



Cabot  
Learning  
Federation

TEWKESBURY  
ACADEMY



## Safeguarding and Child Protection Policy

Date Adopted: 2024 Cabot Learning Federation

Implementation Date:

Review period: Annual.

Date of Next Review: 2025

## History of most recent policy changes

Version	Date	Page	Change	Origin of Change e.g., TU request, Change in legislation
V1.0	November 2012	Whole Document	Adoption by the Cabot Learning Federation and Implementation	Following consultation and development of a harmonised Employee Handbook
V2.0	27 June 2013	Whole Document	Legal Review	Following review of CLF Safeguarding practice
V3.0	19 June 2014	Whole Document	Legal Review	Following legislative changes
V3.1	8 Oct 2014	Page 8 (Section 6.1)	Addition of link to appropriate guidance	Request from Academy
V4.0	June 2015	Whole Document	Annual review of full document. Name changed to Safeguarding Policy (from Child Protection)	Update to reflect changes to legislative guidance and general review of formatting, content and layout and feedback from Academies.
V5.0	November 2015	Whole Document	Updated in light of Keeping Children Safe in Education and Prevent Duty	Update to reflect changes to legislative guidance and general review of formatting, content, and feedback from Academies.
V6.4	Nov 2016		Updated in light of Keeping Children Safe in Education	Update to reflect changes to legislative guidance and general review of formatting, content, and feedback from Academies.
V6.5	Dec 2016	Whole document	Updated formatting	
V7.0	Oct 2018	Whole document	Updated in light of Keeping Children Safe in Education	Update to reflect changes to legislative guidance.
V8.0	October 2019	Whole document – minimal changes	Updated in light of Keeping Children Safe in Education	Updated in light of Keeping Children Safe in Education
V9.0	August/ Sept 2020	Whole Document	Updated in light of Keeping Children Safe in Education 2020 release – 2.9.20	Updated to reflect changes to KCSIE July 2020

<b>V10</b>	Nov 2021	Whole document	Updated in light of Keeping Children Safe in Education 2021 release –	Updated to reflect changes to KCSIE July 2021
<b>V11</b>	2022	Whole Document	Updated in light of Keeping Children Safe in Education	Updated to reflect changes to KCSIE July 2022
<b>V12</b>	Sept 2023	Whole Document	Updated in light of Keeping Children Safe in Education	Updated to reflect Keeping Children Safe in Education 2023
<b>V13</b>	Sept 2024	Whole Document	Updated in light of Keeping Children Safe in Education	Updated to reflect Keeping Children Safe in Education 2024

### Equality Impact Screening

Date of screening: September 2024						
Name of person completing screening: SW/BG						
	Does this policy have the potential to impact on people in any of the identified groups?		What is the expected impact of this policy on any of the identified groups			Notes
	Yes	No	Positive	Neutral	Negative	
<b>Age</b>	x		x			
<b>Disability</b>	x		x			
<b>Gender Reassignment</b>	x		x			
<b>Race or Ethnicity</b>	x		x			
<b>Religion or Belief</b>	x		x			
<b>Marriage</b>	x		x			
<b>Pregnancy/ Maternity</b>	x		x			
<b>Sex</b>	x		x			
<b>Sexual Orientation</b>	x		x			
<b>Carers / in-care</b>	x		x			
Should the policy have a Full Equalities Impact Assessment? <b>Yes</b> / No (please detail reasons below)						
<p>People across all identified groups have the potential to be impacted by the CLF Safeguarding policy and systems.</p> <p>By ensuring robust and consistently high-quality safeguarding policies and systems, in line with legislation and best practice, across the CLF, the impact is positive for all groups, as issues are less likely to be missed or dismissed by poor understanding, practice or bias.</p> <p>Across the trust, further work on Equalities Impact Assessments including training and professional development will be an area of focus through the CLF Equality, Diversity, and Inclusion developments.</p>						

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## Introduction

### At Tewkesbury Academy

- Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children, their families and carers, has a role to play.
- In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should always consider what is in the **best interests** of the child.
- We take an '**it can happen here**' approach where safeguarding is concerned.
- **Everyone** who comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action.
- Victims of harm 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.

### Tewkesbury Academy

is committed to safeguarding and promoting the welfare of children by:

- The provision of a safe environment in which children and young people can learn.
- Acting on concerns about a child's welfare immediately.
- Fulfilling our legal responsibilities to identify children who may need early help or who are suffering, or are likely to suffer, significant harm.
- Ensuring children are supported effectively including learners who may have intersecting protected characteristics. Tewkesbury Academy recognises those with protected characteristics may be more likely to be more vulnerable to negative experiences of discrimination both explicitly and or systemically.
- Tewkesbury Academy will work in the **best interests of the child** in compliance with their equality and human rights legal duties.

All action taken by Tewkesbury Academy will be in accordance with:

- **Current legislation:**
- **Statutory guidance:**
  - **Working Together to Safeguard Children 2023**, which sets out the multiagency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.
  - **Keeping Children Safe in Education (2024)** is statutory guidance issued by the Department for Education which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
  - **The Teacher Standards 2012** state that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Key documentation, procedures and guidelines are detailed in Appendix 9

**This policy should be read in conjunction with the following policies:**

- CLF Reasonable Restraint Policy
- Recruitment and Selection
- Whistleblowing and Public Interest Disclosure
- Code of Conduct for Staff
- Anti-Bullying
- Behaviour
- GDPR
- E-Safety
- CLF Low Level Concerns Guidance
- Policy on Supporting Children in Care
- Attendance, including the safeguarding response to children who go missing.

