.hants.sch.uk	Anna Collins collinsa@testvalley.hants.sch.uk
Thornden School	023 8026 9722	Caroline Lowing (Headteacher) c.lowing@thornden.hants.sch.uk	Adam Thomas a.thomas@thornden.hants.sch.uk

1.10 HISP Learning Partnerships Safeguarding Contacts

Partner	Contact Number	Lead	DSL
Inspiring Future Teachers	023 8024 6950	Helen Shaw (Director of Inspiring Future Teachers) h.shaw@hispmat.org Georgina Crooks (ITT Strategic Lead) g.crooks@hispmat.org	Georgina Crooks g.crooks@hispmat.org
HISP Teaching School Hub		David Higginbottom (Deputy Director TSH) d.higginbottom@hispmat.org	David Higginbottom d.higginbottom@hispmat.org

Appendix B Inspiring Future Teachers (IFT) Safeguarding and Child Protection Policy

As part of HISP, Inspiring Future Teachers adopt the HISP Trust Safeguarding and Child Protection policy.

The HISP Safeguarding and Child Protection Policy outlines in detail the definitions, responsibilities and processes for managing any safeguarding concerns, including allegations of abuse, made against an adult working in a school as part of the IFT partnership. This appendix intends to summarise the management of concerns specifically related to trainee teachers and should be read in conjunction with the main policy.

Definitions:

- An allegation of abuse is defined as any case in which it is alleged that an adult has behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- A low-level concern is defined as a concern relating to behaviour that is inconsistent with the SCITT's policies, such as Code of Conduct, but does not meet the threshold for an allegation of abuse, as outlined above.

Key Principles:

- At all times, IFT will work in full accordance with the statutory guidelines set out within the relevant section of DfE statutory safeguarding guidance, as well as with local guidelines issued by the relevant Local Authority.
- Trainees will be issued with relevant documentation pertaining to professional expectations (e.g. Code of Conduct & Acceptable Use of ICT Policy, IFT Learning Agreement) as well as policies for the school/s in which they are based so that they understand and are trained to implement safe working practice with children.
- Any concern about a Trainee, whether that is a low-level concern or one meeting the threshold to be considered an allegation of abuse, will first be reported to the Headteacher of the school where the trainee is based. Exceptionally, in the Headteacher's absence, the report may be made to the next senior member of staff who is acting as the Headteacher in their place.
- Upon receipt of a low-level concern or allegation, the Headteacher will take timely and appropriate action to respond to this in line with statutory guidance and the HISP Trust safeguarding and child protection policy, following the relevant process pertaining to the level of concern. Where required, for a concern indicating an allegation of abuse, this may include a referral to the Local Authority Designated Officer (LADO).
- The Headteacher will also inform the IFT Hub Lead, who will liaise with the IFT Director/DSL, and they will work with them to support and oversee the response to the concern. They will jointly agree to any amendments or changes to the trainee's placement, such as suspension or transfer (see below).
- The Headteacher and the IFT Hub Lead will keep a written record of all actions taken to address the concern, as per the main policy.
- If the concern also necessitates the involvement of a relevant HR policy in order to reach a resolution, such as disciplinary, the IFT Cause for Concern Procedures will be followed.
- In the event of two or more concerns being logged for the same trainee, the Headteacher and National ITT Lead together will review any emerging pattern of concern to identify any required areas of additional support, training and guidance for the trainee, in line with the IFT Support Plan Procedure.

Additionally:

- **Aims and Values**

IFT is committed to the safeguarding and welfare of children. Staff, trainees and partners (including trainers, mentors and professional tutors) are expected to share this commitment. All children have a fundamental right to be protected from harm and to have access to an educational environment in which they feel safe and secure. Safeguarding concerns are expected to be handled sensitively and professionally, and always with the health and safety and the needs of the child as the focus. The aim of this IFT policy is to ensure that staff, trainees and partners are aware of the responsibilities towards safeguarding and can act with clear direction and with knowledge of good practice and procedures.

2. Core principles

The core principles of this policy are:

- the welfare of children is paramount
- to provide a learning environment for children which is safe and secure
- to teach children how to keep themselves safe and provide structures for them to raise concerns if they are worried or at risk of harm
- children and young people have a right to be treated with respect and dignity, as do the adults who work with them
- it is the responsibility of all adults to safeguard and promote the welfare of children and young people
- to recognise that all children may be vulnerable to abuse, but be aware that some children have increased vulnerabilities due to special educational needs or disabilities
- to maintain a robust recording system for any safeguarding or child protection information
- all children and young people must have the opportunity to express their views about decisions taken about their lives
- to create and embed a culture of openness, trust and transparency in which IFT's values and expected behaviours, set out in the code of conduct are lived, monitored and reinforced constantly by all partners.

3. Recruitment of Trainees

Before commencing the IFT training programme, IFT will undertake DBS Enhanced Disclosures and Prohibition for Teaching for all trainees to ensure compliance with DfE requirements. For salaried trainees, these checks are completed by the employing school.

A record of all checks on trainees will be held on the Single Central Record. A satisfactory check is defined as having no criminal convictions (including cautions, reprimands and final warnings) that might impact on undertaking the role of a trainee teacher. Overseas police checks will be carried out for those who have lived outside the UK for six months or more within the last five years, in line with Keeping Children Safe in Education (2024) and the ITT Criteria and Supporting Guidance ([Initial teacher training \(ITT\): criteria and supporting advice, academic year 2024-25 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/initial-teacher-training-itt-criteria-and-supporting-advice-academic-year-2024-25.pdf))

All registered trainees must report any subsequent criminal convictions to the ITT Hub Lead. (who will inform the IFT policy and compliance lead). Failure to do so will result in disciplinary action being taken. It is the responsibility of the trainee to complete the DBS application correctly. Where a DBS certificate shows a conviction, caution, reprimand or final warning, the ITT Hub Lead will liaise with the placement school Headteacher who will refer it to the Director of IFT. The Director of IFT will liaise with HISP's Accounting Officer who will have the final decision on satisfactory DBS checks.

