



SAFEGUARDING AND CHILD PROTECTION POLICY & PROCEDURES 2024/25

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PART A - POLICY

1. POLICY STATEMENT

The Girls' Learning Trust (the Trust) is committed to safeguarding children and young people, and we expect everyone who works in our schools to share this commitment. All adults in our schools take all welfare concerns seriously and encourage children and young people to talk to us about anything that is worrying them.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who encounters children and their families has a role to play. To fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, always, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who encounters them has a role to play in identifying concerns, sharing information, and taking prompt action. Contextual safeguarding (safeguarding incidents outside the schools in the Trust) must also be considered when looking at individual cases. All assessments should include this wider picture.

Staff Awareness & Understanding

All staff must have read and understood:

- Part 1 of Keeping Children Safe in Education
- Staff Code of Conduct (which includes low-level concerns reporting, allegations against staff and whistleblowing).
- Behaviour Policy for students
- Anti Bullying Policy for students

All staff must also be aware of:

- The child protection procedures which are outlined in section 36 of this policy.
- Online Safety (including Filtering and Monitoring).
- The safeguarding response to children who go missing from education (either for those that have prolonged periods of absence or for those not on a school roll).
- The role of the designated lead (including the identity of the designated leads and any deputies).

The Welfare of the Child is Paramount

The safety and welfare of our students is of the utmost importance, ensuring that they are protected from maltreatment, impairment of their mental and physical health or development and that they are growing up in circumstances consistent with the provision of safe and effective care. We take action to enable all students to achieve the best outcomes. We have created a culture of vigilance where students' welfare is actively promoted. Students are listened to and feel safe. We maintain an 'it could happen here' attitude.

We know children learn best when they are healthy, safe, and secure, when their individual needs are met and when they have positive relationships with the people caring for them. We aim to have schools which are welcoming, safe, and stimulating and where children can enjoy learning and grow in confidence. All necessary steps are taken to keep children safe and well.

Because of the day-to-day contact with children, our staff are trained to identify when a student may be at risk of harm and abuse, and they report their concerns immediately. We have a duty to safeguard and promote the welfare of our students under the Education Act 2002 and Children Act 1989/2004 through identifying any child welfare concerns and taking action to address them in partnership with families and other agencies where appropriate.

Children are taught about safeguarding, including sensitive issues and online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. All children are taught to recognise when they are at risk and how to get help when they need it.

We are committed to ensuring that our students are taught a curriculum that aims to prepare them for life in modern Britain. Teaching the Trust's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Children are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. Relevant issues for Trust will be taught through Relationships Education, Sex Education and Health Education. Please refer to each school's policy available on the relevant website alongside statutory guidance for more information (for example see Relationships Education, Relationships and Sex Education (RSE) and Health Education, DfE, (2019)).

2. PURPOSE AND AIMS

The aims of this policy and procedure are to:

- Ensure safe recruitment practice in checking the suitability of all our staff and volunteers to work with children including the completion of risk assessments.
- Ensure staff are appropriately trained.
- Ensure all staff have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.
- Raise awareness of safeguarding/child protection issues amongst all staff, supply, agency, and volunteers and of what to do if they have concerns. This includes raising awareness of any current issues such as: Child abduction and community safety incidents; Child Criminal Exploitation (CCE); Child Sexual Exploitation (CSE); County lines; Children and the court system; Children missing from education; Children with family members in prison; Cybercrime; Domestic abuse; Homelessness; Mental health; Modern Slavery; Preventing radicalisation; The Prevent duty; Channel; Sexual violence and sexual harassment between children in school; Serious Violence; So-called 'honour'-based abuse; FGM; Forced marriage (see 'Keeping Children Safe in Education' ,DfE, September 2024)
- Ensure that volunteers are appropriately supervised.

- Ensure that our procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are robust.
- Ensure that our links with relevant agencies are effective and that we co-operate and work in a partnership regarding child protection matters, including attendance at case conferences and core group meetings.
- Ensure that the environment in each of our schools is safe and is one in which children feel secure and are encouraged to talk freely about anything that concerns them.
- Ensure that children know there are adults in the school who they can approach if they are worried about anything.
- Ensure that students have a safe space to talk to a trusted adult, where they can raise concerns.
- Ensure that the curriculum and other provision, including opportunities in the Health and Wellbeing/PSHE curriculum, develop and equip our students with the skills needed to feel safe and adopt safe practices to help them recognise risks and stay safe from abuse.
- Ensure that we support students who have been abused or may be at risk of harm in accordance with any agreed child protection plan.
- Ensure that we respond appropriately to any concern or allegation about a member of staff or volunteer.
- Ensure that staff follow accepted “safe practice” principles when working with students.
- Ensure that students are protected from all forms of harm.
- Ensure the Trust creates an environment where staff are encouraged and feel confident to self-refer concerns and to report concerns they have appropriately, for example where they or they have witnessed a situation which could be misinterpreted, may appear compromising or where behaviour may be considered as falling below the expected professional standards.

If there are Child Protection concerns, the **London Child Protection Procedures** (*London Safeguarding Children Board, 7th edition*) must be followed. The Local Safeguarding Children Partnership (LSCP) has adopted these procedures.

In addition to our overarching Safeguarding and Child Protection Policy and Procedures, the following other Trust / School policies, where relevant, should also be considered:

- | | |
|--------------------------------------|-------------------------|
| ▪ Induction | ▪ E-Safety |
| ▪ SEN | ▪ Positive handling |
| ▪ Student Premium | ▪ Intimate Care |
| ▪ Equality, Diversity, and Inclusion | ▪ Drug and Alcohol |
| ▪ Health and Safety | ▪ Medical |
| ▪ Safer Recruitment | ▪ Healthy Relationships |
| ▪ Attendance | ▪ Data Protection |
| ▪ Behaviour | ▪ Whistleblowing |
| ▪ Anti-bullying | ▪ Educational Visits |

3. LEGISLATION AND OTHER EXTERNAL GUIDANCE

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.

Although this list is not exhaustive, this policy and procedure also accords with the following other external publications (all available online via public source):

- Safeguarding Children and Safer Recruitment in Education (DFE April 2011 –Updated April 2012)
- Ofsted Education Inspection Framework (Updated July 2023)
- Prevent Duty Guidance (DfE 2023)
- Disqualification under the Child Care Act 2006 (August 2018)
- Information sharing – Advice for practitioners providing safeguarding services to children, young people, parents, and carers. (DfE updated July 23)
- What to do if you think a child is being abused (DfE March 2015)
- Section 26 of the Counter Terrorism and Security Act (2015)
- Section 5B of the Female Genital Mutilation Act (2003) Section 74 of the Serious Crime Act 2015
- Female Genital Mutilation: Resource Pack (Updated Feb 23)
- Regulated activity in Relation to Children (2012)
- Teacher Status Checks – information for employers (Updated June 2024)
- Children Missing Education: Statutory Guidance for Local Authorities (updated August 2024)
- Child Sexual Exploitation – Definition, Guide and Annexes (DfE February 2017)
- Understanding sexualised behaviour in children | NSPCC Learning
- Searching, screening and confiscation (DfE July 2022)
- The designated teacher for looked-after and previously looked-after children (DfE February 2018)
- Promoting the education of looked-after and previously looked-after children (DfE February 2018)
- Criminal Exploitation of children and vulnerable adults: County Lines guidance (Home Office, Feb 2020)
- General Data Protection Regulations (GDPR) (May 2018) and the latest Data Protection Act (2018)
- Data Protection Toolkit for Schools (Sept 2018)
- Mental Health and Behaviour in Schools (DfE November 2018)
- Young-people-who-self-harm-a-guide-for-school-staff.pdf
- Trust Governance Handbook
- Teaching online safety in schools (DfE updated Jan 23)
- Education for a Connected World (June 2020)
- Reducing the need for restraint and restrictive intervention (June 2019)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE, 2019 – Updated September 2021)
- Positive environments where children can flourish (2018 – Updated October 2021)
- Schools Covid-19 Operational Guidance (Updated February 2022)
- Safeguarding and Remote Education (Updated November 2022)
- When to call the police – Guidance for Colleges and Schools (NPCC)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (23rd December 2020) Department for Digital, Culture, Media and Sport, UK Council for Internet Safety.
- Guidance for Safer Working Practice for professionals working in education settings (Updated April 2020)
- Keeping Children safe in out of school settings: code of practice
- Meeting digital and technology standards in schools and colleges guidance GOV.UK
- Implementation of the Marriage and Civil Partnership (minimum age) Act
- Working together to improve school attendance - GOV.UK (www.gov.uk)

- School suspensions and permanent exclusions
- Improving behaviour in schools
- Gender Questioning Children - non-statutory guidance
- Mobile phones in schools - February 2024

4. DATA PROTECTION

The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

All staff must maintain records and obtain and share information (with parents, carers, other professionals working with the child, police, social services, and Ofsted as appropriate) to ensure safe and efficient management of the schools within the Trust, and to help ensure the needs of all children are met. All staff must enable a regular two-way flow of information between parents and school.

Confidential information and records about children are held securely and only accessible and available to those who have a right or professional need to see them. The Headteacher is aware of responsibilities under the latest Data Protection Act in England, including those imposed under the General Data Protection Regulation (GDPR) passed by the European Union. As a Trust we believe that protecting the data we hold about our children is a fundamental part of our safeguarding process and treat this information with as much importance as protecting the child themselves.

All staff understand the need to protect the privacy of the children in their care as well as the legal requirements that exist to ensure that information relating to the child is handled in a way to ensure confidentiality. Parents and carers are given access to all records about their child provided that no relevant exemptions (information which could cause harm to the child or any other individual) apply to their disclosure under the DPA.