**Equalities Statement**

With regards to safeguarding we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#). General duties include:

1. Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
3. Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under Tewkesbury Academy's equality statement and measurable objectives. **These are available on our website to view and are reviewed on an annual basis or sooner if required. The action plans are live documents that guide provision and practice.**

We adhere to appropriate local authorities Equality Charter and Children's Charter (Academies add links to LA documents here)

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policy



Tewkesbury Academy also adheres to the principals of and promotes anti-oppressive practice in line of the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

## Definitions

‘Safeguarding’ is what we do for everyone in the Cabot Learning Federation (pupils, staff, visitors, Councillors, Directors, parents/carers etc.) to ensure that they feel safe, and to try to prevent abuse taking place.

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether that is within or outside the home, including online.
- preventing impairment of children’s mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the child.
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the [Childrens Social Care National Framework](#).

Child Protection (CP) is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect specific children (under 18) who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online. Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families’ lives.

‘Adults at Risk’ or ‘Vulnerable Adults’ are also protected against abuse by legislation. They are defined as those ‘aged 18 years or over who are, or maybe, in need of community care services by reason of mental or other disability, age or illness or who are unable to care for themselves, or unable to protect themselves against significant harm or exploitation’. This may include adults with learning difficulties, mental health issues, physical impairments or drug and alcohol misuse.

We may have ‘Vulnerable Adults’ in our Academies or community as parents/carers, siblings, visitors etc., and all of the principles and reporting procedures relating to Child Protection also apply to this group.

## Policy Statement

This Policy has been reviewed, authorised, and adopted by the Cabot Learning Federation Trust Board. It applies to all members of staff, Directors, Councillors, volunteers, pupils, and visitors in our Academies. It also applies wherever staff or volunteers are working with pupils away from the Federation, for example, at an activity centre or on an educational visit. This Policy will be shared in full with staff. It will be made available to parents/carers on request and can be produced in larger print or other more accessible formats if required. It will be published on the Federation's website. Each Academy in the Cabot Learning Federation will adopt the Policy, having adapted the procedures and other appendices to suit their setting, and will publish it on their website. They will ensure that is made available, in creative ways that are more accessible to all pupils, parents/carers and visitors. It is the belief of the Federation that every pupil should feel safe and protected from any form of abuse which, in this Policy, means:

- any kind of physical, sexual, or emotional abuse,
- domestic violence,
- sexual exploitation,
- female genital mutilation,
- child-on-child abuse
- radicalisation into violent extremism,
- neglect,
- discrimination,
- financial abuse,
- Institutional abuse.

The aim of the Policy is to ensure that:

- The Federation and all its Academies protect all their pupils, in every way possible, from any form of abuse, whether from an adult or another pupil.
- All adults, children and young people are aware of, and alert to, signs of abuse, both within the Federation and from outside, and are able to deal appropriately with every suspicion, disclosure or complaint.
- Any child or young person who may have been abused, is appropriately supported in accordance with his/her agreed Child Protection Plan.
- Academies are aware of any additional needs (including medical needs) of their children and young people and are particularly vigilant in supporting those who they deem to be vulnerable to abuse.
- All Academies operate robust and sensible health and safety procedures, have clear and supportive policies on drugs, alcohol, and substance misuse, and take all practicable steps to ensure that Federation premises are as secure as circumstances permit.

- All Academies have policies and procedures for supporting and monitoring Children in Care and reporting on their progress to their Council.
- Academies are able to consider and develop procedures to deal with any safeguarding issues which may be specific to individual children in our Federation or in our local area.
- Every complaint or suspicion of abuse from within or outside the Federation is taken seriously and in all proper circumstances is referred promptly to appropriate external agencies such as the Children's Social Care Department of the Local Authority (CSC), the Child Protection Unit of the Police (CPU) or the NSPCC.
- Where an allegation of abuse is made against a member of staff or a volunteer, the matter is referred to the Local Authority Designated Officer (LADO) relevant to the area in which the individual Academy is based. Contact details relevant to each Academy are given at Appendix 8.

The Cabot Learning Federation (Federation) is committed to preventative work to safeguard children and young people and to promote their welfare and expects all staff and volunteers to share this commitment. This will include:

- Ensuring all pupils are aware of who they can talk to if they do not feel safe or have a safeguarding concern.
- Providing clear lines of communication for all pupils to trusted adults.
- Creating an atmosphere in each Academy where all pupils feel safe and valued, and where they believe that they will be listened to and supported.
- Regularly raising awareness of safeguarding issues with staff, Directors, Councillors, and volunteers, ensuring they have regular training and briefings on any changes to legislation or accepted best practice.
- Ensuring that all Academies have Online Safety policies in place and that staff and pupils are aware of how to keep themselves safe on-line.
- Ensuring that all pupils, staff, Directors, Councillors, visitors, and volunteers are aware of their responsibility in terms of safeguarding and know how to raise safeguarding concerns in the Academy, and how to report and deal with any allegations of abuse.
- Ensuring that appropriate aspects of safeguarding are included in the curriculum for pupils of all ages (usually through PSHE or SRE sessions) and are covered in the induction process for all pupils.
- Supporting pupils' development in ways that foster their independence, confidence, self-esteem, and security.
- Developing robust processes for identifying, supporting, and monitoring those pupils who may be vulnerable to, or at risk of, abuse.

- Developing effective working relationships with other agencies involved in protecting children and young people e.g., the Police, Local Authority Social Care, Health, and voluntary agencies such as the NSPCC.

In relation to staffing and human resources, the Federation will also take all reasonable measures to:

- Ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the DfE guidance given in *Keeping Children Safe in Education 2024* and the *Education (Independent School Standards) (England) Regulations 2019*.
- Ensure that we carry out all necessary checks on the suitability of people who serve on the Federation's Board of Directors and Local Councils in accordance with the above regulations and guidance.
- Ensure that where the Federation ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a referral is made to the Disclosure and Barring Service as soon as possible if the criteria are met.
- Ensure that Academies design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations.
- Ensure that where staff from another organisation are working with our pupils on another site, the organisation adopts and implements the measures contained in the DfE guidance *Keeping Children Safe in Education (2024)* and that they carry out appropriate child protection checks and procedures.
- Follow the local inter-agency procedures of the Local Safeguarding Children Board(s) that relate to the Academies within the Cabot Learning Federation.
- The CLF has implemented the use of an electronic Safeguarding monitoring service (CPOMS) for recording all incidents and concerns of Safeguarding. All paper files prior to this will be kept securely as required by legislation. More information on CPOMS can be found in Appendix 7.