If evidence comes to light where convictions or safeguarding concerns have been withheld, the IFT Hub Lead, in conjunction with the IFT Director and the IFT Policy and Compliance Lead, will investigate the evidence and make a decision as to the trainee's placement on the Programme. This may lead to their place being

terminated and the trainee withdrawn on the basis of the trainee having withheld information related to criminal convictions.

If the application discloses a criminal conviction, then this is dealt with at the interview stage. The IFT Central Board will decide with the Director of IFT, the Director of School Improvement and Safeguarding, the Executive Director of People, and the Accounting Officer if this is a barrier to the programme.

If the DBS shows convictions, offences, cautions or warnings then these will be discussed with the HISP Executive Director of People to establish an appropriate understanding of what poses a barrier for commencing the programme.

Candidates who are unsuited to working with children may not have any previous convictions, and providers should be vigilant during the selection process. Providers or employing schools have a duty to ensure that trainees are properly managed and supervised and that, if they have concerns, information is referred to the police and the DBS.

Candidates who have lived or worked outside the UK must undergo the same checks as all other staff in schools and colleges. In addition, further checks should be carried out so that events that occurred outside the UK can be considered. The Home Office has published guidance on criminal record checks for overseas applicants.

Providers and employers must check that candidates are not:

- subject to a prohibition order issued by the Secretary of State
- prohibited to teach in another country of the European Economic Area (EEA)

The list of prohibited teachers is on the Teacher Services system.

Our staff recruitment policies and practices are rigorous and comply with safe recruitment and selection requirements. We always pursue identity checks and qualification checks, and we take up and scrutinise written references.

- Identity checks must be carried out on all conditional offers made before the commencement of training
- IFT completes online searches as part of their due diligence checks on applications.
- All successful applicants will have an enhanced DBS check before starting the programme.
- All trainees should wear their placement school ID badge when on placement.
- The trainee should bring in their original DBS certificate to the IFT Hub Lead, this is noted on their SCR, which is accessible to the central IFT Team.
- All trainees will receive Child Protection, Safeguarding and Prevent training during their training. This includes online units from the National College as part of induction with completion certificates are uploaded to Mosaic.
- Trainees also participate in school level training.
- All placement schools must make their Safeguarding, Child Protection policies and Code of Conduct available to the trainee and induct them on the policies and procedures. These must be adhered to by the trainee.
- Trainees need to follow the placement school's policy on taking photographs of children. Personal cameras, personal mobile phones or other personal devices should not be used to take photographs of pupils
- All trainees are to sign a register when attending centre-based and subject/phase-based training

4. Training and Development

For IFT staff and trainees to be able to understand and discharge their safeguarding and child protection duties, IFT will ensure all trainees carry out safeguarding training in their placement school as well as in their

centre-based training. We will also ensure all IFT staff and trainees are up to date with safeguarding procedures and national initiatives and all trainees have read, understood and signed the IFT specific contract.

5. Reporting concerns

If a member of IFT staff is visiting a school and receives a disclosure from a member of the school community or notices anything of concern, they will follow the school's safeguarding procedures for reporting and referring.

6. Allegations against IFT trainees or staff

IFT recognises there are situations where it is possible for trainees or staff to conduct themselves in a manner that may be deemed to be causing harm to children and takes any allegation seriously. IFT is guided by local procedures for managing allegations against staff or trainees.

If a concern is raised about a member of IFT staff, this should be referred to Director of IFT.

If a concern is raised about the Director of IFT it should be referred to the Executive Director of Education.

Allegations against staff will follow the employing school's or HISP safeguarding and child protection policies and disciplinary procedures.

If a concern is raised about a trainee on the IFT course, the ITT Hub Lead for that course must be informed immediately.

6.1 Low-level concerns

'Low-level' concerns are those that are deemed not to have met the harm threshold as set out in KCSIE 2024. 'Low-level' does not mean that it is insignificant. Low-level concerns could include a trainee who is inconsistent with the staff code of conduct, has favourites within the classroom or takes photos of children on their mobile phone, contrary to the school policy. This is not an exhaustive list, and low-level concerns may arise in several ways and from several sources.

All low-level concerns should be referred to the ITT Hub Lead. The school's Lead Mentor and the ITT Hub Lead will have a formal, recorded conversation with the trainee about the concern and clearly explain the correct procedures that should be followed. If it is appropriate, they may be placed on a Cause for Concern that relates to Part 2 of the Teachers' Standards. The Cause for Concern procedures are documented in the Course Handbook. All low-level concerns are reported to the Executive Partnership Board of IFT.

All low-level concerns should be recorded in writing, including the details of the concern, the context in which the concern arose, and the action taken. The record will be saved in the trainee's electronic, password protected folder. As per the GDPR policy, trainees' files are saved for seven years following their completion, withdrawal or suspension from the course. Low-level concerns will only be used in references if they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

6.2 Concerns or allegations that meet the harm threshold

Allegations that meet the harm threshold are defined in KCSIE 2024 as being where any person who works in a school or college that provides education for children under 18 years of age, 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 he or she 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.