The GDPR imposes more stringent requirements on entities that deal with people's personal data. This applies to all personally identifiable information held on staff, children, and parents. We are fully committed to ensuring that the Trust upholds the new rights granted to a person under the GDPR. Parents and carers should be aware that there are legal requirements that supersede data protection regulations. The Trust is required to share data with certain agencies under legal obligations.

5. CONFIDENTIALITY OF RECORDS

Our students and their parents/carers have the right to expect that all staff will deal sensitively and sympathetically with their situation. It is important that information is only available to those who need to know it. Parents/carers and where appropriate students should be told their right to confidentiality may be breached if information comes to light suggesting possible harm to a child. Safeguarding/Child Protection issues relating to individual cases must not be subject to open discussion in the staff room or elsewhere in the school.

All personally identifiable information will be kept securely, following the school's obligations under the latest data protection regulations. Members of staff should also remember not to promise to students to keep "secrets".

Please refer to the Trust's Data Protection and Freedom of Information Policy for more information.

6. DEFINITION OF SAFEGUARDING AND CHILD PROTECTION

Safeguarding is about every child.

In relation to children and young people, safeguarding and promoting their welfare is defined in Keeping Children Safe in Education (September 2024) as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

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

Please refer to Appendix A for definitions of specific safeguarding issues.

7. ROLES & RESPONSIBILITIES

Trust Board

The Trust Board has strategic leadership accountability for the school’s safeguarding arrangements and must ensure that they comply with their duties under legislation. It will ensure that policies, procedures, and training across the Trust is effective and always complies with the law.

The Trust HR & Remuneration Committee is responsible for determining Trust procedures for safer recruitment of staff and ensuring compliant maintenance of the Single Central Record.

Local Governing Bodies

In accordance with the GLT Scheme of Delegation, the Local Governing Body (LGB) is responsible for determining any local procedures for safeguarding in line with the Trust policy. Safeguarding is a standing item on all governing board meetings. The Governing Body is also responsible for reviewing safeguarding arrangements.

The LGB will appoint a Safeguarding Lead and Deputy to take leadership responsibility for their school’s safeguarding arrangements.

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

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the LGB will do all that they reasonably can to limit children’s exposure to the above risks from the school’s IT system. As part of this process, the LGB should ensure the school has appropriate filters and monitoring systems in place and regularly review

their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The LGB should consider the age range of the children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks.

The LGB should ensure that:

- the designated safeguarding lead (DSL) takes responsibility for understanding the filtering and monitoring systems and processes in place as part of their role (KCSIE 2024).
- all staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training (KCSIE 2024).
- they review the DfE's filtering and monitoring standards, discussing with IT staff and service providers what needs to be done to support the school in meeting the standards (KCSIE 2024).

Individual Staff

The Teachers' Standards 2012 state that teachers (which includes Headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff have a responsibility to provide a safe environment in which children can learn. All staff should be prepared to identify children who may benefit from early help.

All members of staff should be aware of systems within the schools which support safeguarding, and these will be explained to them as part of staff induction. This includes: the school's child protection policy; the behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying); staff code of conduct; safeguarding response to children who go missing from education; and the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

All members of staff will receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All relevant members of staff should be aware of their local early help process and understand their role in it.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead

(or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

8. ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL)

Please refer to Appendix D for details of DSLs in each school, and Annex C of Keeping Children Safe in Education for further information.

Each school has a DSL and Deputy DSL. The DSL and designated link governor meet termly.

There is also a DSL who has Trust-wide oversight and responsibility. The Trust Chief People Officer and Trust DSL meet regularly. The Trust DSL meets termly with DSLs from all Trust schools.

The DSL has a responsibility for Safeguarding and Child Protection. Key responsibilities include:

Managing Referrals

The DSL (or Deputies) will refer cases:

- Of suspected abuse, exploitation and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
- To the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme.
- Where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Where a crime may have been committed to the Police as required.
- Where a child is thought to be in immediate danger, to the police as required

Consideration will be made of the London Borough of Sutton Threshold Guidance.

Working with Others

The DSL (or Deputies) will:

- Act as a source of support, advice, and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the Headteacher to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult.
- As required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.

- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at school. This includes:
 - Ensure that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
 - From June 2021, the Virtual Headteacher has a responsibility to promote the education of children who have a social worker and regular conversations should be had to share the relevant information and to enable every opportunity for the child to reach their full potential.

Information Sharing and Managing the Child Protection File

The DSL in each of our schools is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child.

All concerns and records regarding safeguarding and child protection should be recorded on CPOMS. The guidance is clear that information may be shared where there are safeguarding concerns. Whilst consent to share is not necessarily required, there must be a legal basis to share.

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.

The file will only be accessed by those who need to see it.

Where children leave the school (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The child protection file will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead will also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college.

Raising Awareness

The DSL (or Deputies) will:

- Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff.
- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the child protection policy is available publicly and parents and carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

Training, Knowledge, and Skills

The DSL (or Deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. The designated safeguarding lead will undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures, and responsibilities of other agencies, particularly children's social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Understand the importance of the role the designated safeguarding lead has in providing information and support to children social care to safeguard and promote the welfare of children.
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- Understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations, and practitioners.
- Understand and support the school with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation.
- Can understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college.
- Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online.
- Obtain access to resources and attend any relevant or refresher training courses; and,

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing Support to Staff

Training will support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.

This includes specifically to:

- Ensure that staff are supported during the referrals processes; and
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the Views of Children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and Sharing Information

The DSL (or Deputies) will be equipped to:

- Understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations, and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- Be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.
- The most important consideration is whether sharing information is likely to safeguard and protect a child. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent Where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner.

For clarity, the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

If the DSL is not available, staff should speak to a member of the SLT/take advice from local children's social care and/or contact a member of the Education Safeguarding Team.

9. TRAINING

All staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction).

In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

When new staff join the Trust their mandatory induction training will include:

- Keeping Children Safe in Education: Part One
- The Safeguarding and Child Protection policy and procedures.
- Online safety training including filtering and monitoring
- The Behaviour Policy.
- The Staff Code of Conduct.
- The safeguarding response to children who are absent from education on repeat occasions or for prolonged periods or where the absence is persistent or unexplainable.
- The role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Safer Recruitment training will be provided to all relevant staff and governors who are involved in the recruitment process.

A record is kept of all staff safeguarding training alongside the single central record (SCR). The SCR should be checked regularly by a member of the DSL and Headteacher. Governors must also have assurance that these checks are regularly being carried out and can choose to assist in this process.

PART B – PROCEDURES

RECRUITMENT, SITE SECURITY & EXTERNAL AGENCIES

10. SAFER RECRUITMENT

The safe recruitment of staff in our schools is the first step to safeguarding and promoting the welfare of the children in education. In our recruitment and selection of staff and volunteers we will always adhere to the government guidance contained within '*Working Together to Safeguard Children*' (July 2018 – Updated July 2022) and '*Keeping Children Safe in Education*' (DfE 2024).

We will ensure that:

- For good practice, our interview panel includes at least one member who has completed safer recruitment training.
- We always follow up gaps in previous employment.
- We always require specific references from employers for the last five years.
- For all posts, paid and voluntary, the appropriate Disclosure and Barring Service (DBS) information has been received.
- In addition to obtaining the DBS certificate, anyone who is employed to teach will undergo an additional check to ensure that they are not prohibited from teaching.
- We consider carrying out online checks for shortlisted candidates and have updated our Safer Recruitment Policy to reflect this. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.

Please refer to our Safer Recruitment Policy (Appendix G) for further information.

11. CONTRACTORS AND OUTSIDE AGENCIES

We expect all contractors providing services for the Trust whose staff have access to school premises to comply with this policy and the attached procedure, as well as the Staff Code of Conduct. The contractor or individual must agree to this in writing.

We require any contractor or organisation delivering a service on behalf of the Trust or using our premises to provide evidence they adhere to the above requirements in terms of recruitment, selection, training and supervision of their staff and any volunteers, in particular DBS information. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check will be required (not including barred list information).

Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.

If a contractor working at one of our schools is self-employed, the school will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

The identity of contractors and their staff will be checked on arrival at the school.

This policy and procedure will also apply to any organisation using Trust facilities. They must agree to this in writing.

Where the governing body hires or rents out the school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe. The governing body will seek assurance that the body concerned has received relevant safeguarding training and that appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing body will also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

If a school receives allegations about staff using their premises to run activities for children, they should follow their own safeguarding policy, including contacting the LADO.

For more information on regulated activity please see 'Regulated activity in relation to children' (2012).

12. SITE SECURITY

All people on the site must adhere to the guidelines within this policy. Laxity can cause potential safeguarding issues to arise. Therefore:

- Gates should be locked at breaktimes and lunchtimes to external visitors unless opened for specific supervised events.
- All Exit Doors should be closed to prevent intrusion.
- The Trust will not request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's relatives or other visitors attending a sports day). The Headteacher will use their professional judgment about the need to escort or supervise visitors.
- For visitors who are attend in a professional capacity, their ID will be checked, and assurance will be sought that the visitor has had the appropriate DBS check (or that the visitor's employers have confirmed that their staff have appropriate checks).
- Children will only be allowed home with adults with parental responsibility or confirmed permission.
- Children should never be allowed to leave a school alone during school hours without explicit parental permission or collection by an adult, Students leaving the site must be signed out.
- Should a child leave the premises without permission then staff have been informed never to chase after a child, but rather to report immediately to the office. Then parents and police will be informed of the circumstances.
- All visitors are required to sign in at the main reception where they will be given a visitor's badge or sticker to use as ID for their visit. This will be returned to the main reception on departure.

