

# Safeguarding and Child Protection Policy – For REAch2 Central Staff

Audience:	Parents School staff / Central Team / All REAch2 Employees Local Governing Bodies Cluster Boards Trustees Local Authority
Ratified:	REAch2 Trust Board 14 <sup>th</sup> July 2022
Other related policies:	Safeguarding and Child Protection (for Academies) Health and Safety Recruitment Whistleblowing
Policy owner:	Helen Beattie, Head of Safeguarding
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At REAch2, our actions and our intentions as school leaders are guided by our Touchstones.

- Integrity** We recognise that we lead by example and if we want children to grow up to behave appropriately and with integrity then we must model this behaviour
- Responsibility** We act judiciously with sensitivity and care. We don't make excuses, but mindfully answer for actions and continually seek to make improvements
- Inclusion** We acknowledge and celebrate that all people are different and can play a role in the REAch2 family whatever their background or learning style
- Enjoyment** Providing learning that is relevant, motivating and engaging releases a child's curiosity and fun, so that a task can be tackled and their goals achieved
- Inspiration** Inspiration breathes life into our schools. Introducing children to influential experiences of people and place, motivates them to live their lives to the full
- Learning** Children and adults will flourish in their learning and through learning discover a future that is worth pursuing
- Leadership** REAch2 aspires for high quality leadership by seeking out talent, developing potential and spotting the possible in people as well as the actual

# Contents

<b>Policy Overview</b> .....	<b>4</b>
Overarching Principles .....	4
Roles and Responsibilities .....	4
How This Relates to National Guidance and Statutory Requirements .....	4
Definitions .....	5
<b>Policy in Detail</b> .....	<b>5</b>
The role and responsibilities of the Designated Safeguarding Lead.....	5
Induction and training .....	6
Types of abuse and specific safeguarding issues .....	6
Processes, procedures, and inter-agency liaison .....	6
Safer recruitment and the Single Central Record .....	7
Safer working practice .....	7
<b>Implementation</b> .....	<b>8</b>
<b>Policy Review</b> .....	<b>8</b>
<b>Appendices</b> .....	<b>9</b>
ANNEX 1 – Types of abuse .....	9
<i>Children potentially at greater risk of harm</i> .....	9
<i>Child on child / peer on peer abuse</i> .....	10
<i>Gangs, youth violence, and serious violent crime</i> .....	10
<i>Exploitation, including child criminal exploitation (CCE) and child sexual exploitation (CSE)</i> .....	11
<i>Children with family members in prison, and children in the court system</i> .....	11
<i>Domestic abuse</i> .....	11
<i>Homelessness</i> .....	11
<i>'Honour based' abuse, including Female Genital Mutilation, Breast Ironing and Forced Marriage</i> .....	12
<i>Radicalisation</i> .....	12
<i>Children Missing Education</i> .....	12
<i>Elective Home Education</i> .....	12
<i>Online safety</i> .....	13
<i>Children with Special Education Needs and Disabilities (SEND)</i> .....	13
<i>Looked After Children, and previously Looked After Children</i> .....	13
<i>Children who are lesbian, gay, bisexual or transgender (LGBT)</i> .....	14
ANNEX 2 – Safeguarding concerns and allegations .....	15
<i>Staff awareness</i> .....	15
<i>Low level concerns</i> .....	15

*Reporting a safeguarding concern* ..... 16

*Referral process*..... 16

*Information sharing* ..... 16

*Managing the situation*..... 17

*Record keeping*..... 17

*Learning lessons* ..... 17

## Policy Overview

### Overarching Principles

We recognise that academies and academy personnel are in a unique position in their care of children. The responsibility for all staff to safeguard pupils and promote their welfare, as stated in Section 175 of the Education Act (2002), is one that is central to our ethos, our policies and our actions, and this responsibility extends to all staff in the REAch2 central team. All children are deserving of the highest levels of care and safeguarding, regardless of their individual characteristics or circumstances, and we are committed to applying this policy to ensure effective levels of safeguarding and care are afforded to all of our pupils. It is essential that all actions are taken first and foremost in the best interest of our pupils. This policy sets out guidance and procedures that our Trust will follow to ensure appropriate action is taken in a timely manner to safeguard and promote the welfare of our pupils. Its contents are intended to be in accordance with all relevant Government guidelines and legislation.

### Intended impact

- To enable all pupils to feel safe and cared for whilst at academies in our Trust, and to ensure that they have a safe place and safe people to whom they can turn.
- To enable all adults involved with our trust to be fully equipped to fulfil their responsibilities in effectively promoting the safeguarding and welfare of all of our pupils.