In the event of an allegation against an IFT staff member, the HISP safeguarding policy will be followed. In the event of an allegation against a trainee that meets the threshold, the placement school must follow their school's safeguarding policy, including looking after the welfare of the child and investigating and supporting the person subject to the allegation. The placement school must also inform the IFT Hub Lead - Director of IFT immediately. The placement school or the IFT Hub Lead may ask the trainee to leave the school premises immediately, temporarily pausing the placement, while investigations are conducted. The Director of School Improvement and Safeguarding, Teresa Enriquez-Hayes (t.enriquez-hayes@hispmat.org) must be made aware of the investigation by the IFT Director.

The Headteacher of the placement school in collaboration with the ITT Hub Lead and Director of IFT will inform the Local Authority Designated Officer (LADO). When dealing with allegations, the placement school and IFT should:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently,
- provide effective protection for the child and support the person subject to the allegation.

Following investigation by the LADO that leads to no further action, the Director of IFT and LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerns and by whom.

Where further enquiries are required, the trainee may be suspended* (*Suspension may include a withdrawal from or failure of the course) from the course, following advice from the LADO. The Director of IFT will record the rationale and justification for such a course of action, writing to the trainee to inform them of the decision within one working day. DfE Register will be updated by the IFT administrators. The process for allegations that meet the harm threshold, as set out in KCSIE 2024 will be followed.

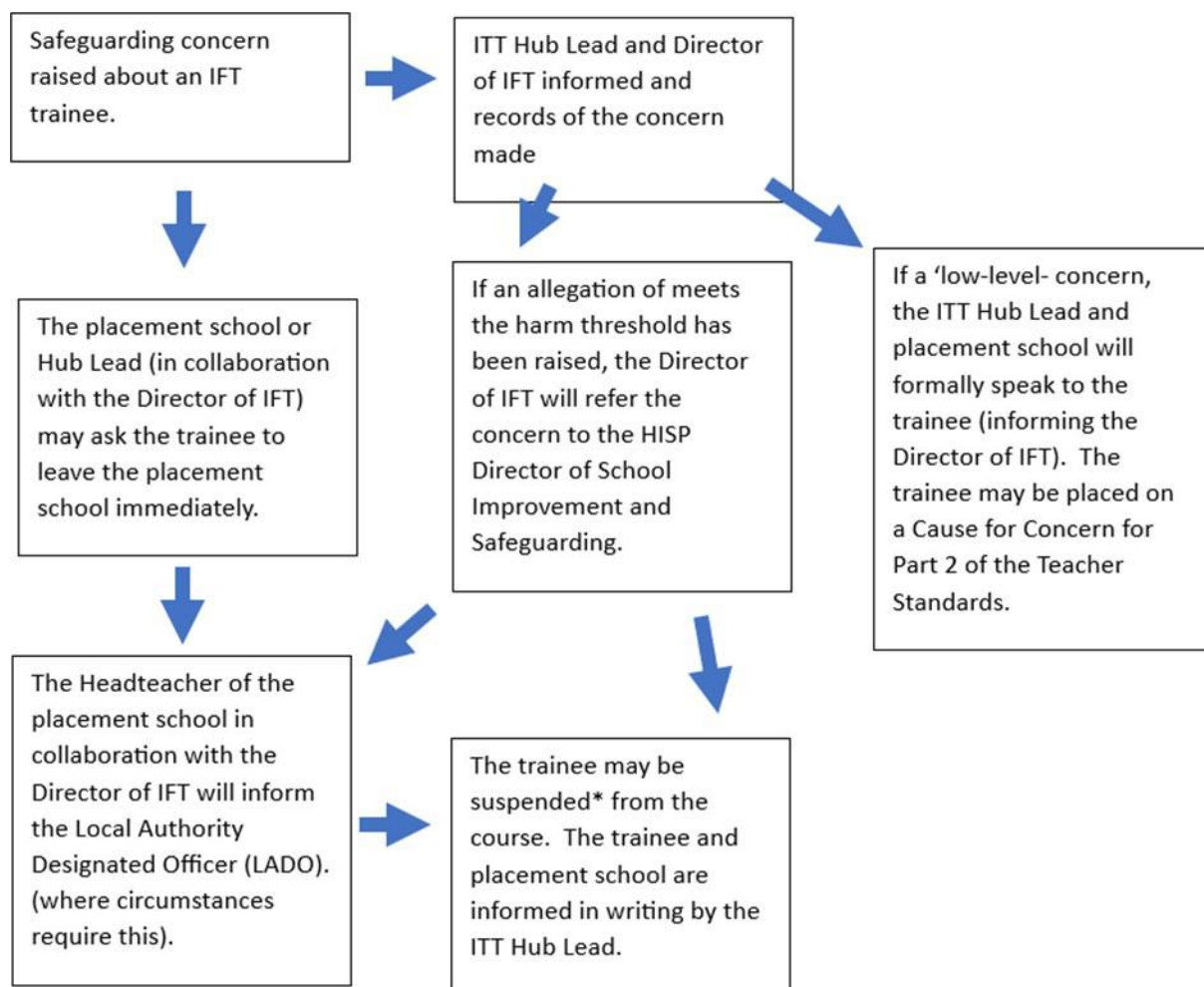
Records of the allegation which are found to be malicious or false will be removed from the trainee's records unless they give consent for retention of the information. For all other allegations (substantiated, unfounded and unsubstantiated), a record of will be kept securely in a password protected folder until the trainee has reached normal pension age or for a period of 10 years from the date of the allegation. The record will include:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

All trainee records will be kept in accordance with all applicable data protection legislation. Trainee records will be maintained according to the Hub organisation's data policies and retention schedules, with coordination between the Hub and IFT to ensure records are available, accurate, and securely stored.