FORMS OF ABUSE AND SPECIFIC SAFEGUARDING ISSUES

13. SPECIFIC SAFEGUARDING ISSUES

Safeguarding action may be needed to protect children and learners from specific safeguarding issues such as:

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County lines
- Children and the court system
- Children missing in education (CME)
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental Health
- Modern Slavery
- Preventing Radicalisation
- The Prevent duty
- Channel
- Sexual violence and sexual harassment between children
- Serious violence
- So-Called 'honour' based abuse
- FGM
- Forced Marriage
- Breast Ironing

Please note this is not an exhaustive list – but are an indicator of some of the key issues of which staff may become aware.

See Appendix A for further safeguarding definitions.

Local Safeguarding Priorities

The schools within the Girls' Learning Trust recruit students from across multiple boroughs including Sutton, Croydon and Merton. The safeguarding needs of our students vary greatly, staff are vigilant for warning signs and are provided with regular training opportunities across safeguarding themes, including CSE, County Lines, FGM, Online safety, Mental Health, Sexual Violence and Harassment, Sexual, Physical and Emotional Abuse and Domestic Abuse. All schools work closely with the borough services and engage in regular borough updates and briefings.

14. THE FOUR MAIN FORMS OF ABUSE

All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff should be aware of the indicators of abuse, neglect, and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

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

used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

Neglect: In *Working Together to Safeguard Children (December 2023, Page 160)*, the definition of Neglect is as follows:

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

15. RECOGNITION/SIGNS OF ABUSE

The first indication of concern about a student's welfare is not necessarily the presence of a serious injury. Many other signs, could be an indication of abuse, these may include (please note this is not an exhaustive list):

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn, or clingy, or they might have difficulty sleeping or start wetting the bed.
- Children with clothes which are ill-fitting and/or dirty.

- Children with consistently poor hygiene.
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason.
- Children who don't want to change clothes in front of others or participate in physical activities.
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry.
- Children who change friendships or have relationships with older individuals or groups.
- Children who have a significant decline in performance.
- Children who show signs of self-harm or a significant change in wellbeing.
- Children who show signs of assault or unexplained injuries.
- Children who have unexplained gifts or new possessions.
- Children who talk about being left home alone, with inappropriate carers or with strangers.
- Children who fail reach developmental milestones, such as learning to speak or walk, late, with no medical reason.
- Children who are regularly missing from school or home.
- Children who are missing from education.
- Children who are reluctant to go home after school.
- Children with poor school attendance and punctuality, or who are consistently late being picked up.
- Parents who are dismissive and non-responsive to practitioners' concerns.
- Parents who collect their children from school when drunk, or under the influence of drugs.
- Children who drink alcohol regularly from an early age.
- Children who are concerned for younger siblings without explaining why.
- Children who talk about running away.
- Children who shy away from being touched or flinch at sudden movements.

EARLY HELP, MENTAL HEALTH AND VULNERABLE CHILDREN

16. EARLY HELP

Every family can go through difficult or challenging times at some point during their lives. If you are aware of a family that is experiencing problems, they may require support to help them to deal with difficult situations and make things better. Early Help services and support should be offered as soon as a problem or difficulty starts. This is to stop things from getting worse, and to make sure that the family gets the help that they need.

The Early Help Assessment Tool (EHAT) is used to find out about the family so that we can understand the difficulties that they may be experiencing. The EHAT is used when a family would like support to help them with a difficulty; when a professional working with a family recognises that they may require extra support; when a family have lots of professionals working with them and services and information needs to be organised to help make things clearer for them, where the needs of the family are unknown or unmet. The EHAT is entirely consent based and the family can decide at any point that they no longer wish to engage with the process. An EHAT is confidential except where there is a risk of serious harm to a child or young person.

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

All staff should be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

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

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether 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 care or from home.
- Has experienced multiple suspensions, is at risk of permanent exclusion from school, AP or student referral unit.
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Has a family member in prison 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 drugs or alcohol themselves.
- Has returned home to their family from care.
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child; and
- Is persistently absent from education, including persistent absences for part of the school day.

Signposting for families in times of need is vital, especially with the impact of the cost-of-living crisis. For further support please visit the London Borough of Sutton website.

17. WORKING WITH CHILDREN

We recognise that children, who are abused, exploited, neglected, or who witness either of these things, may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, and some sense of blame. The school may be the only stable, secure, and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will support students and enable them to feel safe through:

- The content of the curriculum.
- Each school's ethos which promotes a positive, supportive, and secure environment and gives students a sense of being valued.
- Each school's behaviour policy which is aimed at supporting vulnerable students in the school - the school will ensure the student knows that some behaviour is unacceptable, but they are valued and not blamed for any abuse which has occurred.
- Liaison with other agencies that support the student such as social services, the child and adolescent mental health service, the borough school attendance service, and the educational psychology service; and

- Ensuring that, where a student with a child protection plan leaves the school, their information is transferred to any new school immediately and that the social worker is informed.

18. MENTAL HEALTH

Schools have an important role to play in supporting the mental health and wellbeing of their students. We aim to promote positive mental health and wellbeing for our whole community; students, staff, parents, and careers, and recognise how important mental health and emotional wellbeing is. We recognise that children's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement. Through a whole-school approach, we actively seek to promote emotional health and wellbeing by helping students to understand their feelings and the feelings of others.

Our role in the Trust is to help our students to succeed and reach their potential by supporting them to be resilient and mentally healthy. We also have a role to ensure that students learn about what they can do to maintain positive mental health, what affects their mental health, how they can help reduce the stigma surrounding mental health issues and where they can go if they need help and support.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behavior suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, exploitation, neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood.

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. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Schools can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If you have a concern regarding the Mental Health of a child, contact your Designated Safeguarding Lead or Head of Year immediately to enable the required support to be put in place as soon as possible.

See Appendix B for further mental health definitions.

19. CHILDREN MISSING IN EDUCATION, CME AND ELECTIVE HOME EDUCATION (EHE)

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent students and children missing education supports identifying such abuse, and in the case of

absent students, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community (KCSIE, September 2024).

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when students are not at school. This means we need to have at least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

Please note this is different to children who leave the school premises. If this happens, call the police, and follow the child where possible, do not chase.

A child on a school roll with attendance concerns, and no reason to off roll to CME, as detailed in Children Missing Education 2016. For advice, please contact attendance@cognus.org.uk, or equivalent service in other Local authorities.

A child 'Missing Education' is a child of compulsory school age who is NOT a registered student at a school and is NOT receiving suitable education otherwise than at a school (e.g., home educated or receiving paid for tuition). Children missing education are at significant risk of underachieving, being victims of harm, exploitation, or radicalisation, and becoming NEET (not in education, employment, or training) later in life' (**Children Missing Education, August 2024**). For further guidance please see the London Borough of Sutton guidance on this topic.

In response to the guidance in Keeping Children Safe in Education (September 2024) the Trust has:

- Staff who understand what to do when children do not attend regularly.
- Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones as well as an awareness of breast-ironing and honour-based abuse (including FGM and forced marriage).
- Procedures to inform the local authority when we plan to take students off-roll when they:
 - leave school to be home educated
 - move away from the school's location
 - remain medically unfit beyond compulsory school age
 - are in custody for four months or more (and will not return to school afterwards); or
 - are permanently excluded

We will ensure that students who are expected to attend the school but fail to take up the place will be referred to the local authority.

When children are added to the admissions register, each school must record the expected start date of the student. If the young person does not arrive on the start date, the appropriate school should contact the local authority at the earliest opportunity. For admissions to the school, apart from at the "start of the school's youngest year", schools are required to notify the local authority "within five days when a student's name is added to the admission register and provide all the information held within the admission register about the student".

When a student leaves the school, the admission register must also record:

- The name of the student's new school; and
- The expected start date at the new school.

Each school must inform the local authority and supply the following information:

- The full name of the student.
- The full name and address of any parent with whom the student lives.
- At least two contact telephone numbers for the child.
- If applicable, the full name and address of the parent with whom the student is going to live, and the date the student is expected to start living there.
- The name of student's destination school and the student's expected start date there, if applicable; and
- The grounds under which the student's name is to be deleted from the admission register.

If this information is not provided by the parent or carer, then a Child Missing in Education (CME) form is completed and sent to the local authority. Please see the LBS guidance on 'Children Missing Education' for more information.

Elective Home Education

When a parent/carer expresses their intention to remove a child from their current school with a view to educating at home, we will make it clear that this is not a decision we would ever recommend. We will liaise with other professionals to coordinate further discussion with parents/carers where possible. This will be particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where the decision to home educate raises safeguarding concerns the DSL (or deputies) will seek further advice from Children's Social Care. Please see the LBS guidance on 'Elective Home Education' for more information.

20. ATTENDANCE

Please see relevant school websites for attendance and punctuality policies. This should be read in conjunction with the LBS guidance on 'School Attendance'.

21. CHILDREN LOOKED AFTER (CLA)

The designated lead staff and governors are also responsible for Children Looked After (CLA). All CLA students have a Personal Education Plan (PEP), which is part of the child's care plan. This is reviewed termly. Advice and support are available through the virtual school and virtual Headteacher. Please see the LBS guidance on 'Virtual School Guidance' for more details.

22. PREVIOUSLY CHILDREN LOOKED AFTER (POST-CLA)

The designated lead staff and governors are also responsible for Previously Children Looked-After. A Post-CLA student is one who is no longer looked after in England and Wales because s/he is the subject of an adoption, special guardianship or child arrangements order which includes arrangements relating to with whom the child is to live, or when the child is to live with any person, or has been adopted from 'state care' outside England and Wales; and a child is in 'state care' outside England and Wales if s/he is in the care of or accommodated by a public authority, a religious organisation or any other organisation the sole or main purpose of which is to benefit society.