### Roles and Responsibilities

- Pupils will: adhere to academy rules regarding conduct and safe behaviour; report anything that worries them to a trusted adult.
- Parents/carers will: work collaboratively with academy staff to promote the safety of their children and of other pupils; support their academy to teach pupils about keeping safe by reinforcing key safety messages; report any safeguarding concerns regarding their own children or another pupil to the academy.
- Academies will: ensure that all pupils have a safe learning environment and are taught about how to keep safe; train and support all adults involved with their academy to appropriately identify and respond to any pupil at risk of harm; work collaboratively with parents and professional agencies to safeguard pupils.
- Governors will: ensure their academy's safeguarding policy is applied robustly throughout; review it regularly (annually at a minimum) to ensure the effectiveness and rigor of safeguarding practice at their academy.
- REAch2 central staff will: know, understand and follow the safeguarding procedures for each academy within which they work; undertake relevant regular training and updates to ensure their skills and knowledge support them to meet their safeguarding responsibility.
- REAch2 safeguarding team members will: advise and challenge academies and their staff to support them in deploying best practice to meet their statutory safeguarding responsibilities.

### How This Relates to National Guidance and Statutory Requirements

Statutory safeguarding and child protection practice for schools and academies is outlined in the following legislation and documents, with which this policy intends to be in accordance:

- Legal: Section 175, Education Act (2002); Section 26, Counter Terrorism and Security Act (2015); Human Rights Act (1998); Equality Act (2010)
- Government: Working Together to Safeguard Children (2018); What to do if you're worried a child is being abused (2015); Keeping children safe in education (2022); Children missing education (2016);

Sexual violence and sexual harassment between children in schools (2021); The designated teacher for looked after and previously looked after children (2018); Information Sharing, Advice for practitioners providing safeguarding services (2018); Teaching online safety in schools (2019); Relationships education, relationships and sex education, and health education (2019)

- Ofsted: Inspecting safeguarding in early years, education and skills settings (2021)

## Definitions

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (2022) as: *'protecting children from maltreatment, preventing impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.'*

## Policy in Detail

### The role and responsibilities of the Designated Safeguarding Lead

- Each academy will appoint a senior member of staff from its leadership team to act as the Designated Safeguarding Lead (DSL) This person will coordinate all safeguarding and child protection procedures at the academy, including those related to online safety, and will take lead responsibility for this area, which will be specified in their job description.
- Each academy will also appoint one or more Deputy Designated Safeguarding Leads, who will be trained to the same level as the Lead, will have their Deputy Designated Safeguarding Lead role included in their job description, and to whom activities may be delegated.
- Central staff will familiarise themselves with the name and role of the Designated Safeguarding Lead, and of the Deputy Designated Safeguarding Lead(s), so that they know to whom any concerns about a pupil must be reported. This information can be ascertained by reading the academy's safeguarding and child protection policy (published on the academy website) or by asking a member of office staff upon arrival at the academy.
- During school hours, the Designated Safeguarding Lead or their Deputy will be available to discuss any safeguarding concerns, either in person or, in exceptional circumstances, via phone or other modes of communication. The Designated Safeguarding Lead will make appropriate cover arrangements for any requirements or activities taking place out of school hours and during school holidays. In the event that the Designated Safeguarding Lead is absent, the Headteacher will arrange for suitable cover from the Deputy Designated Safeguarding Lead(s); if the Headteacher is the Designated Safeguarding Lead, the Deputy Director of Education will make these arrangements with the Deputy Designated Safeguarding Lead(s), supported by the relevant member of the REAch2 safeguarding lead, as required.
- The Designated Safeguarding Lead and their Deputy will undergo suitable training, including Prevent training, to equip them with the skills and knowledge required to undertake their role, which will be updated at a minimum every two years; in addition, their skills and knowledge will be refreshed at regular intervals, annually at a minimum.
- The Designated Safeguarding Lead and their Deputy will ensure that all staff know and understand the safeguarding and child protection procedures at their academy, as well as knowing, and working effectively with, the local inter-agency procedures for assessment of early help needs and for referrals of suspected cases of abuse.
- The Designated Safeguarding Lead and their Deputy are expected to oversee and manage all referrals of suspected abuse that are made to Social Care, Police, Channel, and other agencies, and will also support and liaise with any academy and Trust staff who have either been involved in making such referrals or who have concerns about a pupil which may subsequently require a referral.

- The Designated Safeguarding Lead and their Deputy will maintain detailed and secure written or electronic records of any concerns and referrals, and all subsequent follow up actions/communications.

### **Induction and training**

- Each new member of the central team will receive safeguarding induction as part of their 'on-boarding' induction programme. Policies and statutory information will also be shared during this process, and any policy updates will be shared during subsequent refresher sessions (see page 8, 'Implementation', for further information)
- Safeguarding training will be delivered by the Trust-approved online learning system (Flick) The child protection module is required to be completed within four weeks of starting work with REAch2. Training will be refreshed on an annual basis, and more frequently if the individual's role, or if changes to statutory safeguarding requirements, requires it. Additional training will also be given to central staff where the nature of the role being undertaken requires it, i.e. frequent contact with pupils.
- Safeguarding training for central staff will teach them, as a minimum, about the types of abuse, including specific safeguarding issues; the adult's role in recognising and responding to abuse; and the processes for recording and following up on any safeguarding concerns.