### **Safer Recruitment and Selection**

The Federation pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' (2024; Part 3) including scrutinising applicants, this will include social media checks on successful applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks, dependent on the role and duties performed, including regulated and non-regulated activity (see KCSIE 2024). All recruitment materials will include reference to the Cabot Learning Federation's commitment to safeguarding and promoting the wellbeing of pupils. The Cabot Learning Federation will undertake a risk assessment and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity.

## The Designated Safeguarding Leads

Each Academy will appoint a member of their Senior Leadership Team with the necessary status and authority to be the **Designated Safeguarding Lead or Deputy Designated Safeguarding Lead** to be responsible for matters relating to child protection and welfare who will attend senior leadership meetings to report on, plan and help implement Safeguarding across the Academy.

Each Academy will also appoint a Deputy Designated Safeguarding Lead who will carry out this role when the Designated Safeguarding Lead is unavailable. The name and contact details of the Designated Safeguarding Lead and the Deputy are given in Appendix 4.

Each Academy will also have a nominated Councillor who is designated as the Council's lead on safeguarding, who will undertake appropriate training. They will ensure that the Councillors are aware of their safeguarding duties and that the Council receives annual reports and monitors the Academy's policy implementation.

The Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead will undertake appropriate safeguarding training in single and inter-agency working and will attend refresher training at least at two yearly intervals, or more often if deemed appropriate. They will also be required to attend briefing and training on any safeguarding issues that are of particular concern locally, or on any changes to legislation.

The Designated Safeguarding Lead will be responsible for monitoring the use of CPOMS. They will ensure that all staff get appropriate training on how to record incidents and that staff who have full access understand their responsibilities.

The Designated Safeguarding Lead or a Deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the Designated Safeguarding Lead (or Deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or Deputy) as soon as is practically possible.

The Designated Safeguarding Lead role can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out below, remains with the Designated Safeguarding Lead; this lead responsibility cannot not be delegated.

The Designated Safeguarding Lead and any deputies should liaise with the three Local Authority Safeguarding partners and other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help Designated Safeguarding Leads understand when they should consider calling the police and what to expect when they do.

Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and academy leadership staff. Their role could include ensuring that the academy, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

When there has been a report of sexual violence, the Designated Safeguarding Lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The main responsibilities of the Designated Safeguarding Leads are:

- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- To take responsibility for the implementation of this Policy in their Academy, and to co-ordinate the Child Protection and Vulnerable Adult procedures, including implementation, regular review and updating and working with the Directors as necessary.
- Managing referrals to other agencies including: the local authority children’s social care in cases of suspected abuse; Police Southwest Counter Terrorism Unit where there is a radicalisation concern; the Disclosure and Barring Service in cases where a person is dismissed or left due to risk/harm to a child and the Police in cases where a crime may have been committed in relation to safeguarding. The DSL will also support and advise other staff in making referrals to other agencies.
- Undertake training to ensure that they (and any deputies) have the knowledge and skills required to carry out the role (updated every 2 years). Further knowledge and skills should be updated at regular intervals and shared with relevant parties as appropriate.
- Meet regularly with their Principal (minimum x 6 per year), including documenting and capturing a record of the discussions as suitable.
- Complete an Academy Safeguarding report to be sent to the CLF Designated Safeguarding Lead Officer – termly using the shared templates and documentation.
- To undertake the roles and responsibilities of this position as set out by Keeping Children Safe in Education (2024).
- Ensure that Online Safety is adequately covered within the curriculum.
- Take responsibility for overseeing and acting upon filtering and monitoring reports and annual checks to the filtering and monitoring system.
- Help promote educational outcomes by sharing information about vulnerable learners including those that have and have previously had social workers with relevant staff. This includes ensuring that staff:
  - know who these children are,
  - understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
  - Are supported to identify the challenges that children in this group might face.
  - Provide additional academic support or make reasonable adjustments to help children who have **or have had** a social worker to reach their potential.
- To ensure that all staff and volunteers in their Academy receive regular training and briefings and are kept up to date with safeguarding issues locally and nationally, and to keep records of this training.
- Analyse safeguarding data every term to identify academy specific concerns and provide training and awareness to staff and students of these issues.
- Provide the CLF Safeguarding newsletter to all staff.