If a trainee is removed from the programme because they have harmed or pose a risk of harm to children, or if IFT, as the accredited ITT provider, would have removed the trainee had they not left, the Director of IFT (in collaboration with the IFT Hub Lead, the Director of School Improvement and Safeguarding) will seek guidance from DBS and inform DfE by contacting itt.safeguarding@education.gov.uk

6.3 Reporting safeguarding concerns about an IFT trainee flowchart



Appendix C Types of abuse

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to:

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

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

Appendix D Safer recruitment policy

To be read in conjunction with the HISP Recruitment and Selection Policy

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

HISP expects refresher training to be undertaken regularly; as a minimum every three years or as new guidelines and best practices emerge.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our setting's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
 - Sign a declaration confirming the information they have provided is true

All setting will carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we will carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

- When interviewing candidates, we will:
- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: criminal records checks for overseas applicants
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
 - Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

HISP schools with pupils aged under 8: We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Our schools with pupils aged under 8: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee teachers

See Appendix B for the Inspiring Future Teachers Safeguarding and Child Protection Policy details.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Our schools with pupils aged under 8:

- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Members, Trustees, Governors

All trustees, local governors and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix E Allegations against staff (including low-level concerns) policy

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, 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 – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work within the Trust.

The case manager will seek views and advice from the Director of Safeguarding, HR, and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps (with advice and guidance from the HISP Director of School Improvement and Safeguarding):

- Inform the Director of School Improvement and Safeguarding and HISP HR.
- Conduct basic enquiries in line with HISP procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate when completing the suspension/alternative duties risk assessment.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Professional association support is encouraged alongside HISP provided support services.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- Early years providers will: Inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school, in collaboration with the Director of School Improvement and Safeguarding, will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school, in collaboration with the Director of School Improvement and Safeguarding, will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The case manager, in collaboration with the Director of School Improvement and Safeguarding, will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager, in collaboration with the Director of School Improvement and Safeguarding, will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the Trust/school's safeguarding system
- Ensuring that each school has a clear and simple way to report their concern to the Head

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the code of conduct. The headteacher will be the ultimate decision-maker in respect

of all low-level concerns, though they may wish to collaborate with the DSL and the Director of School Improvement and Safeguarding

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix F Specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing (unexplainable and/or persistent absences) from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an

exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in this policy.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

This policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

- Ensure that a Prevent risk assessment has been completed
<https://www.gov.uk/government/publications/prevent-duty-risk-assessment-templates>

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

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

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

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 of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

Each school will ensure that they have clearly communicated procedures and processes that will be followed if a child is not collected at the end of the session/day.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

Each school will ensure that they have clearly communicated procedures and processes that will be followed if a child goes missing.

Appendix G DSL Response to Harmful Sexual Behaviour

When responding to a report of harmful sexual behaviour, DSLs will:

- Take immediate action to safeguarding and protect the victim, the child displaying harmful sexual behaviour and any other children or staff who may be at risk
- Triage the incident guided by the Hackett Continuum of Harmful Sexual Behaviour
- Inform the victim's parents or carers (unless doing so would place the victim at risk)
- Inform the parents of the child who is alleged to have displayed harmful sexual behaviour (in consultation with police, if necessary)
- Consider whether the report will be managed internally, via early help (e.g., for non-violence cases of harmful sexual behaviour), via referral to children social care or to police, ensuring that the response is proportionate
- Make a referral to children's social care if a child has suffered, or is at risk of suffering, significant harm or imminent danger
- Report incidents of rape, sexual assault by penetration and sexual assault to the police
- Balance the victim's wishes against their duty to protect the victim and other children
- Offer appropriate specialist support for the victim and the child displaying harmful sexual behaviour
- Do all they reasonably can to protect the anonymity and ongoing safety of all children involved
- Complete a risk and needs assessment for all cases of sexual violence, taking in to account all victims, all children displaying harmful sexual behaviour, the time and location of the incident and any action required to make the location safer. Risk assessments will be recorded, kept under review at all times and shared with staff on a need-to-know basis in order to keep children safe

In addition to the above, DSLs will consider and record the incident on CPOMS/my concerns. This DSL will maintain an understanding of intra familial harms and any necessary support for siblings following incidents.

DSLs and DDSLs will use the above to form the rationale for any decisions made. Decisions and rationales will be recorded on CPOMS/my concerns.

Where a DSL/DDSL makes a referral to police or social care against the victim's wishes, this will be handled carefully and sensitively, with adequate time given to explaining the decision and rationale to the victim. In cases which are found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who has made the allegation is in need of help and/or may have been abused by someone else. Where this is the case, consideration will be given to referring to children's social care.

In cases which are shown to be deliberately invented or malicious, the school will consider taking disciplinary action in line with the Behaviour and Discipline Policy.

Managing Police Involvement in Case of Harmful Sexual Behaviour

When a report has been made to police, the DSL will:

- Consult with police and agree what information can be disclosed to staff and others, including the parents of the child who is alleged to have displayed harmful sexual behaviour, and how to protect the victim and their anonymity.
- Work closely with the police to ensure that any actions taken by school do not jeopardise the police investigation, but will not wait for an outcome before taking steps to protect all children involved and in the wider school community

- Carefully consider the balance between managing risk and the rights of an unconvicted person, particularly when the police make use of bail conditions
- Continue to offer support to the child who has allegedly displayed harmful sexual behaviour
- Update the risk assessment in cases where the police find a child guilty of an offence, to ensure relevant protections are in place, and consider any suitable action in line with the Behaviour and Discipline Policy
- Continue to support all children involved for as long as is necessary in cases where the police outcome is “no further action”

Disciplinary action can be taken by the school whilst other investigations by children’s social care or police are ongoing. The school will seek to form a conclusion, on the balance of probabilities, about what happened and impose a penalty accordingly. The school will work with partner agencies to avoid prejudicing an investigation and/or subsequent prosecution by the action taken.