Post-CLA support arrangements are distinct to those for CLA, and are responsive to the needs of the child and family using the appropriate school support systems which will include PPG but not the PEP process.

We aim to help raise Post-CLA parents' and guardians' awareness of the PP+ and other support – this includes encouraging parents of eligible children to tell the school if their child is eligible to attract PP+ funding; and play a key part in decisions on how the PP+ is used to support them.

As a Trust we recognise that not all Post-CLA are underachieving, while some may be underachieving and not eligible for funding. We plan to use our funding creatively to support any individual in which any area of under-performance is evident.

For further information on use of Student Premium funding please visit the relevant school's website.

23. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS OR DISABILITIES (SEND) OR CERTAIN HEALTH CONDITIONS

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, exploitation and neglect in this group of children. These can include:

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

In our Trust we identify students who might need more support to be kept safe or to keep themselves safe. We do this in the following ways:

- Children will have a familiar adult to support with communication through simple language.
- Extra pastoral support is considered for children with SEN and disabilities.
- Use of visual aids and sign language to support understanding where required.
- Use of a familiar Speech and Language therapist to ensure that questioning and answers are put in a manner accessible to the child.
- Children are carefully monitored and observed to provide a full picture of their behaviour and mannerism so that any changes are noted, and a comparison can be made.
- The use of body maps, visuals and sign language are used to allow children to communicate their needs or concerns.
- The use of social stories is regularly used to support appropriate and inappropriate behaviour – such as bullying and keeping safe.
- Intervention groups teach children how to communicate and explain appropriate and inappropriate behaviour.

When required to use reasonable force to calm a situation, 'reasonable' means 'using no more force than is needed'. Individual plans for vulnerable children will be drawn up to reduce the use of force.

ONLINE AND DIGITAL SAFETY

24. INTERNET FILTERING AND MONITORING

Web Filtering - NetSweeper

This is the name of the current solution deployed across all Trust schools. NetSweeper is used to filter billions of categorised URLs, text and images to ensure education-specific safe searches in over 40 languages. For any sites that are not in their database, they use AI to analyse and categorise in real time. It is compliant with:

- PREVENT
- Home Office terrorism block list
- Internet Watch Foundation (IWF) block list and Image Hash List
- KCSIE
- UK Safer Internet Centre
- Meeting digital and technology standards in schools and colleges

We use NetSweeper to help protect our students and staff from:

- Online bullying
- Child sexual exploitation
- Self-harm content
- Radicalisation
- Drug abuse
- Fake news

In general, filtering is split into three groups which impact staff and students. Each group is configured with internet access policies depending on the required access to various internet site categories:

- Staff
- Students (Years 7-11)
- Students (Years 12-13)

Splitting the filtering in this way allows us to better manage and fine-tune access as staff require less restricted access than students. Similarly, Sixth-Form students require access to some internet resources that lower-year groups do not.

Monitoring - Smoothwall Monitor (Formerly Visigo)

This is an additional layer of monitoring GLT has implemented to help us keep our staff and students safe while using our IT systems. It provides real-time monitoring of all GLT student access PCs and laptops. Digital monitoring in this way has helped us spot students at serious risk online. Students who may otherwise have gone unnoticed. The software offers:

- Proactive real-time monitoring which captures user activity as it happens, automatically sending potential risks through to the Monitor portal, which the DSL teams have access to.
- Online and offline monitoring which captures activity that may indicate a risk, even outside of the regular web browser such as in a Word document, messaging app, or encrypted “dark web” browsers.
- Smoothwall have a 24/7 in-house team of moderators who review captures to minimise false positives and contact us by phone for any urgent risks.
- Alerts are sent in real-time by phone, email, and stored within the intuitive portal for the DSL teams to review.

While NetSweeper and Smoothwall Monitor work together to provide a robust and manageable filtering and monitoring solution, these systems do have their limitations and will not provide filtering or monitoring on personal devices outside of the GLT networks.

Location	Device	Filtering (NetSweeper)	Monitoring (Smoothwall)
In school	School Device	Yes*	Yes
	Personal Device (Using school Wi-Fi not mobile data)	Yes	No
At home	School Device	No	Yes
	Personal Device	No	No
	Personal Device (Remoting in)	Yes	Yes

*Student and staff accounts are set up with different levels of filtering.

Web filtering & monitoring reports

NetSweeper can be configured to provide many different reports which can be run manually as needed or scheduled to provide the DSL teams with regular updates. As of September 2023, a daily report, which will show websites that students have attempted to access but have been blocked by our filtering policies, will be sent directly from NetSweeper to the DSLs. This report will be sent at the end of the school day at 4pm.

An annual review of all manually unblocked sites will be carried out. A report will be scheduled to list all manually unblocked websites which the school has agreed to allow through the filtering which would otherwise be blocked by NetSweeper. This report will then be reviewed by the DSL team to determine if the sites are still appropriate or if they should be added back to the blocked list.

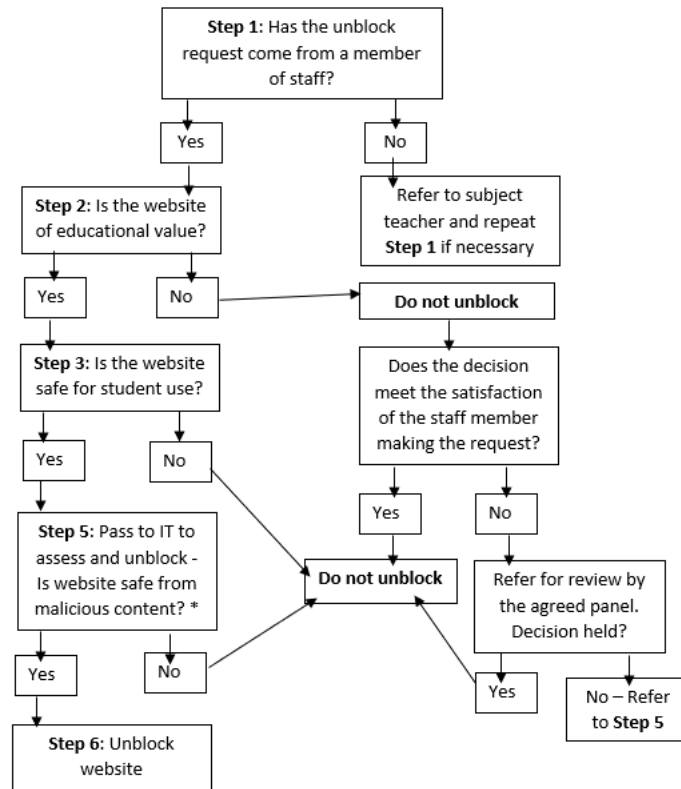
Smoothwall Monitor sends real-time reports to the DSL teams for critical alerts, it also records and logs less critical alerts in the portal for the DLS teams to review. These should be reviewed daily.

Unblocked websites and management.

It is important that we do not unblock websites unnecessarily; only sites that are of educational value and have been assessed by the DLS team for any potential safeguarding issues be allowed to bypass the NetSweeper filtering for students.

The DSL team is responsible for using their professional judgment when agreeing to unblock a website for student use. If a member of staff requires a website to be unblocked, the request should be passed to the DSL to assess the safeguarding risk. After careful consideration, the DSL will instruct the IT team to unblock, if necessary. Staff in school should be aware that a website request will take time to assess and should not expect an immediate resolution.

Should the DSL team decide that a website will not be unblocked, and this decision is disputed by the requesting member of staff, the decision should be reviewed by the CEO, COO and Head of IT. The panel will assess the educational value of the website, the safeguarding reasons for the site to be initially flagged as blocked by NetSweeper and any technical vulnerabilities the site may introduce.



*Malicious Content means viruses, worms, time bombs, Trojan horses and other harmful or malicious code, files, scripts, agents, or programs.

Annual review.

On an annual basis, on 1 June, an automated report from NetSweeper will be issued to the DSLs which will list all websites that have been manually unblocked using the above process. This list is to be reviewed and a decision made as to whether the unblocked sites are still necessary. If any sites are to be added back to the student filtering policy, using the decision process above, inform IT to remove the website from the unblocked list.

All staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring at induction. The training is regularly updated. In addition, all staff receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

We fully adhere to the government guidance 'Meeting digital and technology standards in schools and colleges'.

25. ONLINE SAFETY

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist

messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse. Online Safety Policies for each School can be found on the relevant school website.

Students are specifically taught about safe use of the internet. Our policy is not to block everything and only allow children access to certain sites – they need to be taught what is acceptable and what is unacceptable, and what to do when they feel ‘uncomfortable’.

When Students use the network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, some students can access the internet on their own devices using their own data plan. To minimise inappropriate use, students are supervised and guided carefully when engaged in learning activities involving online technology. Online safety education is embedded within the curriculum and students are taught how to use online technology safely and responsibly.

As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online.

Through training all staff members will be made aware of the following:

- Student attitudes and behaviours which may indicate that they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a student’s online activity.

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material, including when they are online at home. Appropriate filters and appropriate monitoring systems should be in place. Where children are being asked to learn online at home, the Department for Education has provided advice to support schools and colleges to do so safely.

26. MOBILE PHONE AND CAMERA SAFETY

Acceptable use of mobile devices is different in each of our schools, please refer to school’s behaviour and online safety policies for further information. All staff are aware that they should not be using personal devices in the vicinity of students.