- Work with the Principal to ensure that all staff complete regular CLF Safeguarding Professional Development in the form of Newsletters, reading, quizzes and other learning when it is released throughout the year.
- To ensure that all staff are aware of their legal duty to report safeguarding concerns to Children's or Adults' Social Care or the Police, including concerns about pupils at risk of, or who have had, Female Genital Mutilation or are considered to be at risk of radicalisation or Child Sexual Exploitation.
- To link with the Local Authority Safeguarding Partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- To carry out an annual audit of safeguarding practice in the Academy (as required by the Local Authority) and to provide an annual report on safeguarding to the Council and Federation.
- To ensure that Councillors have been briefed or trained on this Policy and the Academy's safeguarding procedure.
- To keep the principal informed of all actions, unless the principal is the subject of a complaint. (In this situation, the Designated Safeguarding Lead should consult with the Chair of the Federation Trust Board or, in their absence, the Vice Chair of the Federation Trust Board, named in Appendix 4).
- To oversee the referral and monitoring of cases of suspected or alleged abuse to the Children's or Adults' Social Care Department or the Police (using the agreed Multi-Agency Referral Form).
- To ensure that a proper and confidential record is maintained of any Child Protection or Vulnerable Adult referral, safeguarding complaints, or concerns (even when this does not lead to a referral).
- To ensure that all such records are kept confidentially and securely until the child's 25<sup>th</sup> birthday and that they are separate from other Academy records.
- Ensure that they or a member of the Safeguarding team attend the CLF DSLO meetings every term.
- To ensure that all key stakeholders (parents/carers, staff, pupils, Directors, Councillors, and visitors) are aware of this Policy and relevant procedures, and that they are available on the Academy website and in accessible formats as appropriate.
- To liaise with Children's and Adult's Social Care, the local Safeguarding Children Board, the Police, and other agencies on safeguarding issues on behalf of the Academy / Federation.
- To act as a source of support, advice, and expertise within the Academy, including advising on whether to make a referral.
- To be the first point of contact for parents/carers, pupils, teaching and non-teaching staff and external agencies in all matters of Child Protection, Vulnerable Adults, and safeguarding.
- Refer cases to the Avon and Somerset Constabulary Southwest Counter Terrorism Unit where there is a radicalisation concern as required.
- Liaise with the Principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- To ensure that pupils on a Child Protection Plan or who are deemed to be at risk are monitored, ensuring that records are maintained and updated as notification is received, and that relevant staff attend any case conferences or multi-agency planning meetings and

contribute to assessments etc. as required, ensuring that parent/carers and pupils are kept informed as appropriate.

- To ensure that any pupil on a Child Protection Plan, or about whom there are safeguarding concerns, who is absent for more than two days is reported to Children's Social Care where required.
- To ensure that the Academy has a policy for supporting Children in Care and that there is a named person designated to lead this work.
- Support Academy staff to work with external agencies.
- To ensure that any employers, training providers or alternative education providers receiving pupils on placements or courses have appropriate safeguarding policies and procedures in place.
- In relation to allegations against staff, to liaise with the Local Authority Designated Officer (LADO), the local Children's Social Care service and other external agencies as and when appropriate, including the Police and the Disclosure and Barring Service.
- To ensure that where a child leaves the Academy, Children's Social Care are informed in writing, and that their Child Protection file is copied for the new school, college or training provider, following the relevant local authority guidance and confidentiality procedures, and transfer it separately from the main pupil file.
- Ensure the successful transfer of the Safeguarding/Child Protection File when a learner moves on to a new setting within 5 days for in year transfer or the first 5 days of the start of a new term.
- If Early Help is appropriate support staff members liaising with other agencies and setting up an inter-agency assessment as appropriate.
- Ensure that there is constant review and communication with children's social care if the child's welfare is still a concern.
- Complete CLF Safeguarding data requests including end of term reports, safeguarding overview spreadsheet, CLF Vulnerable list and CLF strategic meeting agenda.

#### **The CLF Designated Safeguarding Lead Officer and Deputy Lead Officer**

- To work with Principals and Designated Safeguarding Leads in the application of effective safeguarding within their academies in accordance with legislation and national and local policy.
- Work alongside the SLT and teaching teams to develop an effective and proactive culture of safeguarding across the Academy, including links to Online Safety, Relationship, health, and sex education and PSHE.
- Guide and support academies on improving safeguarding practice, bring together expertise from different academies and support capacity building and training.
- Maintain an overview of practice and training requirements across academies.
- Provide clear professional consultancy and expertise in relation to any safeguarding matters to all Designated Safeguarding Leads and other relevant staff.



- Model and promote partnership with key agencies ensuring collaboration, information sharing and integrated planning for the benefit of the child.
- Organise and facilitate a safeguarding meeting every term for all academy Designated Safeguarding Leads.
- To monitor and support the use of CPOMS across the Federation.
- Provide support and guidance to academies where an allegation against a member of staff has been made with a specific focus on the welfare of the child or young person.
- Ensure robust, appropriate mechanisms for information sharing between academies and other external agencies are in place, particularly the Police and Social Care.
- Develop and nurture effective working relationships and communications across the CLF, ensuring all work in this area is compliant with relevant safeguarding legislation and local LSCB Procedures.
- Contribute to safeguarding reviews and updates of local procedures and policies ensuring they remain compliant with relevant national policy, legislation, and regulation, including equality and anti-discrimination legislation.
- Support Principals and Designated Safeguarding Leads to ensure every member of CLF staff has access to and understands the Federation’s Safeguarding Policy and Procedures.
- Collate, analyse, and report on confidential and sensitive data relating to safeguarding to identify issues, establish trends and ensure that standards and performance targets are met.
- Implement systems and processes to ensure compliance with mandatory training requirements.
  - Responsible for collecting, collating, and reporting findings from DSLO term reports to the CLF Strategic Lead and Federation Board.
  - Identify and organise Safeguarding training as required for academies.
  - Network with external agencies and providers.
- The Designated Safeguarding Officer and Deputy Designated Safeguarding Officer reports to the Executive Principal with responsibility for safeguarding.

## Role of the Board and Academy Council

Duties are further outlined in Keeping Children Safe in Education (2024).

There is a member of the CLF Board level lead who takes responsibility for the setting's safeguarding responsibility to ensure that safeguarding and child protection practice, process, and policy (including online safety) is effective and is compliant with legislation, statutory guidance, and Local Safeguarding Partnership arrangements.

As outlined in the Delegated Authority Framework, there will be a link Academy Councillor with responsibility for Safeguarding.