### **Types of abuse and specific safeguarding issues**

- We recognise that adults working in our academies are in a unique position to recognise and respond to signs of abuse, and that these can take place and manifest in a variety of ways, including peer on peer.
- Induction training and refresher sessions will equip staff to understand the different types of abuse, including specific safeguarding issues such as Female Genital Mutilation and radicalisation, and support them to know how to respond to any safeguarding concerns.
- Annex 1, pages 9 – 14, details our approach to dealing with the risks posed by abuse, and how we identify and respond to any signs of abuse.

### **Processes, procedures, and inter-agency liaison**

- Each academy has a clear procedure for responding to any possible signs of abuse, as outlined in their safeguarding and child protection policy. It is the responsibility of each central team staff member to ask for a summary of key safeguarding information relevant to the academy that they are visiting upon arrival; this will typically take the form of a visitors' leaflet. Each academy's full safeguarding and child protection policy is available on academy websites, which should be consulted for further information and detail if required.
- If a member of the central team has a safeguarding concern about a pupil, they must ask to speak to the Designated Safeguarding Lead or, in their absence, a Deputy Designated Safeguarding Lead, to whom the concern must be reported. This must be done as soon as is practically possible, and under no circumstances should the reporting of a concern be delayed or withheld.
- Any safeguarding concern reported verbally to a Designated Safeguarding Lead or their Deputy will need to be recorded in writing on a safeguarding concern form. Further details about each academy's process for recording safeguarding concerns can be found in Annex 3 of their safeguarding and child protection policy.
- Upon receiving a concern which indicates a suspicion of abuse, the Designated Safeguarding Lead or their Deputy will follow local inter-agency procedures, local information sharing protocols and statutory/legal expectations in deciding if a referral to an external agency is warranted. It is important to note that whilst a referral would typically be made by the Designated Safeguarding Lead or their Deputy, any member of staff can make a referral. Further details about each academy's process for

referring safeguarding concerns can be found in Annex 4 of their safeguarding and child protection policy.

- We recognise that early intervention when a child or family is starting to show signs of concern can be critical to ensure that the right help and support is sourced, preventing any further escalation of issues or a decline in the child's safety and wellbeing.

In a case where a concern about a pupil does not suggest a risk of significant harm but they remain in need of additional support, the Designated Safeguarding Lead or their Deputy will liaise with parents and, with their permission, follow local Early Help Assessment guidelines in order to source the most appropriate support.

- If a member of the central team has any concerns about the way a concern that they have raised has been handled, they should address this in the first instance to the Headteacher. If resolution cannot be reached, the matter should be referred to the REAch2 Head of Safeguarding.

### **Safer recruitment and the Single Central Record**

- We recognise that it is critical to ensure that our pupils are taught and supported by adults who are safe to do so, and that we are responsible for promoting a culture of safety within our Trust and our academies by preventing unsafe adults from having access to them.
- In line with expected practice for safer recruitment, a minimum of one member of Trust staff who has undertaken REAch2 training in safer recruitment will be present on any interview panel when recruiting to the central team.
- A Single Central Record is maintained by the REAch2 HR team, detailing the required and relevant recruitment and vetting checks undertaken on all central team members and Trustees. This document is shared with our academies, and they retain a copy of it on their own academy Single Central Record for reference.
- Please see our Recruitment policy for further detail regarding our adherence to safer recruitment principles.

### **Safer working practice**

- All professionals working with children have a responsibility to keep them safe from harm, and it is important that anyone entering into any of our academies is aware of any behaviour that may be considered illegal, unsafe, unprofessional, and/or unwise in the context of working with children.
- Staff should be aware of the way they present to and communicate with children, including their dress and appearance. Staff need to be dressed and presented appropriately to enable them to safely undertake their role.
- REAch2 ID badges will be checked and cross referenced to the Single Central Record upon arrival to any academy; badges must be worn and remain visible at all times.
- Both verbal language and body language need to be considered carefully to ensure communication and its intentions are clear and unambiguous.
- All planned contact and/or communication with pupils must be agreed with a member of the academy's Senior Leadership Team in advance, and take place in an open space, clearly in view of a member of academy staff.
- Mobile devices should be kept silent and stored out of sight when in any academy; if this is not possible, or if a mobile device is explicitly required during the course of your visit, then permission to do so must be sought from a member of the academy's Senior Leadership Team upon arrival.
- Staff should not use their mobile devices when working with pupils, nor should a pupil be allowed to use a staff member's mobile device under any circumstances.
- Please refer to the academy's Code of Conduct and pupil behaviour policy for expectations and specific guidance on adult behaviour in each setting.