For more information please see: *‘Information sharing – Advice for practitioners providing safeguarding services to children, young people, parents, and carers’* (DfE updated July 23)

WHISTLEBLOWING AND ALLEGATIONS MANAGEMENT

27. ALLEGATIONS INVOLVING STAFF (INCLUDING SUPPLY / AGENCY / VOLUNTEERS / CONTRACTORS)

Allegations or concerns that a member of staff, worker, volunteer or contractor that might indicate a person would pose a risk of harm if they continue to work in their present position or in any capacity with children in a school must immediately be notified to the appropriate Headteacher of the school concerned (or the CEO if the concern is about the Headteacher). This guidance should be followed where it is alleged that anyone working within the Trust 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.

The Headteacher (or CEO) will always consult the Designated Officers (in Sutton, this person is still known as the Local Authority Designated Officer or LADO) within one working day. The LADO will conduct advise on investigations and may convene an Allegations Against Staff/Volunteers Meeting (ASV) and involve other agencies as appropriate.

Following consultation, the Headteacher (or CEO) will decide on appropriate action, which may include consideration of disciplinary proceedings.

It is important to bear in mind that although the concern may relate to an individual student, other students may also be at risk.

The Trust will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the Trust (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. This should encourage an open and transparent culture; enable each school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of all our schools.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or because of vetting checks undertaken.

The Headteacher must decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO)

Keeping Children Safe during Community activities, after school clubs and Tuition Oct 2020

This is non-statutory guidance from the Department for Education (DfE). It aims to help providers of out-of-school settings (OOSS) understand best practice for creating a safe environment for children in their care and give parents and carers confidence that their child is in a safe activity or learning environment.

For more information please see *'Keeping Children Safe Code of Practice'*.

It is an allegation if the person* 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 (also includes behaviour outside the school).

(*Person could be anyone working in the Trust that provides education for children under 18 years of age, including supply teachers, volunteers, and contractors.)

Allegations should be reported to the LADO without delay. Before contacting the LADO, Headteachers should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or the Trust, or a combination of these.

Low-level Concerns

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

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and
- Does not mean the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone, contrary to school policy.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating children.

Staff should report concerns either as a self-referral or a concern regarding a colleague to the Headteacher in the relevant school. This can be done in person or via the established process set out by the school. Staff should feel encouraged and confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

If the Headteacher in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO. It is recommended calling the LADO to talk your concern through for support and assurance purposes in all cases.

If the concern has been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:

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

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Low-level concerns should be recorded in writing, including:

- Name* of individual sharing their concerns.
- Details of the concern.
- Context in which the concern arose.
- Action taken.

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely, and comply with the Data Protection Act 2018 by the Headteacher. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised, or extra training delivered to minimise the risk of it happening again.

The procedures in 'Keeping Children Safe in Education' (DfE, September 2024), 'Working Together to Safeguard Children' (HM Government, December 23) and the Sutton Local Safeguarding Children Partnership procedures will be followed in all such cases.

When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the DBS for consideration of the case

If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed. More information on this is available on the London Borough of Sutton website.

28. ALLEGATIONS AGAINST OTHER CHILDREN

If an allegation of abuse is made against other children by children, then this must be reported immediately, in accordance with this policy.

This will then be reported to the Children's First Contact Service (CFCS) if threshold is met or if the Child is not a Sutton resident the relevant Local Authority equivalent service, by a designated person or deputy designated person.

Abuse or concerns about a risk of abuse or harm by other children/young people is subject to the same safeguarding procedures as in respect of children or young people being abused by an adult.

Professionals responding should be alert to the risk a child/young person may pose to children/young people other than any 'current' victim; and

Children or young people who harm others are likely to have considerable needs themselves (e.g., they may have been subjected to abuse, witnessed domestic violence, or committed criminal offences).

29. WHISTLEBLOWING

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team. Where there are concerns about the way that safeguarding is carried out within our schools, staff should refer to the Whistle-blowing Policy, on the GLT Staff Zone.

A whistleblowing disclosure must be about something that affects the public such as:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A legal obligation has been breached.
- There has been a miscarriage of justice.
- The health or safety of any individual has been endangered.
- The environment has been damaged.
- Information about any of the above has been concealed.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

The NSPCC whistleblowing helpline is available as an alternative route for staff that do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school.

SPECIFIC SITUATIONS AND PROVISIONS

30. FOREIGN EXCHANGE VISITS (IF APPLICABLE)

We will seek the consent of our host families to carry out checks with the appropriate Local Authority to ensure suitability.

If a host family has been subject of concern, unless there is satisfactory resolution, the family will be regarded as unsuitable to receive or continue to host a student from overseas. We will take responsible steps to ensure that a comparable approach is taken with our or by our comparison schools abroad.

Annex D of Keeping Children Safe in Education explains in full the requirements for schools to follow their statutory duties regarding hosting and exchange visits.

31. HOSTING EXCHANGE VISITS

When the school is arranging for a visiting child/young person to be provided with care and accommodation in the UK in a home of a family to which the child/young person is not related, the responsible adults are in regulated activity for the period of the stay.

In such cases the school is the regulated activity provider; therefore, the school will obtain the necessary information required including a DBS with barred list information to inform its assessment of the suitability of responsible adults.

32. HOME-STAYS' IN UK

If the school arranges the homestay, they should obtain an enhanced DBS for everyone in the home over 18 years old.

33. ALTERNATIVE PROVISION

The school will remain responsible for a student's welfare during their time at an alternative provider.

When placing a student with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

34. WORK EXPERIENCE

When a student is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.

35. ROLE OF THE RESPONSIBLE ADULT (POLICE AND CRIMINAL EVIDENCE ACT (1984) – CODE C)

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

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

The DSL or Deputy should challenge any action such as searches that they feel are not appropriate.

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

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

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

A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence², or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e., failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

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

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

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

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

- 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.
- A social worker of a local authority
- Failing these, some other responsible adult aged 18 or over who is not:
 - A police officer;
 - Employed by the police;
 - Under the direction or control of the chief officer of a police force; or
- A person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

Further information can be found in the Statutory guidance to this Code.

CHILD PROTECTION PROCEDURES

When a child discloses, or you are aware there is a safeguarding issue do not delay in taking action:

- Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this – do not leave notes in the Designated Safeguarding Lead's pigeonhole or rely on email as they may not get back to check their post until the end of the day once the student has gone home.
- Early referral gives more time to offer help to the student and family before the situation becomes more serious.
- When the matter is already severe or serious, early referral gives more time for others to protect the student.
- The Designated Safeguarding Lead may consult the Children's First Contact Service (CFCS) or other relevant Local authority.
- You will also be asked to document the disclosure on CPOMS.
- Make written notes.

In Summary

1. Receive – listen to what the student wants to tell you.
2. Reassure – that they are believed, and their concern will be followed up.
3. React – ask open questions and then speak to the DSL.
4. Record – make a written record of the conversation and pass it to the DSL.
5. Refer – via the DSL and using the local referral process.

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

Referral Process

Any member of staff can make a referral to the Children's First Contact Service (CFCS) or other relevant Local Authority Service Hub or the Police, but they should always consult the Designated Safeguarding Lead wherever possible.

The designated staff may contact the Children's First Contact Service (CFCS) or other relevant Local Authority Service Hub to make a referral or take advice or contact the child's social worker (if allocated.)

If staff are concerned that the child or family involved have been exposed to or are susceptible to radicalisation or extremist behaviour, then when making a referral, they will request a referral to the national PREVENT strategy (Counterterrorism and Security Act 2015).

Additional information is also available in the London Child Protection Procedures

Remember

1. If in doubt, consult.
2. Do not ignore concerns, even if these are vague.
3. The first responsibility of staff is to the student.
4. If you need help or support to manage your own feelings, this can usually be provided.

Contact with the Family

Contact with the family should always be discussed with the Designated Safeguarding Lead, who may consult the Children's First Contact Service (CFCS) or other relevant Local Authority Service Hub or the Education Safeguarding Team.

In cases where a minor physical injury causes concern, then the policy for dealing with accidents should be followed. If the explanation suggests a non-accidental cause for the injury (or a failure to protect the student from harm), advice must be taken immediately from the Children's First Contact Service (CFCS) or other relevant Local Authority Service Hub.

In cases of possible neglect or emotional abuse, the concern may have built up over a period of time. There may have been discussion previously between staff and the family about sources of help, but if concerns persist, the Designated Safeguarding Lead will need to refer to the Children's First Contact Service or other relevant Local Authority Service Hub and will normally advise the family of this unless specifically told otherwise.

In cases where there are suspicions of sexual abuse or physical chastisement, the Designated Safeguarding Lead will seek immediate advice from the Children's First Contact Service or other relevant Local Authority Service Hub before discussing this with the family.

Recording

- Where there are concerns about a student, our electronic files have an appropriate flag to indicate concern.
- All records relating to child welfare concerns will be kept on the student's child protection file and the file will be kept secure - a chronology of concern will be kept by the designated teacher.
- Written records of any concerns about students are kept, even where there is no need to refer the matter immediately.

- Information from records will only be accessed on a "need to know" basis; access is strictly controlled by the designated teacher.
- Key staff will need to know when a student is subject to a Child Protection Plan, so they can monitor the Student's welfare.
- Records relating to the student's welfare will remain on the student's file as long as the student is a student at the school.
- When the student leaves the school, the new school will be informed that the school's records contain information about child protection concerns even where these are no longer current. Records should be sent to the new school in a way that is lawful in terms of data protection requirements.
- Records will be kept until the child is 18 years old by primary schools and 25 years old for secondary schools.