- The appointed Safeguarding Board Link member will work with the Central Safeguarding team to ensure that this policy document is updated annually (or when there are significant updates)
- The appointed Safeguarding Academy Councillor will liaise with the Principal and the DSL to produce an annual report for governors and complete the S. 175 (annual safeguarding) audit.
- The appointed Safeguarding Academy Councillor will liaise with the Principal and the DSL to monitor the safeguarding arrangements through the Termly Safeguarding reports and monitoring.
- Ensure that the school remedies any deficiencies or weaknesses brought to its attention without delay.
- Ensure that the DSL is an appropriate senior member of setting's senior/leadership team and ensure that they have adequate time, funding, training, resources, and support to carry out their role effectively.
- Ensure that the training and learning for the school community is robust and effective.
- Ensure that learners are taught about safeguarding on the curriculum including online safety in compliance with statutory guidance [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/relationships-and-sex-education-rse-and-health-education)
- To take strategic lead to ensure that Filtering and monitoring of ICT is meeting current standards as set out in, Meeting Digital and Technology Standards in schools and colleges <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>
- Ensure that appropriate staff are assigned roles and responsibilities to manage filtering and monitoring of systems.
- To ensure that teachers, including supply teachers, other staff, volunteers, and contractors have appropriate checks carried out in line with statutory guidance Keeping Children Safe in Education (2024).
- Ensure that there are procedures in place to manage safeguarding concerns or allegations against teachers, including supply teachers, other staff, volunteers, and contractors who may not be suitable to work with or pose a risk to learners, this includes having a process to manage low level concerns.
- Ensures the Equality Act is understood and followed, and statutory responsibilities are adhered to including the outlined responsibilities in relation to discrimination.
- Ensures the Prevent agenda is implemented and adhered to including the training requirements.

- Ensures Safer Recruitment arrangements and procedures are implemented and adhered to
- Ensure that systems are in place for learners to effectively share a concern about a safeguarding issue they are experiencing, express their views and give feedback.
- Ensure that the setting has systems in place to prevent, identify and respond to child-on-child harm (including sexual abuse and sexual harassment) and mental health concerns, and review the effectiveness of the setting's online safety practices.
- Appoint a designated teacher to promote the educational achievement for children in care and other care arrangements.

### **Identifying and monitoring the needs of vulnerable learners**

The DSL and Deputy DSL will regularly review and monitor those students who have been identified as vulnerable (The DSL or a member of the safeguarding team are required to complete and keep accurate the CLF Central Vulnerable List on a regular basis). This can include reviewing attendance data, behaviour data, attainment data and safeguarding records. This is to ensure that:

- Proportionate and early interventions can be taken to promote the safety and welfare of the child and prevent escalation of harm.
- Information about vulnerable learners is shared with teachers and school and college leadership staff to promote educational outcomes.
- Learners who currently have, or have had, a social worker will have their academic progress and attainment reviewed and additional academic support will be provided to help them reach their full potential.
- Reasonable adjustments are made in relation to school-based interventions – for example responding to behaviour.

### **Multi-agency working**

Tewkesbury Academy is a relevant agency in their Local Authority Safeguarding Partnership and will work together with appropriate agencies to safeguard and promote the welfare of children including identifying and responding to their needs. This is in compliance with statutory guidance [Working Together to Safeguard Children 2023](#).

#### Occasions that warrant a statutory assessment under the Children Act 1989:

- If the child is in need under s.17 of the Children Act 1989 (including when a child is a young carer and or subject to a private fostering arrangement).
- Or if the child needs protection under s.47 of the Children Act 1989 where they are experiencing significant harm, or likely to experience significant harm.

Referrals in these cases should be made by the DSL (or Deputy DSLs) to Children's Social Care in the local authority in which that child resides

Where the child already has a social worker, the request for service should go immediately to the social worker involved or, in their absence, to their team manager. If the child is a child in care, notification should also be made to [The Virtual School](#).

Tewkesbury Academy will co-operate with any statutory safeguarding assessments conducted by children's social care: this includes ensuring representation at appropriate inter-agency meetings such as integrated support plan meetings initial and review child protection conferences and core group meetings.

Additional considerations:

- Where a learner and/or their family is subject to an inter-agency child protection plan or a multiagency risk assessment conference (MARAC) meeting, the setting will contribute to the preparation, implementation, and review of the plan as appropriate.
- In situations where a child in care may be put on to part time timetable, the school will consult with The Virtual School following local procedures.
- If a crime has been suspected or committed that involved the bringing of an offensive weapon on to the school site, the setting will liaise with the appropriate Local Authority Violence Reduction Unit (e.g., Bristol-Safer Options) who will consider a proportionate response.
- If there is a risk of harm, the police should be called via 999. For other concerns of criminality, the non-statutory guidance 'When to Call the Police' from the NCPCC can be helpful or contact the local PCSO/School Police Beat Officer/School Officer.
- In the rare event that a child death occurs, or a child is seriously harmed, Tewkesbury Academy will notify the appropriate Local Authority Safeguarding Partnership as soon as is reasonably possible.

**Safeguarding in the curriculum**

Tewkesbury Academy is dedicated to ensuring that learners are taught about safeguarding, including online safety. We recognise that a one size fits all approach may not be appropriate for all learners, and a more personalised or contextualised approach for more vulnerable learners, victims of abuse and some SEND children might be needed. This is part of a broad and balanced curriculum.

This includes:

- Working within statutory guidance in respect to [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](#); and [Early years foundation stage \(EYFS\) statutory framework - GOV.UK \(www.gov.uk\)](#)
- Personal, Social, Health and Economic (PSHE) education, to explore key areas such as self-esteem, emotional literacy, assertiveness, power, building resilience to radicalisation, discrimination, e-safety and bullying.
- Appropriate filters and monitoring systems are in place to ensure that 'over-blocking' does not lead to unreasonable restrictions as to what learners can be taught about online teaching and safeguarding.
- The curriculum will be shaped to respond to safeguarding incident patterns in the setting identified by the Designated Safeguarding Lead and safeguarding team (e.g., to respond to an increase in bullying incidents).
- Providing engagement opportunities with parents and carers to consult on key aspects of the curriculum.