## Implementation

This policy applies to all adults within the REAch2 central team, including Trustees and non-Executives. It will be publicly available on our Trust website, and will be available in paper form upon request. We will also make available and/or signpost all relevant statutory and legislation safeguarding and child protection documentation to staff for their reference.

At the beginning of the academic year, all central staff working directly with children will be issued with a copy of this policy together with Part 1 and Annex B of Keeping Children Safe in Education (2022) All central staff not working directly with children will be issued with a copy of this policy together with Annex A of Keeping Children Safe in Education (2022) in order to provide a better basis for these individuals to understand how to safeguard and promote the welfare of children. All staff will be required to sign a confirmation that they have received, read and understood these documents, and that they agree to abide by their contents.

Any new central team staff who join subsequent to the annual policy issue will receive a safeguarding induction, where they will be issued with a copy of this policy together with Part 1 and Annex B of Keeping Children Safe in Education (2022), if they work directly with children, or a copy of this policy together with Annex A of Keeping Children Safe in Education (2022), if they do not work directly with children. New staff will be required to sign a confirmation that they have received, read and understood these documents, and that they agree to abide by their contents.

Additionally, the REAch2 safeguarding team will support central staff and REAch2 academies in their implementation of this policy through the REAch2 safeguarding strategy. All members of this team have received Designated Safeguarding Lead training, and have been assessed to have the knowledge, skills and experience required to undertake this role.

Failure by any central staff member to implement this policy will be considered an act of misconduct, and will be dealt with in line with relevant Trust policies. Any concerns about compliance with this policy should be raised as a concern, in line with Annex Two of this policy.

## Policy Review

The content of this policy will be reviewed by REAch2 Trustees annually as per statutory requirements, or sooner if required, i.e. in the case of a mid-year update to statutory guidance in Keeping Children Safe in Education.

## Appendices

### ANNEX 1 – Types of abuse

We are aware that all children are potentially vulnerable to abuse. It can take place at home, in the academy environment, in the wider community and online; be committed by adults and by other children; be inflicted by people known to the child and by strangers; be a consequence of an act of deliberate harm and from failing to take necessary steps to prevent the child from coming to harm.

The four main types of abuse referred to in Keeping Children Safe in Education (2022), and a summary of their definitions, are:

- physical: 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: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development; may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person, not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate, age or developmentally inappropriate expectations being imposed, interactions that are beyond their developmental capability as well as overprotection and limitation of exploration and learning, or preventing them from participating in normal social interaction, seeing or hearing the ill-treatment of another, serious bullying (including cyberbullying), causing them frequently to feel frightened or in danger, or exploitation or corruption
- sexual: forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening; may involve physical contact, including penetrative or non-penetrative acts, non-physical contact, grooming a child in preparation for abuse, and online sexual abuse
- 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; may involve failure to provide adequate food, clothing and shelter, failure to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision, failure to ensure access to appropriate medical care or treatment, and failure to meet a child's basic emotional needs

High quality training, which is regularly updated, ensures all adults involved with our academies are familiar with the definitions of abuse, actions that constitute each of the four categories, and the signs of each type of abuse, including online, so that pupils who may be in need of help or protection are appropriately identified.

In addition to the above, we recognise that there are a number of specific safeguarding issues that require special consideration due to their complex nature. All staff and volunteers working directly with pupils will be issued with a copy of Part 1 and Annex B of Keeping Children Safe in Education (2022), containing the full outline of specific safeguarding issues, and their accompanying guidance documents and resources, with which they are expected to be familiar.

#### *Children potentially at greater risk of harm*

- We recognise that children who have a Social Worker may have needed this due to abuse, neglect, and complex family circumstances, and that this potentially leaves them vulnerable to further harm. We also recognise that research shows that children who have a Social Worker, or have had a Social Worker, are at risk of lower educational outcomes than their peers.

- When an academy is alerted to a pupil having a Social Worker, the Designated Safeguarding Lead will inform central staff working in the academy if required and on a case-by-case basis in order to ensure the best interests of the pupil are being considered with regards to their safety, welfare and educational outcomes.