Working with other agencies

- All staff have a legal duty to assist local authority Children 's Social Care or the Police when they are making enquiries about the welfare of students.
- Information about a student must therefore be shared on a "need to know" basis with other agencies.
- When telephone requests for information are received, always maintain security by checking the telephone number listing for the caller and calling back to a switchboard number before giving information or confirming the student is on roll.
- Always advise the designated teacher about such requests for information.
- Requests for attendance at meetings about individual students (e.g., child protection conferences) should be notified to the designated teacher, who will arrange preparation of a report and attendance at the meeting.
- Reports should contain information about the child's:
 - academic progress
 - attendance
 - behaviour
 - relationships with children and adults
 - family
 - any other relevant matter.
- Reports should be objective, distinguishing between fact, observation, allegation, and opinion.
- Unless you specify otherwise, reports will normally be made available to the student's family.

Students Subject to a Child Protection Plan

- The DSL will be told by the relevant local authority when a student is subject to a Child Protection Plan.
- The name of the key social worker must be clearly recorded on the student's record.
- Our schools will participate fully in the work of Core Groups for these student, to assist with the objectives of the Child Protection Plan for the student.
- When a student is subject to a Child Protection Plan, the school will report all unexplained absences even if only of a day.
- When a student is subject to a Child Protection Plan, the school will report all behavioural changes or other concerns to the key social worker; and
- When a student who is subject to a Child Protection Plan leaves the school, all the child protection information will be transferred to any new school.

Child's Need for a Social Worker

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

All staff must always observe the above policy and procedure. They will be reviewed annually and as required in line with changes in local (LSCP) or national guidance.

APPENDICES

APPENDIX A: DEFINITIONS OF SPECIFIC SAFEGUARDING ISSUES

Bullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the four main types of bullying are: physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling), social (e.g. isolating an individual from the activities, lying and spreading rumours, damaging someone's reputation and carrying out acts behind a person's back to cause humiliation) and cyber (e.g. sending abusive or hurtful texts, emails, posts, images or videos, deliberately excluding others online, spreading gossip or rumours and imitating others online or using their log-in details).

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

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

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

Children who are lesbian, gay, bisexual, or gender questioning

IMPORTANT NOTE This section is under review by the government and may change in due course.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

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

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider

vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

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

Child Sexual Exploitation (CSE) and Criminal Exploitation (CCE)

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

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts, or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

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

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- Appear with unexplained gifts, money or new possessions;
- Associate with other children involved in exploitation;
- Suffer from changes in emotional well-being;
- Misuse alcohol and other drugs;
- Go missing for periods of time or regularly come home late; and
- Regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- Have older boyfriends or girlfriends; and
- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, student referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing and are subsequently found in areas away from their home;
- Have been the victim or perpetrator of serious violence (e.g. knife crime);
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- Are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- Owe a 'debt bond' to their exploiters;
- Have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office and The Children's Society County Lines Toolkit For Professionals](#)

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13

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

So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children’s social care.

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

Radicalisation and Extremism

Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism [147] is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation [148] refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism [149] is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

[147] As defined in the Government’s Counter Extremism Strategy www.gov.uk/government/publications/counter-extremism-strategy.

[148] As defined in the Government’s Prevent Duty Guidance for England and Wales. www.gov.uk/government/publications/prevent-duty-guidance/revise-prevent-duty-guidance-for-england-and-wales

[149] As defined in the Terrorism Act 2000 (TACT 2000) www.legislation.gov.uk/ukpga/2000/11/contents

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are [possible indicators](#) that should be taken into consideration alongside other factors

and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard [150] to the need to prevent people from being drawn into terrorism". [151] This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially [paragraphs 57-76](#), which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads (and deputies) and other senior leaders in colleges should familiarise themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

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

[150] According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions. [151] "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

All staff will undertake Prevent awareness training

Child-on-Child Abuse

Staff should be aware that safeguarding issues can manifest themselves via Child-on-Child Abuse/harm. This is most likely to include, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery).
- up skirting, 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; and
- 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).

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Child-on-Child Abuse/harm can be a one-off serious incident or an accumulation of incidents. It can involve physical, emotional, or sexual abuse. Child-on-Child Abuse/harm involves someone who abuses a ‘vulnerability’ or power imbalance to harm another and have the opportunity or be in an environment where this is possible. While perpetrators of Child-on-Child Abuse/harm pose a risk to others, they are often victims of abuse themselves.

We recognise that even if there are no reported cases of Child-on-Child Abuse, such abuse may still be taking place and is simply not being reported. We recognise that it is more likely that girls will be victims and boys perpetrators, but that all Child-on-Child Abuse is unacceptable and will be taken seriously.

KCSIE 2024, Part 5 sets out how schools and colleges should respond to reports of sexual violence and sexual harassment).

There are procedures in place to minimise the risk of Child-on-Child Abuse. There are systems in place for children to confidently report abuse, knowing their concerns will be treated seriously. These systems should be promoted to the students regularly. It is clear in each school how allegations of Child-on-Child Abuse will be recorded, investigated, and dealt with. The process identifies how victims, perpetrators and any other children affected by Child-on-Child Abuse, will be supported.

Up skirting

Voyeurism (Offences) Act 2019: The Voyeurism (Offences) Act, which is commonly known as the Up-skirting Act, came into force on 12th April 2019. Up skirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Private Fostering

The phrase ‘private fostering’ is often misunderstood. There is local authority fostering and fostering by private agencies. However, in law ‘Private Fostering’ is quite different. From a safeguarding perspective, many private fostering arrangements are ‘hidden’ and, it appears, are rarely brought to the attention of local authorities, even though it is an offence not to inform them. The penalty for non-reporting is a maximum £5,000 fine, but it seems that convictions are extremely rare.

What is Private Fostering?

A private fostering arrangement is one that is made privately (without the involvement of a local authority (or a private sector agency)) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins). The local authority should be notified of the arrangement at least six weeks before it starts and not to do so is a criminal offence.

Once the local authority has been notified, children's services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carers household. Children's services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

Overseas Students

If an overseas student under the age of 16 (or under 18 if disabled) stays with a host for 28 days or more, there is a legal requirement for the host, guardianship agency, language school, agent, or other person or company involved in placing the student, to inform their local authority.

Breast Ironing

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape, kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

Disguised Compliance

Parents who appear to cooperate to avoid professionals getting too close or asking too many questions. There is a tendency by professionals to confuse participation with cooperation. Indicators include parents that put little effort into making changes, limited improvement despite significant input, conflicting views of child and parent, parents align with certain professionals and only engage with part of the plan. The risks of disguised compliance are that cases may drift and lack focus, significant issues may be missed, risks may increase, cases may be closed too early, and the child remains at risk of harm. It is important to keep an open mind, use an investigative approach and effective questioning. As professionals we must look beyond the obvious.

Hidden Children

Children who do not attend school can become hidden, which means that we are less able to help and protect them. Some of these children may experience risks within their family, such as abuse and neglect. There may also be risks outside their family, such as radicalisation or exploitation. Protecting children from these external risks is known as contextual safeguarding. Children who do not attend school may be at further risk of not achieving their educational potential. They may not be able to access formal education or employment in the future if they have not gained recognised qualifications. They will also not benefit from the role that schools play in developing children's skills to participate fully and constructively in society.

So which children are we talking about?

- Children not attending school nor on a school roll, including children who have been excluded both on a permanent or an informal basis and for whom no suitable alternative provision is arranged.
- Children who fall under the heading 'educated at home', but may not be receiving effective, efficient, and suitable education or any education. This includes some children who may not be known to their local authority (LA) or any agencies.
- Children attending unregistered schools, sometimes under the guise of being electively home educated.
- Children in alternative provision that is of insufficient quality or is not provided for the required hours.
- Children without a school place in LAs in which the protocols are not working well enough for hard-to-place children.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. This may have an impact on them in a number of different ways and they may need emotional support. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures.

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of

relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support

National Domestic Abuse Helpline:

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Operation Encompass:

In May 2024, the Victims and Prisoner’s Act received Royal Assent. This places a statutory duty on all police forces in England and Wales to participate in Operation Encompass.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or a deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children’s social care if they are concerned about a child’s welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

Operation Encompass is currently under review in Sutton.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

Transform Sutton - 020 8092 7569 / transformsutton@cranstoun.org.uk

[Not Alone in Sutton](#)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation.

Fabricated or Induced Illness

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

Adverse Childhood Experiences (ACEs)

1 in 3 diagnosed mental health conditions in adulthood are directly related to adverse childhood experiences. ACEs can include maltreatment, violence and coercion, adjustment, prejudice, family adversity, inhumane treatment, adult responsibilities and bereavement and survivorship. If you have witnessed or experienced any of the following before the age of 18 you have suffered an adverse childhood experience: domestic violence, sexual abuse, alcohol abuse, physical abuse, parental separation, drug abuse, verbal abuse, mental ill-health, or imprisonment.

Protective factors:

- Positive and supportive family
- Safe relationships with peers
- Access to a supportive community
- Ability to regulate emotions
- Acquisition of problem-solving skills
- Compassionate, professional response
- Early intervention from services
- Trauma-informed systems

When talking to someone who has suffered an ACE, don't ask, what is wrong with you? But, what has happened to you?

Trauma and Attachment

A significant number of children are exposed to traumatic life events. A traumatic event is one that threatens injury, death, or the physical integrity of self or others and also causes fear, terror, or helplessness at the time it occurs. Traumatic events include sexual abuse, physical abuse, domestic violence, community and school violence, medical trauma, car accidents, acts of terrorism, war experiences, natural and human-made disasters, suicides, and other traumatic losses.