- Learners are supported to have a strong voice and are able to contribute via strong mechanisms for feedback – including the opportunity to inform the curriculum via discussions with the [school council and student body – Academies to add in Pupil Voice structure/reference.

### **Types of Abuse**

The Department for Education’s Tackle Child Abuse campaign has accessible videos to watch <https://tacklechildabuse.campaign.gov.uk/>

Abuse, neglect and exploitation.

All staff should be aware of the indicators of abuse, neglect, and exploitation, 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.

All school and college staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap. For children with Special Educational Needs and Disabilities (SEND) additional barriers can exist when identifying abuse and neglect, these include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration.
- being more prone to peer group isolation than other children.
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges CLF Academies and Provisions will consider extra pastoral support for children with SEND in accordance with KCSIE, 2024.

The following are the definition of abuse and neglect as set out in Working Together to Safeguard Children (2023) however, the ultimate responsibility to assess and define the type of abuse a child or young person may be subject to is that of the Police and Children's Services – our responsibility is to understand what each category of abuse is and how this can impact on the welfare and development of our children and where we have concerns that a child or young person may be at risk of abuse, neglect and/or exploitation (one or more categories can apply) to take appropriate action as early as possible.

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

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

However, the Case 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 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 who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

**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.

**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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

### **Safeguarding issues**

All staff should 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. Below are some safeguarding issues all staff should be aware of. Additional information on these safeguarding issues and information on other safeguarding issues is included in Appendix 9.

### **Child-on-child abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse').
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).

- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- 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.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as way of initiating a person into a group and may also include an online element).

#### At Tewkesbury Academy

- We have a 'zero tolerance' approach to abuse. Incidents are taken seriously. These will never be tolerated or passed off as 'banter,' just having a laugh' or 'part of growing up.' Banter and teasing can and should be acknowledged and recognised as bullying behaviour and may require proportionate intervention.
- Even with a zero-tolerance approach, we take steps to educate and take action ensure to mitigate the risk of contributing to a culture of unacceptable behaviours or a culture that normalises abuse.
- It is understood that child-on-child abuse harm may reflect equality issues in terms of those who may be targeted are more likely to have protected characteristics.
- Early identification of vulnerability to child-on-child harm is made by reviewing attendance, behaviour, attainment, and safeguarding records.

There are clear systems in place (which are well promoted, easily understood and easily accessible) for learners to confidently report abuse knowing their concerns will be treated easily.

Tewkesbury Academy will handle initial reports of harm by:

- Securing the immediate safety of learners involved in an incident and sourcing support for other young people affected.
- listening carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be processed and progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was
- All victims will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment nor ever be made to feel



ashamed for making a report. We will explain that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way that avoids alarming or distressing them.

- Ensuring the child's wishes are taken into consideration in any intervention and any action is taken to ensure safety of the target and other members of the wider peer cohort.
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or deputy) or local authority children's social care) to discuss next steps. We will only share the report with those people who are necessary in order to progress it. We will ensure that the victim understands what the next steps will be and who the report will be passed to.

### **Actions to take in relation to sexual violence and sexual harassment.**

Reference to Keeping Children Safe in Education (2024) should be made in relation to taking protective action.

Tewkesbury Academy will take the following considerations and actions when responding to incidents of sexual violence and sexual harassment:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident, and well-known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff.
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The victim may ask the school or college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the

public task basis may apply, where the overall purpose is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.

- Incidents will be reported immediately to the DSL/ Deputy DSL who will undertake further assessment of what action should be taken proportionate to the factors that have been identified. [The Brook - Sexual Behaviours Traffic Light Assessment Tool](#) should be utilised to inform assessment of risk and what actions to subsequently take. This may include seeking specialist advice and guidance from external agencies including [Be Safe](#).
- DSLs/Deputies will take proportionate action and consider whether a case can be managed internally, through early help, or should involve other agencies as required in line with the section Multi-Agency Working.
- When an incident involves an act of sexual violence (rape, assault by penetration, or sexual assault) the starting point is that this should be passed on to police regardless of the age of criminal responsibility (10 years old). This must be reported directly via 101 for recording purposes and accountability. This is on the understanding that the police will take a welfarist approach rather than a criminal justice one. A concurrent referral to social care must also be made. A strategy can be requested where education can voice explicitly concerns of criminalisation in a multi-agency context.
- When the children involved require a statutory assessment either under s.17 or s. 47 of the Children Act 1989 a referral to social care should be undertaken.
- Where the report includes an online element, the setting will follow [Searching, screening and confiscation at school - GOV.UK \(www.gov.uk\)](#) and [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.
- CLF Contextual Safety Plans and relevant Risk assessments will be developed for individual children who have been involved in an incident. This should be reviewed every 3 months or every time there is an occurrence of an incident. These should involve the child and parents/carers and address contextual risks.

### **Extra Familial Harm**

- Extra-familial abuse is linked to ‘contextual safeguarding’ or ‘complex safeguarding’. These concepts refer to harm that occurs to children outside of their family system, often during the adolescent years because at this age their social networks widen. These networks can have a significant influence over an adolescent’s understanding of social norms. A large proportion of child exploitation takes place in public spaces (parks, stairwells, high streets etc.) so it is these locations that often require a professional response to safeguard young people from exploitation rather than solely focusing on the child and their family.
- Parents should be partners in safeguarding children and young people from child exploitation. Parents can often feel like secondary victims to exploitation as they try to safeguard their children and young people from extra-familial harm. Child exploitation can adversely affect parent-child relationships and parents may feel under scrutiny by professionals.

- Children experiencing exploitation and trauma may direct physical aggression towards their parents and siblings, creating further strain in family relationships. Parents/carers can also feel a sense of guilt and shame that their child has been exploited, they may also feel physically threatened by perpetrators and concerned about their family's safety.