#### *Child on child / peer on peer abuse*

- Some children may abuse their peers, which can manifest in many ways, including bullying, physical abuse, sexual abuse, harassment and violence, 'sexting', up skirting, and initiation/hazing. Child on child / peer on peer abuse of all types can take place inside and outside of our academies, and can be face to face or online.
- Harmful or abusive behaviour, including that which is of a sexualised nature, between pupils in our academies is not tolerated: we do not believe that it is to be expected, or to be accepted. We recognise that child on child / peer on peer abuse, particularly that which is sexual, is more likely to see boys as perpetrators and girls as victims; staff will be alert to this, but will ensure that all incidents of child on child / peer on peer abuse are taken equally seriously, regardless of the nature, identity or gender of the perpetrator and victim/s.
- With regards to child on child / peer on peer sexual abuse, we are aware of the outcomes of Ofsted's 2021 rapid review, and understand the importance of adopting an attitude of 'it is happening here' amongst our Trust and academy leaders and staff, regardless of whether there have been any specific reports from our pupils, in order to promote and embed a culture of constant awareness and vigilance.
- Any report of child on child / peer on peer abuse will be swiftly investigated by academy staff, recorded and responded to in line with the academy's behaviour and anti-bullying policies, and, in the case of sexual abuse, in line with Part Five of Keeping Children Safe in Education (2022) The Brook Traffic Light Tool will be used to identify, understand and respond to the behaviour, in which a member of each academy's DSL team has received training, and the language of the Tool, i.e. red/orange/green, will be reflected in the record keeping for each incident.
- Where appropriate, this may include sanctions, separation or change of class, exclusion, referral to Early Help, Social Care and/or Police. Victim/s will be reassured, and both victim/s and perpetrator/s will receive appropriate support and guidance to safeguard and protect them and to ensure that their wellbeing is being promoted.
- Academies will use their curriculum to minimise the risk of child on child / peer on peer abuse taking place. This will help pupils understand, age-appropriately, what abuse is, and what the academy's policy and expectations are of their behaviour and conduct to each other, reassuring them that any concerns they have will be taken seriously and encouraging them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable or unsafe.

#### *Gangs, youth violence, and serious violent crime*

- We recognise that children are vulnerable, at any age, to being drawn into a gang environment and/or being targeted as perpetrators or victims of violence to others. Risk factors for such activity, including frequent absence from school and exclusion, will be considered by our academies in their application attendance and behaviour policies.
- We understand the positive impact that education, and spotting and responding to early warning signs of gang behaviour and violence, can have on affecting a positive outcome for a child and for building resilience to gang culture.
- We will be vigilant to any signs of our pupils being drawn into, or affected by, gangs, youth violence, and serious violent crime, and academies will work with local agencies to safeguard any perpetrators and/or victims.

*Exploitation, including child criminal exploitation (CCE) and child sexual exploitation (CSE), ), trafficking and modern slavery*

- It is understood that any child of any age is vulnerable to the risks of exploitation, including child criminal and child sexual exploitation, **trafficking and modern slavery** and that this risk is not limited to older children or adolescents. Children can be exploited by adults, but children can also be used to exploit other children. Exploitation can take place online as well as face to face. We recognise that both girls and boys can be exploited, both criminally and sexually, and that the experience of girls and boys, as well as the indicators of the risk they are facing, may differ.
- We are alert to the signs and indicators of a pupil becoming at risk of, or subject to, all forms of exploitation, including but not limited to: gang and violence-related activity; criminal and anti-social behaviour; going missing from education; underage and/or illegal sexual activity; risky behaviour, including behaviour online.
- In addition, we are alert to the signs and indicators of a pupil becoming at risk of, or subject to, exploitation for the purposes of county lines, a term used to describe exportation of illegal drugs by criminal networks between different locations in the UK. This includes but is not limited to: going missing from education; awareness, knowledge and use of alcohol and illegal substances.
- In our academies, the Designated Safeguarding Lead is the named professional for issues related to exploitation, and will work with local agencies as required to safeguard pupils at risk of, or subject to, exploitation.

*Children with family members in prison, and children in the court system*

- We recognise the significant impact that a parent being in prison can have on a child's outcomes, academically, emotionally and financially.
- We also recognise that children can be required to give evidence in court, either as victims or as witnesses, and that this is an experience likely to have a significant impact on them.
- Both of the above issues require bespoke support to ensure that the impact on the child's wellbeing is minimised. Academies will seek appropriate professional support for any of our pupils who are in these circumstances, and ensure that pastoral provision actively supports and monitors their progress.

*Domestic abuse*

- Seeing, hearing or experiencing domestic abuse, defined as controlling, coercive, threatening, violent and abusive behaviour between partners, ex-partners and family members, poses a serious risk to children, and we recognise the serious and long lasting impact it can have on their health, wellbeing, development and ability to learn. Children experiencing domestic abuse are now recognised in law as victims.
- Training will support academy staff to know and understand the types of domestic abuse, including physical, emotional, psychological, sexual and financial, its risks, regardless of whether the child has been physically injured or not, and to recognise any incident of domestic abuse witnessed or experienced by our pupils as a potential safeguarding issue. Where necessary, academies will work with local agency professionals to respond to any reported incidents of domestic abuse.