Ongoing Management and Support for Children

When safeguarding and supporting the victim, the DSL will:

- Empower the victim to retain as much control of the process as possible
- Enable the victim, if they wish, to continue their normal routine
- Explore and offer a range of internal and external specialist support, if required
- Ensure that staff are sensitive to the potential needs of the victim
- Avoid taking action to isolate the victim, in particularly from supportive peer groups, but work with victims to consider adaptations to the school timetable if this is in line with their wishes
- Provide all necessary support to the victim to remain in the school, but support the wishes of the victim and their family if their preference is to consider alternative provision or alternative schools

When safeguarding and supporting the child who has allegedly displayed harmful sexual behaviour, the DSL will:

- Seek to identify and respond to any unmet needs
- Consider and manage any risks posed to other children
- Support the child to prevent re-offending and address any underlying trauma that may be causing their behaviour
- Implement a comprehensive safeguarding management plan to support the child to have continued access to education. This may involve working with other schools or providers of alternative provision.

Monitoring Harmful Sexual Behaviour

The DSL will conduct regular reviews of all incidents of harmful sexual behaviour, to ensure that incidents have been recorded and responded to correctly, and that all children have received appropriate support.

Appendix H Elective Home Education (EHE)

Elective Home Education (EHE)

Whilst HISP recognises that many home educated children have an overwhelmingly positive learning experience, this is not the case for all. This can mean some children are less visible to services that are there to keep them safe and supported in line with their needs.

All staff will encourage parents to send their children to school to embrace the benefits of being a part of the HISP community, particularly those who are vulnerable. Under no circumstances will any school attempt to pressure or encourage a parent to home educate.

Where an application for EHE is made, the school will seek to meet with parents to determine whether the decision to home educate is in the best interests of the child. A summary of this meeting will be recorded on CPOMS/my concerns.

The school will also look to engage the Local Authority and other relevant agencies at the earliest opportunity to ensure that parents and carers have considered what is in the best interests of their child. This is particularly important where a child has SEND and/or a social worker and/or is otherwise vulnerable. Where a child has an EHCP, the local authority will need to review the plan, working closely with parents and carers.

If at any stage safeguarding concerns are identified, these will be referred to the Multi-Agency Safeguarding Hub without delay, in line with the procedures outlined above.

In any event, the Local Authority and the Trust will be informed of a parental request for EHE.

If a parent wants to admit their child to a school, the normal processes for in-year admissions applications will be followed.

The Headteacher will sign off on all EHE.

Appendix I Single Central Record

Each school will maintain a Single Central Record (SCR) of all school employees, agency staff, volunteers (including governors), contractors and any others involved in regulated activity (including Alternative Provision).

The SCR will be overseen and directly managed by the Head, with the support of the DSL, who is responsible for safeguarding in the school. It is the responsibility of the HR Administrator/equivalent within the school to maintain the information on the SCR.

Audits will be conducted half-termly, by the Designated Safeguarding Lead and Head alternately. The Trust HR School HR Partner will complete annual audits of the SCR, and the Director of School Improvement and Safeguarding will include a SCR and personnel file check in the annual safeguarding review.

The details of an individual should be removed from the SCR once they no longer work for the school and/or Trust.

A SCR will be maintained centrally for all Central Team, Trust-wide members of staff, Directors, and Trustees. This will be shared with all HISP schools as and when it is updated.

Statutory requirements as outlined in KCSiE 2024 will be met:

- the SCR covers all staff, even if they only work for one day – for academies and free schools, this includes the members and trustees of the academy trust
- for agency and third-party staff, the SCR records:
 - whether the school has received written confirmation that the employment business supplying the member of staff has carried out the relevant checks and obtained the appropriate certificates
 - the date the school this confirmation was provided
 - whether details of any enhanced DBS certificate have been provided in respect of the member of staff
- for all remaining staff (including teacher trainees on salaried routes), the SCR must record whether the following checks have been carried out (or certificates obtained). These include:
 - an identity check
 - a standalone children's barred list check
 - an enhanced DBS check (with children's barred list check) requested/certificate provided
 - a prohibition from teaching check
 - further checks on people who have lived or worked outside the UK
 - a check of professional qualifications, where required
 - a check to establish the person's right to work in the UK
 - for academies and free schools, if the section 128 checks have been carried out for those in management positions
- the SCR indicates the date when each check listed above was completed (or certificate obtained)

Appendix J. Record keeping and File Transfer

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

When a child has made a disclosure, the member of staff/volunteer should;

- record it as soon as possible after the conversation, using CPOMS/ my concerns
- not destroy the original notes in case they are needed by a court (this includes notes taken by the member of staff);
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- use a CPOMS/my concerns body map to indicate the position of any injuries if relevant; and
- record verbatim statements and observations within records, rather than interpretations or assumptions

All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

Records will include:

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

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with the records retention schedule.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. The transfer will take place as soon as possible, and within 5 days for an in-year transfer and within 5 days of the start of a new term. Confirmation of receipt will be obtained. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

When receiving child protection files for new pupils, schools will ensure that key staff (such as the DSL and SENDCO) are aware, as required.

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 is in place to protect the personal information of individuals. It does not prohibit information about children being shared with specific authorities if it is for the purposes of safeguarding children and individuals at risk. Information that could be relevant to keeping a child safe should be shared so that informed decisions can be made about a child's welfare.

We have a duty of care for our pupils and safeguarding is the priority. GDPR does not 'trump' safeguarding. Processing safeguarding data is necessary for compliance with our legal obligation to which HISP is subject. Therefore, consent is not needed for the effective sharing of safeguarding information between a school and relevant authorities.