#### **Contextual safeguarding approach to child-on-child harm:**

- Tewkesbury Academy will minimise the risk of child-on-child abuse by taking a contextual approach to safeguarding by increasing safety in the contexts of which harm can occur – this can include the school environment itself, peer groups and the neighbourhood.
- Following any incidents of child-on-child harm, the DSL/Deputies will review and consider whether any practice or environmental changes can be made in relation to any lessons learned. This can include making changes to staffing and supervision, making changes to the physical environment and considering the utilisation and delivery of safeguarding topics on the curriculum.

#### **Reporting to the Police**

- Any report to the police will generally be in parallel with a referral to children's social care.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police.
- At this stage, we will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, the academy will continue to support the child in any decision they take. This will be with the support of children's social care and any appropriate specialist agencies. support the child in any decision they take. This will be with the support of children's social care and any appropriate specialist agencies.
- Where a report has been made to the police, the academy will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers, as well as discussing the best way to protect the victim and their anonymity.
- In some cases, it may become clear very quickly, that the police (for whatever reason) will not take further action. In such circumstances, the academy will continue to engage with specialist support for the victim as required.
- Whatever the response, The CLF and its academies believe that sexual violence and sexual harassment is never acceptable and will not be tolerated.

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

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

### **Child Criminal Exploitation (CCE)**

- Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### **Child Sexual Exploitation (CSE)**

- CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
- CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.
- CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

### **Serious violence**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, 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.

## Female Genital Mutilation (FGM)

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

## Mental health and wellbeing

- Schools and colleges have an important role to play in supporting the mental health and wellbeing of their learners. Mental health needs can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and or may require early help support.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, and they should speak to the designated safeguarding lead or a deputy.

Tewkesbury Academy will commit to undertake the following:

- The appointment of a senior mental health lead who can support the development of knowledge and act as a point of expertise to promote the wellbeing and mental health of learners. This colleague will have sufficient training in mental health and safeguarding for them to carry out their role effectively.
- Early identification of vulnerability to mental health problems by reviewing attendance, behaviour, attainment, and safeguarding records.
- Ensure that learners can report and share concerns.
- Staff will follow a safeguarding process in terms of reporting concerns so the DSL/Deputy DSLs (and wider members of the safeguarding team such as the SENDCo) can assess whether there are any other vulnerabilities can be identified and proportionate support considered.
- Staff will ensure the immediate health and safety of a learner who is displaying acute mental health distress. This may require support from emergency services via 999 if the learner is at risk of immediate harm.
- DSLs/Deputies will consider whether a case can be managed internally, through early help, or should involve other agencies as required in line with section - Multi-Agency Working.
- The setting will communicate and work with the learner and parents/carers to ensure that interventions are in the best interests of the child.
- DSLs will liaise with staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem – DSLs and the senior leadership team should be able to access specialist

advice through targeted services or through their locality Primary Mental Health Specialists from Child and Family Consultation Services.

### **Contextual safeguarding approach to mental health**

Tewkesbury Academy will ensure that preventative measures in terms of providing safeguarding on the curriculum will provide opportunities for learners to identify when they may need help, and to develop resilience.

The setting will take a 'whole school approach' to:

- deliver high quality teaching around mental health and wellbeing on the curriculum.
- having a culture that promotes mental health and wellbeing.
- having an environment that promotes mental health and wellbeing.
- making sure pupils and staff are aware of and able to access a range of mental health services.
- supporting staff wellbeing
- And being committed to pupil and parent participation

### **Other forms of abuse which need to be reported and may particularly relate to Vulnerable Adults:**

- **Domestic abuse** can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- **Financial or material abuse:** this involves the theft or misuse of a child or vulnerable adult's money (e.g., child or disability benefits), fraud or extortion.
- **Discrimination or harassment:** if based on someone's characteristics that are protected by the Equality Act (e.g., gender, race, sexual orientation, disability, religion, or belief) this can, in some situations, be considered to be abuse or hate crime.
- **Institutional abuse:** where an institution (such as an Academy) has policies or practices that deny children or vulnerable adults their dignity or assert power and create a climate where the forms of abuse listed above are allowed to continue without challenge.

### **Safeguarding and Attendance**

As outlined in the academy's attendance policy, the academy will monitor trends and patterns of absence for all pupils as a part of its standard procedures. However, it is recognised that sudden or gradual changes in a pupil's attendance may indicate additional or more extreme safeguarding issues. In line with government guidance Keeping Children Safe in Education, local procedures and the academy's Safeguarding Policy, staff will investigate and report any suspected safeguarding cases on to the relevant authorities. As part of the academy's safeguarding duty and standard procedures, staff will inform the local authority and/or the police of the details of any pupil who is absent from school when they cannot establish their whereabouts and are concerned for the pupil's welfare.

Schools have a safeguarding duty to keep in regular contact with all pupils, whether they are currently attending or not. The frequency and type of contact will depend on each case. The CLF has adopted a strategy in line with serious case reviews and their own academy's safeguarding and attendance processes and will conduct home visits to see and speak to students who are not attending to ensure that they are safe and are accessing the support that they require. Where considered appropriate by the DSL/Safeguarding Team, the pupil should also have an Individual Risk Assessment. It is important that the pupil and parent are seen and spoken to on each visit, as this will help school staff to establish whether they are safe and well, or if there are any safeguarding concerns that require follow up action. . If staff are unable to see and speak to the pupil and parents/carers, they may contact the pupil's emergency contacts and/or other professionals or contacts of the family, who they reasonably expect may be able to provide the academy with relevant information.

If a pupil is not attending and the academy is unable to establish the reason for absence, or confirm the pupil's whereabouts, or is concerned for the welfare of the pupil, the academy will take appropriate action which will depend on the circumstances of each case. This could include, but is not limited to:

- contacting the pupil's emergency contacts, or other contacts of the family who the academy reasonably expect may be able to provide information,
- contacting siblings' schools,
- contacting other professionals,
- home visits to the family address,
- making enquiries with neighbours,
- requesting welfare checks from the police,
- making referrals to children's social care.