*Homelessness*

- We recognise that homelessness, and the risk of homelessness, places a child's welfare at significant risk, being at risk of poverty, exploitation, and becoming missing from education, amongst others.
- Timely intervention when a risk of homelessness is first identified is critical in preventing a situation from escalating and homelessness becoming a reality. Academies will work closely with families

identified to be at risk, and with professional from relevant local agencies, to put appropriate measures into place to minimise the risk of homelessness.

#### ***'Honour based' abuse, including Female Genital Mutilation, Breast Ironing and Forced Marriage***

- 'Honour based' abuse refers to actions committed under a belief of protecting or defending the honour of a family or community. Regardless of the motivation or circumstances, we recognise that these acts are illegal and abusive, and should be responded to as such.
- We are aware of, and will adhere to, the legal duty placed on teachers to notify the Police of any confirmed cases of Female Genital Mutilation carried out on a girl under the age of 18.
- We are alert to the signs and indicators of a pupil being at risk of 'honour based' abuse, and academies will work with local agencies as required to safeguard these pupils.

#### ***Radicalisation***

- Under the Counter Terrorism and Security Act (2015) academies are required to have 'due regard to the need to prevent people from being drawn into terrorism', otherwise known as the 'Prevent duty'.
- We are alert to the signs and indicators of a pupil showing signs of radicalisation and of being at risk of being drawn into terrorism, and academies will work with local agencies and the Channel programme as required to safeguard these pupils.
- In our academies, the Designated Safeguarding Lead is the named professional for radicalisation, who has an appropriate knowledge of the risks associated with the local area and is aware of the local referral processes for raising a Prevent concern.
- We recognise that a broad and balanced curriculum will support pupils in developing resilience to extremist ideology; therefore, learning opportunities will promote pupils' spiritual, moral, cultural, mental and physical development, prepare them for the opportunities, responsibilities and experiences of life, promote community cohesion and British values, and provide a safe space in which they can understand, discuss and learn to challenge sensitive topics.

#### ***Children Missing Education***

- We recognise that a child missing from education can be an indicator of abuse or neglect, including a risk of exploitation, 'honour based' abuse and radicalisation, as outlined above.
- In our academies, robust procedures are in place for monitoring and responding to pupil attendance, as outlined in each academy's Attendance policy, including, where possible, recording more than one emergency contact for each pupil.
- In line with Children Missing Education (2016) and Local Authority procedures, academies will work with local agencies and make timely referrals as required to ensure that circumstances where children are missing from education are swiftly and appropriately responded to.

#### ***Elective Home Education***

- We are alert to the possible risks posed to children if they are removed from school roll by their parents to be educated at home, especially if they are vulnerable, have a Social Worker or have SEND.
- Academies will work with parents and colleagues in their Local Authority and other relevant local agencies to ensure that due consideration has been given by all to what is in the best interests of the child.
- Academies will follow Local Authority procedures to notify of any child who is removed off school roll where a parent has indicated their decision to home educate.

### *Online safety*

- Technology has become a significant risk factor in safeguarding children, and we recognise our responsibility to protect our pupils from the risks of inappropriate content and contact from inappropriate people, as well as educating them about how to conduct themselves safely online.
- Staff in our academies are alert to the risks posed to pupils via their use of technology, typically referred to as 'the four Cs' (content: harmful or illegal content; contact: harmful online interaction with other users; conduct: personal online behaviour that causes harm or increases the risk of harm; commerce: risks such as online gambling or phishing) Staff receive appropriate training to support them in ensuring that any online risks are swiftly identified and responded to, in line with our behaviour policy as required, and escalated to local agencies for additional support as required.
- The Computing curriculum, together with assemblies and other learning opportunities, will equip our pupils with the necessary knowledge and skills to take best advantage of the many opportunities that technology brings whilst acting safely and responsibly whilst using technology. It will take into account all of the guidance contained within Government documents to ensure that pupils are sufficiently protected and educated with regards to online safety.

### *Children with Special Education Needs and Disabilities (SEND)*

- We recognise that pupils with SEND, including those with physical and mental health conditions, face additional challenges in keeping safe, and that they may be subject to increased risk by virtue of their special need or disability. Their physical and emotional needs, behaviour, mood, difficulties with communication, and proneness to isolation and to bullying all make them more vulnerable to abuse, and more vulnerable to abuse being overlooked or ascribed to a different cause.
- Staff working with pupils with SEND who are non-verbal or have limited communication will be particularly vigilant of potential signs of abuse, such as changes in mood and behaviour, suspicious marks, etc, and will promptly respond to these signs by following the safeguarding procedures detailed above.
- Academies will ensure that pupils with SEND receive appropriate pastoral provision, which, if necessary, may be additional to that provided to non-SEND pupils, and that they are taught in a way that is appropriate to their developmental stage about keeping safe and about sharing any worries or concerns with a trusted adult.
- Use of 'reasonable force', referring to use of physical contact to control or restrain a pupil, is sanctioned in schools when it is being used to safeguard. The additional vulnerabilities of pupils with SEND in the use of reasonable force is known and understood, and our academies are committed to reducing the risk posed to these pupils and limiting the need for use of reasonable force through pastoral support and behaviour management systems.
- From time to time, pupils with SEND may need to receive additional support, or part-time/full-time education, from an Alternative Provision so that their needs can best be met. Academies will take responsibility for assuring themselves that the policies and procedures for keeping children safe at the Alternative Provision, including those relating to safeguarding and to safer recruitment, are sufficiently robust and are in line with statutory expectations.