Upon receipt of any request regarding direct access to school documentation on a Child Protection file, the Head and DSL will be informed, and a decision taken on the appropriate way forward in accordance with the Data Protection Policy.

Any external individual or organisation contracted by a school to work with their pupils must report any child protection incidents or disclosures from pupils to the Head or DSL at the earliest opportunity. Such bodies will, as part of their contractual arrangements with the school, be required to work in accordance with the Trust's child protection and safeguarding policy.

Appendix K Additional Information

Use of physical interventions

There is an absolute ban on the use by any member of staff of any form of corporal punishment. This includes any physical contact which is deliberately intended to punish a pupil, or which is primarily intended to cause pain, injury or humiliation.

Staff should avoid physical contact with children as far as possible. HISP recognises that it is important to allow children to do what they can for themselves, but depending on age and circumstances, it may be necessary for some physical contact to take place; (e.g., a child who is hurt, who needs instruction in the use of a particular instrument/piece of equipment, safety issues such as the need to prevent a child hurting themselves, running into the road etc.).

Section 93 of the Education and Inspections Act 2006 enables school staff to use 'reasonable force' to prevent a pupil from:

- committing any offence (or, for a pupil under the age of criminal responsibility, what would be an offence for an older pupil);
 - causing personal injury to, or damage to the property of, any person (including the pupil themselves);
- or
- prejudicing the maintenance of good order and discipline at the school or among any pupils receiving education at the school, whether during the teaching session or otherwise.

Reasonable force means using no more force than is needed. When using reasonable force in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, staff will recognise and consider the additional vulnerability of these groups and seek to reduce the need to use reasonable force by planning positive and proactive behaviour support and working with parents and carers.

Authorised school staff may, under certain circumstances, use reasonable force to carry out a search. These include, but are not limited to, searches for knives and weapons, alcohol and illegal drugs, stolen items and items that could be used to commit an offence or cause injury to self or others, as identified in Paragraph 3 of the DfE Searching, Screening and Confiscation guidance. In the event of searches or physical restraint being needed, parents will be informed the same day and all searches and uses of physical intervention will be recorded on CPOMS/my concerns.

Early years settings within schools

As an early year's provider delivering the Early Years Foundation Stage (EYFS), all HISP primary schools aim to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance <https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

All HISP Primary schools will ensure that all children in the nursery and reception classes, and/or two-year old provision, are able to learn, develop, be safe and healthy by providing;

- a safe secure learning environment;
- a member of staff who holds a current, paediatric first aid certificate is available on the premises at all times, and accompanies children on school trips;
- a designated key worker who liaises with parents and carers;
- routine monitoring of health and safety practices, to promote children's safety and welfare;
- appropriate staffing, ratios and qualifications comply with statutory guidance and can meet the needs of all children;
- an environment where children can be seen and heard at all times;
- a member of staff responsible for leading on safeguarding within the early years; and

- training and development for all staff so they are able to take appropriate action where there are safeguarding or child protection concerns.

Safeguarding Adults at Risk

HISP recognises its legal and moral responsibility to safeguard adults at risk of abuse or neglect in their care; we take proactive steps to create safe and supportive environments for vulnerable adults.

Adults at risk include any adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect, and;
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

The Care Act (2014) identifies the following categories of adult abuse and harm:

- Physical
- Sexual
- Emotional/Psychological
- Neglect and acts of omission
- Financial or material abuse
- Discrimination
- Organisations/institutional abuse
- Domestic abuse (including coercive control)
- Modern slavery

When supporting adults at risk, the Trust will act in line with the following principles as set out in the Care Act (2014):

- Empowerment – Empowering adults at risk to make their own choices and decisions, have control over their lives, and participate actively in decisions that affect them.
- Prevention – It is better to take action before harm occurs.
- Proportionality – The least intrusive response appropriate to the risk presented.
- Protection – Support and representation for those in greatest need.
- Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- Accountability – Accountability and transparency in delivering safeguarding.

If any member of the Trust community has a concern about the safety or welfare of an adult at risk, this should be reported to a DSL or DDSL immediately. Where the subject of the concern is a pupil (e.g., in Sixth Form), or has links to a current pupil, the concern should be logged on CPOMS/my concerns. In all other cases, staff should speak to the DSL/DDSL for advice.

When responding to concerns about adults at risk, DSLs/DDSLs will be guided by the principles above and will seek advice from Adult Social Care (see Section 1.8).

The role of the DSL

The full responsibilities of the DSL and DDSLs are set out in their job description.

Please see below for a non-exhaustive list:

The DSL will:

- keep the headteacher informed of any issues;
- act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- provide oversight, support and challenge to DDSLs;
- act as a point of contact with the safeguarding partners and engaging fully with requests for information (e.g., Section 175 audit);
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- contribute to the assessment of children
- refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- have a good understanding of harmful sexual behaviour
- have a good understanding of the filtering and monitoring systems and processes in their school/area;
- where the DSL is the Prevent lead: Make sure that staff have appropriate Prevent training and induction;
- Where the DSL is a lead practitioner for the local authority: Act as a lead practitioner for the local authority;
- liaise with local authority case managers and designated officers for child protection concerns as appropriate;
- discuss the local response to sexual violence and sexual harassment with police and local authority children’s social care colleagues to prepare the school’s policies
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- be aware that children must have an ‘appropriate adult’ to support and help them in the case of a police investigation or search;
- identify if children may benefit from early help;
- refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- support their school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- refer cases to the police where a crime may have been committed;
- be available during school hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;
- undertake training to equip them with the skills to carry out the role and update this every two years;
- maintain a forensic understanding of safeguarding data, including data relating to child on child abuse;
- ensure all staff that work directly with children have read and understood Part 1 and Annex B of KCSIE (September 2024);
- ensure all staff that do not work directly with children have read either Part 1 or Annex A (as appropriate) of KCSIE (2024);
- update their knowledge and skills regularly and keep up with any developments relevant to their role;
- provide staff in their school with the knowledge, skills and support required to safeguard children;