If a child has experienced trauma, they are likely to develop other related behaviours. These include:

- the development of new fears
- separation anxiety (particularly in young children)
- sleep disturbance, nightmares
- sadness
- loss of interest in normal activities
- reduced concentration
- decline in academic engagement
- anger
- somatic complaints
- Irritability

Contextual Safeguarding

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods in schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore, children's social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical

part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

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

Serious Violent Crime

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

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

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

Professionals should also be aware that violence can often peak in the hours just before or just after school, when students are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. The [Youth Endowment Fund \(YEF\) Toolkit](#) sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

The Police, Crime, Sentencing and Courts Act will introduce early in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to

prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

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

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Modern Slavery

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

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

Cyber Crime

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

Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and
- Making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at 'Cyber Choices, 'NPCC- When to call the Police' and via the National Cyber Security Centre.

APPENDIX B: MENTAL HEALTH DEFINITIONS

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their students. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems (KCSIE, 2024).

Anxiety

Anxiety problems can significantly affect a child's ability to develop, to learn or to maintain and sustain friendships. Children and young people may feel anxious for several reasons – for example because of worries about things that are happening at home or at school, or because of a traumatic event. Symptoms of anxiety include feeling fearful or panicky, breathless, tense, fidgety, sick, irritable, tearful, or having difficulty sleeping. If they become persistent or exaggerated, then specialist help, and support will be required.

Clinical professionals refer to several diagnostic categories:

- Generalised anxiety disorder (GAD) – a long-term condition which causes people to feel anxious about a wide range of situations and issues, rather than one specific event.
- Panic disorder – a condition in which people have recurring and regular panic attacks, often for no obvious reason.
- Obsessive-Compulsive Disorder (OCD) – a mental health condition where a person has obsessive thoughts (unwanted, unpleasant thoughts, images or urges that repeatedly enter their mind, causing them anxiety) and compulsions (repetitive behaviour or mental acts that they feel they must carry out to try to prevent an obsession coming true).
- Specific phobias – the excessive fear of an object or a situation, to the extent that it causes an anxious response, such as panic attack.
- Separation Anxiety Disorder (SAD) – worry about being away from home or about being far away from parents/carers, at a level that is much more than normal for the child's age.
- Social Phobia – intense fear of social or performance situations.
- Agoraphobia – a fear of being in situations where escape might be difficult, or help wouldn't be available if things go wrong.

Depression

Feeling low or sad is a common feeling for children and adults, and a normal reaction to experiences that are stressful or upsetting. When these feelings dominate and interfere with a person's life, it can become an illness. Depression can significantly affect a child's ability to develop, to learn or to maintain and sustain friendships.

Clinicians making a diagnosis of depression will generally use the categories major depressive disorder (MDD – where the person will show a number of depressive symptoms to the extent that they impair work, social or personal functioning) or dysthymic disorder (DD – less severe than MDD but characterised by a daily depressed mood for at least two years).

Hyperkinetic Disorders (e.g., disturbance of activity and attention)

Although many children are inattentive, easily distracted, or impulsive, in some children these behaviours are exaggerated and persistent, compared with other children of a similar age and stage of development. When these behaviours interfere with a child's family and social functioning and with progress at school, they become a matter for professional concern.

Attention Deficit Hyperactivity Disorder (ADHD) is a diagnosis used by clinicians. It involves three characteristic types of behaviour – inattention, hyperactivity, and impulsivity. Whereas some children show signs of all three types of behaviour (this is called 'combined type' ADHD), other children diagnosed show signs only of inattention or hyperactivity/impulsiveness.

Hyperkinetic disorder is another diagnosis used by clinicians. It is a more restrictive diagnosis but is broadly like severe combined type ADHD, in that signs of inattention, hyperactivity and impulsiveness must all be present. These core symptoms must also have been present before the age of seven and must be evident in two or more settings.

Attachment Disorders

Attachment is the affectionate bond children have with special people in their lives that lead them to feel pleasure when they interact with them and be comforted by their nearness during times of stress. Researchers generally agree that there are four main factors that influence attachment security: opportunity to establish a close relationship with a primary caregiver; the quality of caregiving; the child's characteristics; and the family context. Secure attachment is an important protective factor for mental health later in childhood, while attachment insecurity is widely recognised as a risk factor for the development of behaviour problems.

Eating Disorders

The most common eating disorders are anorexia nervosa and bulimia nervosa. Eating disorders can emerge when worries about weight begin to dominate a person's life. Someone with anorexia nervosa worries persistently about being fat and eats very little. They lose a lot of weight and if female, their periods may stop. Someone with bulimia nervosa also worries persistently about weight. They alternate between eating very little, and then bingeing. They vomit or take laxatives to control their weight. Both eating disorders affect girls and boys but are more common in girls.

Deliberate Self-harm

Self-harm is a serious public health problem and is the reason behind many admissions to accident and emergency departments every year. Self-harm and suicidal threats by a child/young person put them at risk of significant harm and should always be taken seriously and responded to without delay.

Common examples of deliberate self-harm include 'overdosing' (self-poisoning), hitting, cutting, or burning oneself, pulling hair or picking skin, or self-strangulation. The clinical definition includes attempted suicide, though some argue that self-harm only includes actions which are not intended to be fatal. It can be a coping mechanism, a way of inflicting punishment on oneself and a way of validating the self or influencing others.

Self-harming is NOT attention seeking behaviour, it is attention NEEDING behaviour. The schools in the Trust will follow the Sutton Self-Harm protocol in responding to concerns about self-harm.

Post-traumatic stress

If a child experiences or witnesses something deeply shocking or disturbing, they may have a traumatic stress reaction. This is a normal way of dealing with shocking events and it may affect the way the child thinks, feels and behaves. If these symptoms and behaviours persist, and the child is unable to come to terms with what has happened, then clinicians may make a diagnosis of post-traumatic stress disorder (PTSD).

APPENDIX C: SEXUAL VIOLENCE AND SEXUAL HARASSMENT

The schools within the Trust will follow the guidance in 'Keeping Children Safe in Education' (DfE, September 2024): Responding to reports of sexual violence and sexual harassment:

- All staff should be aware that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

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

APPENDIX D: DESIGNATED STAFF INFORMATION

	CHSG	NHSG	WHSG
DSL	<p>Miss Helen Holmes hholmes@carshaltongirls.org.uk</p> <p>0208 6478294 07391909736</p>	<p>Mrs. Chantal Hart Hart-C@nonsuchschool.org</p> <p>0208 394 3400 07872 501777</p>	<p>Mrs Melissa Sundborg msundborg@wallingtongirls.org.uk</p> <p>0208 647 2380 07376047112</p>
Deputy DSL	<p>Mrs. Wendy Newman wnewman@carshaltongirls.org.uk</p>	<p>Miss Hannah Johns johns-h@nonsuchschool.org</p> <p>Mrs. Nicola Bond bond-n@nonsuchschool.org</p> <p>Mrs. Alexis Williamson Jones Williamson-jones-a@nonsuchschool.org</p> <p>Susannah Osborne Osborne-s@nonsuchschool.org</p> <p>Joanna Hicks, Coe-J@nonsuchschool.org</p> <p>Stephanie Morris, Morris-S@nonsuchschool.org</p> <p>Elizabeth Campbell, Campbell-E@nonsuchschool.org</p> <p>Nicola Bond, bond-n@nonsuchschool.org</p>	<p>Mrs. Sam Collins scollins@wallingtongirls.org.uk</p> <p>Mrs. Sian McCormack smccormack@wallingtongirls.org.uk</p> <p>Ms Simone Wilson swilson@wallingtongirls.org.uk</p> <p>Mrs. Tracey Corfield tcorfield@wallingtongirls.org.uk</p>
Governors	<p>Safeguarding Governor</p> <p>Mrs. Jane Ward jward@carshaltongirls.org.uk</p>	<p>Safeguarding Governor</p> <p>Mrs Andrea Cooke Cooke-a@nonsuchschool.org</p>	<p>Safeguarding Governor</p> <p>Tusha Gupta tgupta@wallingtongirls.org.uk</p>

	Mental Health and Wellbeing Governor Ms Claire Rodin crodin@carshaltongirls.org.uk		
GLT Safeguarding Trustee	To be appointed by Trust Board		
Local Authority (referrals should be to the child's local authority)	<p>Sutton Children's First Contact Service</p> <p>020 8770 6001 CFCS@Sutton.gov.uk</p> <p>https://www.sutton.gov.uk/-/what-to-do-if-you-are-worried-about-a-child-children-s-first-contact-service-cfcs</p>	<p>Merton Children and Families Hub</p> <p>020 8545 4226 candfhub@merton.gov.uk</p> <p>https://www.mertonscp.org.uk/what-you-can-do/</p> <p>Croydon Children and Families Single Point of contact 0208 255 2888</p> <p>https://ehmportal.croydon.gov.uk/web/portal/pages/home</p>	<p>Surrey Children's Single Point of Access</p> <p>0300 470 9100 cspa@surreycc.gov.uk <u>Report a concern about a child or young person - Surrey County Council</u> (surreycc.gov.uk)</p> <p>Kingston 0208 547 5008</p> <p><u>Children, families and young people –</u> www.kingston.gov.uk <u>Make a referral to the Single Point of Access - London Borough of Richmond upon Thames</u></p>

APPENDIX E: KEY CONTACTS

Sutton

Children's First Contact Service (CFCS)

020 8770 6001

childrensfirstcontactservice@sutton.gov.uk

Social Care - Out of Hours – Emergency Duty Team

0208 770 5000 x9

Sutton Local Safeguarding Children's Partnership

020 8770 4879

suttonlscp@sutton.gov.uk

Website: www.suttonlscp.org.uk

Sutton LA LADO (Local Authority Designated Officer – complaints against staff)

0208 770 4776

LADO@sutton.gov.uk

LBS Prevent and Hate Crime Manager – 0208 649 0672

Education Safeguarding Manager – 07736 338 180

Escalation procedures: www.suttonlscp.org.uk/lscp-policy-practice

General Contacts:

- Ofsted 0300 123 1231
- Ofsted whistle blowing line – 0300 123 3155
- Police 999
- NSPCC 0808 8005000
- NSPCC whistle blowing helpline number – 0800 028 0285
- ChildLine 0800 11 11

APPENDIX F: IN THE EVENT OF AN EXTENDED SCHOOL CLOSURE DUE TO EXCEPTIONAL CIRCUMSTANCES

The way in which the school can operate in response to an extended school closure due to exceptional circumstances is fundamentally different to 'business as usual'. However, a number of important safeguarding principles will remain the same:

- The best interests of children must always continue to come first.
- If anyone in a school has a safeguarding concern about any child they should continue to act and act immediately.
- A DSL or deputy should be available.
- It is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children.
- Children should continue to be protected when they are online.