### *Looked After Children, and previously Looked After Children*

- Children are most commonly taken into care following abuse or neglect; consequently, pupils who are Looked After or previously Looked After, including those who have been adopted from care or are subject to care orders, can be vulnerable as a result of their historical experiences, as well as with their current care arrangements.
- Each academy will appoint a Designated Teacher, who is responsible for monitoring the progress and wellbeing of all Looked After Children, and for liaising with both academy staff and professionals from external agencies to ensure appropriate provision to meet their academic, developmental and

welfare needs. The Designated Teacher will also be responsible for monitoring the progress and wellbeing of all previously Looked After Children, ensuring that they have appropriate provision to meet their needs.

*Children who are lesbian, gay, bisexual or transgender (LGBT)*

- We recognise that identifying as LGBT is not in itself a risk factor for harm; however, LGBT children, or children perceived to be LGBT, can be targets for bullying and abuse by their peers, the risks of which can be compounded if they do not have a trusted adult with whom to share these concerns.
- Our academies will endeavour to provide a safe space for LGBT children to discuss concerns, and remove any additional barriers that may prevent this.
- In line with the Trust's Relationships, Health and Sex education policy, our academies will ensure that pupils are taught at an age-appropriate point about LGBT relationships.

## **ANNEX 2 – Safeguarding concerns and allegations**

Keeping Children Safe in Education (2022) defines an allegation of abuse against an adult in a school or academy as any case in which it is alleged that an adult (including employed staff, supply staff and volunteers) has:

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

This policy is designed to work in full accordance with the statutory guidelines set out within Part Four, Keeping Children Safe in Education (2022) which describes the expected process for managing safeguarding concerns and allegations in detail. Headteachers, members of the school and REAch2 Senior Leadership Teams, including Deputy Directors of Education, and Chairs of Governors will familiarise themselves with this document, plus any guidance specific to the Local Authority where any concern is raised; however, key principles are summarised below.

### *Staff awareness*

- All central staff will be issued with this policy, which is intended not only to support them in adopting safe practice in their work with children but also to advise on how to report any concerns about the conduct of a colleague or any practice in an academy which they feel is unsafe for our pupils.
- Additionally, all staff and volunteers are signposted to the Ofsted Whistle-blower Helpline, 0300 123 3155, and to the NSPCC Whistleblowing Advice helpline, 0800 028 0285.
- Visitors to the academy, including contractor and agency staff, will be provided with relevant information in line with the academy's policy on visitors.

### *Low level concerns*

- We recognise that, at times, a concern about an adult's conduct towards pupils may not be serious enough to be considered as an allegation, but that it nonetheless indicates a concern.
- For the purposes of this policy, a low-level concern is defined as a concern relating to behaviour that is inconsistent with an academy's Code of Conduct, but does not meet the threshold for an allegation of abuse, as outlined in Keeping Children Safe in Education (2022) and copied above.
- We understand the importance of creating a culture of openness and transparency, where any concern, no matter how small, is shared and dealt with appropriately. Such a culture supports us to identify and address any emerging or inappropriate behaviour at an early stage, minimising the risk of abuse and reinforcing clear professional boundaries.
- Central staff are required to report any low-level concern about the conduct of any adult working in our academy to the academy's Headteacher. In the event that the concern is about the Headteacher, this should be reported to the Deputy Director of Education and Chair of Governors. Please see Annex 2 of the academy's safeguarding policy for the contact details for these individuals.
- All staff are encouraged to recognise any occasion where their own behaviour may be seen as a low-level concern by others, and to make a self-report accordingly.
- Upon receipt of a low-level concern, the Headteacher will take timely and proportionate action to discuss and address this with the person concerned in order to correct the issue at an early stage. The Trust safeguarding and HR teams are available to support with this process if required. If at any stage the Headteacher assesses that there is a risk of harm to pupils, they will follow the process outlined below for reporting a safeguarding concern.
- The Headteacher will keep a written record of all low-level concerns, detailing the nature of the concern and the action taken to address it. The record will be clearly demarcated as a low-level



concern, in order to avoid confusion or misunderstanding. Records of low-level concerns will not be referred to in employer references unless they form part of a substantiated allegation.