- ensure that all staff in their school receive initial training and appropriate regular update training via whole staff training or bulletins on safeguarding, including how to recognise the signs and symptoms of abuse. This includes provision of training on how to report a safeguarding concern through the school's CPOMS/my concerns safeguarding recording system.
- ensure that all staff have an understanding of child abuse, neglect and exploitation and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs and disabilities or those who identify as LGBTQ+
- take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- take responsibility for the transfer of safeguarding files when a child leaves their school;
- monitor school mobility, and in particular take responsibility for those children removed from the school to ensure adherence is in line with LA and Trust guidance and that all reasonable steps are taken to ensure that the child is safe;
- attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- ensure that parents and carers are informed of the safeguarding procedures through access to the policy and procedures on the school website and reminders via newsletters;
- work closely with other relevant education professionals (e.g., SENCO, Virtual School Head) to ensure children with additional vulnerabilities are safeguarded;
- help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the school leadership team;
- promote a 'culture of safeguarding', in which every member of the school community acts in the best interests of the child;
- meet regularly with the safeguarding link governor and/or Chair of Governors to review safeguarding at their school;
- meet regularly with relevant curriculum leads to share information about emerging trends and ensure that the safeguarding curriculum is meeting the needs of pupils;
- meet regularly with the school Business Manager/HR to ensure that safe recruitment practices are in place and effective, including checking that the school's Single Central Record is maintained in line with statutory guidance;
- contribute to safeguarding quality assurance activities;
- liaise with the headteacher regarding safeguarding cases and iss

Strip Searches and Appropriate Adults

The following information is taken from the DfE guidance on Searching, Screening and Confiscation (2022) and the Police and Criminal Evidence Act.

Strip Searches

A strip search is a search involving the removal of more than outer clothing. Strip searches on school premises can only be carried out by police officers under the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with the Police and Criminal Evidence Act 1984 (PACE) Code C.

While the decision to undertake the strip search itself and its conduct are police matters, staff retain a duty of care to the pupils involved and should advocate for pupil wellbeing at all times. Staff are not permitted to conduct strip searches on pupils.

Before calling police into school, staff should assess and balance the risk of a potential strip search on the pupil's mental and physical wellbeing and the risk of not recovering the suspected item. Staff should consider

whether introducing the potential for a strip search through police involvement is absolutely necessary, and should always ensure that other appropriate, less invasive approaches have been exhausted. Once the police are on school premises, the decision on whether to conduct a strip search lies solely with them, and the role of the school is to advocate for the safety and wellbeing of the pupil(s) involved.

Unless there is an immediate risk of harm and where reasonably possible, staff should inform a parent of the pupil suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult. Parents should always be informed by a staff member once a strip search has taken place. Schools should keep records of strip searches that have been conducted on school premises and monitor them for any trends that emerge.

Except in cases of urgency where there is risk of serious harm to the pupil or others, whenever a strip search involves exposure of intimate body parts there must be at least two people present other than the pupil, one of which must be the appropriate adult (see below). If the pupil's parent would like to be the appropriate adult, the school should facilitate this where possible. Police officers carrying out the search must be of the same sex as the pupil being searched. An appropriate adult not of the same sex as the pupil being searched may be present if specifically requested by the pupil. Otherwise, no-one of a different sex to the pupil being searched is permitted to be present, and the search must not be carried out in a location where the pupil could be seen by anyone else.

Except in urgent cases as above, a search of a pupil may take place without an appropriate adult only if the pupil explicitly states in the presence of an appropriate adult that they do not want an appropriate adult to be present during the search, and the appropriate adult agrees. A record should be made of the pupil's decision and signed by the appropriate adult. The presence of more than two people, other than an appropriate adult, shall be permitted only in the most exceptional circumstances.

Strip searching can be highly distressing for the pupil involved, as well as for staff and other pupils affected, especially if undertaken on school premises. PACE Code C states that a strip search may take place only if it is considered necessary to remove an item related to a criminal offence, and the officer reasonably considers the pupil might have concealed such an item. Strip searches should not be routinely carried out if there is no reason to consider that such items are concealed.

Pupils will be given appropriate support, irrespective of whether the suspected item is found. If an item is found, this may be a police matter, but should always be accompanied by a safeguarding process handled by the school which gives attention to the pupil's wellbeing and involves the DSL/DDSL. Safeguarding should also be at the centre of support following a strip search in which the item is not found, both in the sense of supporting the pupil to deal with the experience of being searched, and regarding wider issues that may have informed the decision to conduct a strip search in the first place. In both cases, pupils should feel that they have an opportunity to express their views regarding the strip search and the events surrounding it. School staff should give particular consideration to any pupils who have been strip searched more than once and/or groups of pupils who are more likely to be subjected to strip searching with unusual frequency, and consider preventative approaches.

Appropriate Adults

The Police and Criminal Evidence Act (1984) 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 DSL (or DDSL) 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/my concerns. If having been informed of the vulnerabilities, the DSL or DDSL does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

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.