This means that the school will continue to implement these Child Protection Policy and Procedures as we have always done.

We will also be mindful that an extended school closure will impact on our interaction with students.

As when the school is open, safeguarding concerns must be reported immediately - verbally in the first instance and then followed up with an e-mail. Do not assume that sending an e-mail means it has been read. All information should be recorded on CPOMS.

Staff will only use agreed platforms and work e-mail addresses to communicate with students (in line with the Trust's Remote Learning Policy Appendix H). Any communications must be professional. Staff will continue to follow the school's Staff ICT Acceptable Use Policy. In practice, this means:

- If you are on camera, you must be appropriately dressed, and in an appropriate area against a neutral background (no personal information should be seen). Staff should not be seen on camera from a bedroom. There should be no confidential items on display. Please note use of cameras for live lessons should be kept to a minimum.
- Language must be professional and appropriate, including any of your family members in the background.
- Be mindful of who else may be in the background or listening to the lesson in the student's home.
- Lessons must be set in line with the school timetable – and any contact with students should be during school hours unless this has been otherwise agreed with SLT.
- If students are not fully dressed, they should be removed from the lesson.
- There should be no 1:1 remote meetings with students – without prior agreement of the Headteacher or DSL.
- When presenting to the class, take care to ensure you only share information appropriate to the lesson – particularly if you have other screens open simultaneously.
- Any breaches should be reported to the Headteacher or DSL immediately.

This also has implications for students accessing the learning as well. In particular:

- Only use Microsoft Teams and work e-mail addresses to communicate with staff.
- If you are on camera, you must be appropriately dressed. If not, you will be removed from the lesson.
- Language must be appropriate, including any of your family members in the background.

- Live lessons should not be recorded or shared in any way.

In the event of an extended school closure due to exceptional circumstances, the school will:

- Follow any national and local statutory guidance and advice
- Communicate with parents and carers on a regular basis ensure that they are signposted to appropriate support and advice
- Communicate with students and ensure that they are signposted to appropriate support and advice.

APPENDIX G: SAFER RECRUITMENT PROCEDURE

1. Introduction

The Girls' Learning Trust (GLT) is committed to safeguarding and promoting the welfare of children and young people. The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2024.

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.

2. Staff Employed by The Trust

2.1 Advertising

When advertising roles, we will make clear:

- The Trust's commitment to safeguarding and promoting the welfare of children and young people.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, such as to the extent to which the role will involve contact with children.

2.2 Application Forms

All applications to The Girls' Learning Trust must be via our Applicant Tracking System (ATS), My New Term, where a standard application form will need to be completed. The application form is fully compliant with GDPR and the latest Keeping Children Safe in Education guidance.

2.3 Shortlisting

Our shortlisting process will involve at least two people (one of whom will be Safer Recruitment trained) and will:

- Consider any inconsistencies and / or gaps in employment and the reasons given for them.
- Explore all potential concerns.

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

- Complete a self-declaration via My New Term, which declares their criminal record or any information that would make them unsuitable to work with children. This will provide them with the opportunity to share relevant information, which can be discussed at the interview stage. The information we will ask includes:
 - Disclosure of criminal convictions (spent and unspent convictions or cautions)
 - Disclosure of police contact
 - Disclosure of child protection investigation
 - Disclosure of relationships
 - Whether they are prohibited from teaching.
 - Whether they are subject to a section 128 direction
 - Disclosure of any pending prosecutions in any country
 - Any relevant overseas information.
- We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Applicants will be informed that we may carry out these checks as part of our due diligence process.

2.4 Seeking references and checking employment history

We will obtain at least two 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 completed by the headteacher/principal.
- 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.

2.5 Interview and selection

When interviewing candidates, we will:

- Require them to bring in all Right to Work documents (and qualifications applicable to the role).
- 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.

2.6 Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). 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 unless a disclosure has been made and the copy will be destroyed before the expiry of 6 months. We will 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 and complete a risk assessment, signed by the Headteacher.
- 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.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school 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 (with the exception of sickness or maternity leave).

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 (assurance) 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, including seeing photo ID and the original DBS certificate if this has previously not been seen.

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.

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.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

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.

Trustees / Governors and members

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 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

2.7 Incomplete vetting

Where information cannot be obtained prior to the individual being in school, such as in the case of a Foreign Language Assistant newly arrived in the country, the school will ensure that all available

information has been obtained. The HR team will liaise with the Headteacher to prepare a risk assessment based on the information available, arrangements for access to children, and any other pertinent information. The risk assessment will document the controls put in place to manage and/or mitigate the risk. The risk assessment will be monitored monthly by the HR Advisor, in the updating and checking of the Single Central Register and will be closed once the full information has been obtained.

3. Monitoring of Safer Recruitment Procedures

In the interests of maintaining a safe school culture, the CEO and the Trust Board will review the safeguarding procedures annually (normally through the Trust HR Committee).

APPENDIX H: GLT REMOTE LEARNING PROTOCOLS

These protocols should be followed alongside advice and directions from Headteachers in schools.

The aims of this protocol are:

- To ensure fair and equal access to the learning experience for all students and staff.
- To ensure that the workload of all students and staff is fair, reasonable and sustainable over the long term.
- To ensure that all students and staff are fully safeguarded throughout the period of school closure.

Following discussion with the Executive Team and the Head of IT, and taking account of advice from the joint teaching unions, the following protocols for remote learning across the Trust have been agreed.

They have been formulated based on the significant differences in home learning resources available to students and staff; with many people now having to work from, or study at, home it will not always be possible for everyone to have access to all the technologies required. Where it is known that students do not have IT access, we are aiming to arrange for printed materials to be posted to their homes.

There is also a clear feeling among students and staff that attempts to fully recreate the school day and homework timetable online are exhausting and increasing anxiety. Furthermore, while it is acknowledged that some staff would like to develop more interactive ways of engaging with students, there needs to be an understanding of the impact this can have on placing extra demands upon, and extra expectations of, colleagues.

The protocols are:

1. Contact between students and teachers should only be through the school's designated virtual learning platform (TEAMS, FROG or Show My Homework) or school email account. Interactive contact must not be through personalised accounts open to public viewing, comments or sharing (e.g. Google Classroom), although pre-recorded content may be posted on YouTube – please check with your Head if you are unsure.
2. Staff should not engage in any video-calling with students in KS3 and KS4. In some situations at KS5, where all students in a subject and year group (e.g. Year 12 French) are known to have IT access, video-calling may be used by agreement with the Head and subject to the proviso that there is access for all students in the subject and year group. 1-to-1 video-calling with students is not permitted and the whole class must be present.
3. Pre-recorded lessons may be used in some situations, but there is no expectation that staff use them. If pre-recorded lessons are used, they must be available to all students of the subject each year group (to ensure consistency of provision) and must be distributable by current means (email and agreed virtual learning platforms for your school – check with your Head if you are unsure). If you are uploading pre-recorded lessons remember to stay safe and make sure to film in a neutral area where nothing personal or inappropriate can be seen or heard in the background. Also, please note that, we have taken the decision that no video-editing support can be provided by

the IT Team due to the operational requirements of maintaining all 3 IT networks for the benefit of all staff and students.

4. While it may be appropriate for staff to make telephone calls to a student (e.g. form staff checking on their tutees or vulnerable students), staff must make sure that parents are aware and always block a personal home/mobile telephone number (check how to do this with your phone provider). Do not use or exchange personal email addresses or phone numbers with students. If a member of staff must use a personal phone for making contact, any additional costs incurred will be reimbursed through the normal Expenses Policy.
5. Staff must follow the instructions of the Head and Designated Safeguarding Leads (DSLs) in each school. In exceptional cases, and by prior agreement with the Head, video-calling may be used by named school counsellors and ELSAs.
6. Adopt a common sense approach to school work and engagement with students and make sure that neither students and their parents, nor you or your colleagues, become overwhelmed by unrealistic expectations and workload. Two to three hours work per day across all subjects is plenty for students.
7. Microsoft Teams is now available to all staff. All staff will receive a copy of the user guide and an email invitation from Teams asking them to login as their groups are populated.
8. The Microsoft Teams platform can be used currently for staff interaction only – for example, department and team meetings with colleagues - but must not be used with students. Please do not invite any student to a Microsoft Teams meeting. No other video-conferencing platforms (such as Zoom, Google Classroom) will be supported at this time. We will be exploring the limited use of Teams - for Sixth Form lessons only - after the Easter break.
9. Be mindful of the responsibilities of the IT team; our IT systems support almost 5,000 users – staff and students - across 3 schools. During this time, it will not be possible to meet individual demands for bespoke IT solutions, and IT staff will prioritise helping teachers and support staff who are having difficulties accessing and using the approved processes and IT systems in each school.