### *Reporting a safeguarding concern*

- If any adult working in the central team has a safeguarding concern about another adult or has concerns about another adult posing a risk to children, they should report these concerns. This duty is applied regardless of whether the person about whom there are concerns is an academy staff member, volunteer (including Governors), central staff member or external visitor, i.e., supply teacher.
- All reports of safeguarding concern about academy staff, an academy volunteer (including Governors) or external visitor must be made directly to the Headteacher. Exceptionally, in the Headteacher's absence, the report may be made to the next senior member of staff who is acting as the Headteacher in their place.
- Where the safeguarding concern relates to the Headteacher, or to the person acting as the Headteacher in the Headteacher's absence, it must be reported to the Deputy Director of Education and to the Chair of Governors. Please see Annex 2 of the academy's safeguarding and child protection policy for the contact details for these individuals.
- All reports of safeguarding concern about a member of the central team must be made initially to the Headteacher of the school where the concern arose (if relevant) and then subsequently to the REAch2 Head of Safeguarding, who, as required, will liaise with the Headteacher concerned. Where the safeguarding concern relates to the Head of Safeguarding, the concern must be reported to the Director of Excellence and Standards.
- If the report of safeguarding concern is made verbally, it must be followed up in writing by the person reporting the concern, as directed by the person to whom the concern has been reported.
- On occasion, we may receive safeguarding concerns from individuals outside of our Trust. In this instance, the person to whom the report is made must share the concern in line with processes outlined above. Safeguarding concerns received from external sources will be responded to in the same way as a concern being received from inside the academy.

### *Referral process*

- The Headteacher, members of school and REAch2 Senior Leadership Teams, including Deputy Directors of Education, and Chairs of Governors will know the name and contact details for the Local Authority Designated Officer (LADO), with whom contact will be made as soon as possible upon receipt of an allegation, and always within one working day.
- If further investigation or action is required, the person referring the concern to the LADO will then be nominated as the 'case manager'.
- In the event of a safeguarding concern being raised about an adult not directly employed by the academy, i.e., a supply teacher, the same process will be followed to contact the LADO. Additionally, the Headteacher will liaise with the individual's employer subsequent to the referral to ensure full cooperation and involvement with any process required to investigate and resolve the concern that has been raised.
- In the event of any referral to LADO being made about a Headteacher or a member of the central team, the REAch2 Head of Safeguarding will be immediately informed.

### *Information sharing*

- When directed to by the LADO, the case manager will inform the accused person of the allegation and will give as much information as possible about its nature. We have a duty of care to our employee/volunteer and will provide effective support to anyone in this situation, as well as ensuring that the matter is dealt with quickly, fairly and consistently.

- As directed by the LADO, the case manager will also tell the parents of the child or children involved of the allegation (if they are not already aware) and will keep them informed as to the progress and outcome of the process.

### *Managing the situation*

- As directed by the LADO, and in consultation with the REAch2 HR and/or safeguarding teams, we will assess the possible risk posed by the accused individual if they are to continue in their role. This assessment may result in suspension if the risk is considered sufficient and if all suitable alternative options have been considered.
- If an individual who is judged to be unsuitable to work with children resigns or their services cease to be used, we will assess the situation against the published DBS criteria, and, in the case of teachers, Teaching Regulation Agency criteria, and will follow up with a referral to either or both regulatory bodies where necessary. A compromise or settlement agreement will not be used in cases where this would prevent a referral to DBS being made, as to do so could result in a criminal offence and is non-compliant with our legal duty.
- One-off and/or repeated allegations of malicious, false, unfounded or unsubstantiated conduct will not be referred to in employer references.
- Where an allegation has been found to be malicious, we will consider whether to take further action, either via the Behaviour policy (in the case of a pupil) or via discussion with the Police (in the case of a parent or other adult)

### *Record keeping*

- Full details of each stage of the allegations process will be recorded in writing by the Case Manager. Please see the academy's safeguarding policy for a safeguarding concern chronology pro forma that can be used for this purpose, as required.
- Where an allegation has been found to be malicious, i.e., the allegation is disproved and there has been a deliberate attempt to deceive, all details and records will be removed from the person's personnel file.
- For allegations found to be substantiated, false, unfounded or unsubstantiated, details of the allegation and the investigation process, including the outcome, will be kept as per the Disciplinary policy, but usually separately and confidentially to the person's personnel file, with a copy also provided to the person concerned.
- Records will be retained for a period of 10 years from the date of the allegation, or until the accused has reached pension age (if this is sooner)

### *Learning lessons*

- As soon as is practicable, all involved parties (including academy leaders, members of the Trust HR and/or safeguarding teams, and LGB/cluster board members and Trustees, as appropriate) will convene to review the facts of the case, reflect on any lessons to be learned, and implement any needed changes to policy and/or procedure. Where applicable, this will include reference to any feedback given by the LADO.