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

Appendix L HISP Safeguarding and Child Protection Policy – Summary of Key Information

General Principles – All staff must:

- Understand that safeguarding is everyone’s responsibility and ensure that their conduct is child centred and in line with the Professional and Safe Conduct Policy and Acceptable Use Policy.
- Be able to identify communicate effectively with the Designated Safeguarding Lead (DSL) and Deputy DSLs.
- Be alert to signs of abuse and neglect and report and record concerns in line with this policy.
- Read Part 1 and Annex B of Keeping Children Safe in Education and undertake annual safeguarding training.
- Understand the contextual safeguarding concerns identified by their school and strategies to support pupils.
- Responding to and Recording Concerns
- If a child discloses abuse, or is at imminent risk of harm, this must be reported immediately and in person to a DSL or DDSL. Staff should explain to the child what action they plan to take, including who will be informed.
- When handling disclosures, staff should remain professional, provide their full attention, and listen carefully to the child. Staff should reassure the child, and must not judge or blame, ask leading questions or promise confidentiality. Children making disclosures of abuse should not be asked to write down their disclosure.
- Any concerns for a child’s safety or welfare must be recorded on CPOMS/my concerns under the category of ‘Safeguarding Concern’ before the end of the school day. Urgent concerns, or disclosures of abuse, must be reported immediately.
- Records should be made as soon as possible after a concern arises. Staff must not destroy original notes as these may be required as evidence in court.
- Records should be made in a timely manner. They should be professional, objective, succinct, accurate and child centred. They should not include interpretations or assumptions.
- All incidents of physical intervention (use of reasonable force) must be logged on CPOMS/my concerns.
- Specific Concerns – All staff must:
- Consider whether children are at risk of abuse or exploitation in situations outside of their families (extra-familial harm), reporting and recording any concerns that arise.
- Report disclosures of Female Genital Mutilation to the DSL and to the Police. The DSL will support staff to report incidents to the police.
- Be aware of the Prevent Duty and have due regard to the need to prevent people from being drawn into terrorism. All staff should promote the fundamental British Values.
- Have a basic understanding about how filtering and monitoring is used within school to keep children safe online. Concerns relating to online safety should be logged on CPOMS/my concerns.
- Be aware that children can abuse other children (child on child abuse) inside or outside of the school and respond with the same rigour as they would for incidents involving adults.
- Adopt a zero-tolerance approach to sexual violence and sexual harassment. Staff should adopt an attitude of “it could happen here” and must never dismiss incidents as “banter”. Staff must understand the meaning of “consent” and ensure that incidents of sexual violence and sexual harassment are challenged, recorded and reported immediately.

- 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. Staff should be aware that trauma and adversity can have a lasting impact on a child's mental health, behaviour, attendance and progress at school. Concerns about a child's mental health should be recorded on CPOMS/my concerns. under the 'Safeguarding' category.

Appendix M Principles this policy is based

1. HISP recognises that:

- the safety and welfare of the child is always of paramount consideration and will work together with parents, carers and other agencies to safeguard and promote the welfare of the child;
- all children regardless of age, special needs or disability, racial or cultural heritage, religious belief, gender or sexual orientation have the right to be protected from ill treatment and neglect and to experience a good standard of care;
- all children have the right to be heard and that the wishes and feelings of the child will be central to all decision making;
- all incidents and allegations of suspicious or poor practice or abuse will be taken seriously, listened to and responded to appropriately. This includes allegations raised through the whistleblowing procedures;
- there is a consistent understanding of acceptable behaviour of children towards other children and staff within the Trust and
- safeguarding is everyone's responsibility.

2. HISP expects:

- Everyone to be alert to signs of abuse and neglect and follow procedures to ensure that children receive effective support, protection and justice.
- Everyone to know to whom they should report any concerns or suspicions;
- Everyone to be committed to creating a culture of safety that minimises the opportunity for any kind of abuse (including all forms of child-on-child) through ongoing training, education and robust response procedures.
- All schools, Learning Partnerships, and Central Team to have procedures (of which all staff and visitors are aware) for handling suspected cases of abuse of children, including procedures to be followed if a member of staff is accused of abuse, or suspected of abuse;
- A Designated Safeguarding Lead (DSL) and any Deputy Safeguarding Leads (DDSLs) to have responsibility (with oversight from the Head) for co-ordinating action within the school and liaising with other agencies. They must be the most appropriate person to advise on the response to safeguarding concerns.

3. HISP commits to work in partnership with Hampshire, Isle of Wight, Portsmouth, Southampton, and Bournemouth, Christchurch and Poole local authorities and will follow their guidance and implement their systems and protocols for referring families for early help and reporting child protection concerns.

Local authority Multi-Agency Safeguarding Hubs (MASH) or Children's Resource Centres (CRS) will ensure that each school is aware of issues within the community that are relevant to them. Alongside informing the Director of Safeguarding for the Trust, DSLs within the school will ensure that all staff and governors are aware of those issues and systems for reporting and will provide local safeguarding updates.

This policy is applicable to all on- and off-site activities undertaken by children whilst they are the responsibility of the school.

HISP are committed to anti-discriminatory practice and recognise children's diverse circumstances. Some children are at an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We ensure that all children have the same protection, regardless of any barriers they may face.

Appendix N Briefing sheet for temporary and supply staff

For supply staff and those on short contracts in HISP schools

While working in our school, you have a duty of care towards the children and young people here. This means that at all times you should act in a way that is consistent with their safety and welfare. In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL).

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

- Observing a physical injury, which you think may have been non-accidental.
- Observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for.
- Observing child behaviour that leads you to be concerned about a child or young person.
- A child or young person telling you that they have been subjected to some form of abuse
- Observing adult behaviour that leads you to be concerned about their suitability to work with children or young people.

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

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

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

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, please ensure that you have read it.

If your concern involves the DSL or a member of the senior staff, contact the LADO.

Remember, if you have a concern, report it.