If a pupil has a social worker and/or youth offending team worker the academy will inform the relevant worker/s if a pupil has unexplained absences from school.

The academy can refer to the CLF attendance guidance for further information.

### **Children Missing Education (to be read in conjunction with attendance policy)**

As outlined in the academy's attendance policy, if the academy has reason to believe the pupil may no longer be living at the address held on record and staff are unable to confirm the whereabouts of the pupil through the academy's usual processes, staff will follow the CLF CME and Pupil Tracking guidance.

If a parent/carer notifies the academy in writing that the pupil and family are moving out of the area and the pupil no longer requires a place, the academy will follow the CLF attendance guidance.

The academy will seek advice from the Local Authority CME team if unsure about any individual cases.

## **Suspensions**

Parents/carers must be made aware of their responsibilities when a student's is placed on a Fixed Term Exclusion to ensure that they are kept safe. Academies should be aware of what provision is going to be implemented by parents/carers. Where the Academy may have concerns about a family, referrals to appropriate agencies (First Response, First Point etc.) should be made, especially if no contact can be made whilst the student is on a fixed term exclusion.

The academy will notify the parents/carers of the suspension. If the pupil is a child in care, the academy will notify the pupil's carer, social worker and the local authority's virtual school. In other instances, where a pupil is open to children's social care for any reason, the academy will also inform the pupil's allocated social worker.

If the academy decides to send a pupil home for a fixed period due to their behaviour, this will be recorded as a suspension. The academy will follow the DfE's current statutory guidance on suspensions and permanent exclusions.

Any suspension must be agreed by the Principal.

The academy will notify the parents/carers of the suspension. If the pupil is a child in care, the academy will notify the pupil's carer, social worker, and the local authority's virtual school. In other instances, where a pupil is open to children's social care for any reason, the academy will also inform the pupil's allocated social worker.

The pupil must be collected from the academy office by the parent/carer or another authorised adult and signed out in the 'signing out' book. No pupil will be allowed to leave the academy site without parent/carer confirmation.

## **Elective Home Education**

As outlined in the CLF attendance guidance, the academy will notify the Local Authority of every pupil where a parent has exercised their right to educate their child at home in accordance with the LA's EHE guidance.

A pupil must not be removed from roll due to Elective Home Education (EHE) without a written notification from the parent making it clear the parent is taking responsibility for educating their child at home, rather than sending them to school. This is a legal requirement.

Pupils must not be removed from roll for EHE without the knowledge of the Principal, who will also liaise with their Executive Principal. A school cannot refuse to allow a parent to EHE, but it is important that the principal is made aware of any decisions and that the school responds as supportively as possible, including checking again with parent that the parent (and child, where appropriate) understand the implications of the decision.

The school DSL/safeguarding team should be informed of all pupils whose parent wishes to remove their child from roll for EHE. They will consider any other information they may have about the pupil and should provide any relevant safeguarding information which the school should share with the Local Authority EHE team. The DSL/ safeguarding team will also be able to advise and lead on any additional safeguarding action that may be needed. The child's Safeguarding File/CPOMS records should also be securely shared with the Local Authority.

When removing a pupil from roll due to EHE, the school must select the right option on the academy's MIS for the reason for removal from roll. This is how the Local Authority can cross



reference the pupils who have been deregistered from schools, due to EHE, with the Local Authority notification forms that schools complete. It also means the CLF Data Team can monitor how many CLF pupils are going to EHE.

Special schools only: If a child is registered at a special school, the school cannot remove the child from roll without the consent of the Local Authority (SEND Department) or the Secretary of State.

Academies will also aim to cover these areas in their training programmes, and to make staff aware that there is also guidance on all these areas on their local Safeguarding Children's Board website.

More information on Specific Safeguarding issues can be found in Appendix 9:

- Bullying, including cyberbullying.
- Domestic violence.
- FGM.
- County Lines.
- Child sex exploitation.
- Child-on-Child abuse.
- Drugs.
- Fabricated or induced illness.
- Faith abuse.
- Gangs and youth violence.
- Gender-based violence/violence against women and girls (VAWG).
- Mental health.
- Private fostering.
- Preventing radicalisation.
- Sexting.
- Abuse in intimate personal relationships (sometimes known as teenage relationship abuse).
- Trafficking.

### **Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter" or "part of growing up".

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

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

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

- You must tell the DSL and record the allegation, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved – both the child(ren) who experience the abuse and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS), and other agencies if appropriate.

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

- Challenging any form of derogatory or sexualised language or behaviour.
- Being vigilant to issues that particularly affect different vulnerable groups—Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils know they can talk to staff confidentially by to ensure their wishes are understood.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

### **Signs of Abuse**

All staff should be aware of and be vigilant in looking out for possible signs of abuse. These include (but are not limited to):

- Where the pupil makes a disclosure, says they have been abused or asks a question which gives rise to that inference.
- Where there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries.
- Where the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour.
- Where the pupil is reluctant to work with a member of staff and does not wish to discuss reasons.
- Where the pupil's development is delayed.
- Where the pupil loses or gains weight or there is deterioration in the pupil's general well-being.
- Where the pupil appears neglected, e.g., dirty, hungry, inadequately clothed.
- Where a pupil has unexplained absences that they cannot account for.
- Where a pupil expresses views that appear to justify violent extremism.
- Where the pupil is reluctant to go home or has been openly rejected by his/her parents or carers.

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)

### **Duty of Employees, Directors, Councillors and Volunteers**

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Every employee (whether directly of CLF or an external provider), Director of the Cabot Learning Federation and Councillor of each Academy as well as every volunteer who assists the Federation is under a general legal duty:

- To protect children and Vulnerable Adults from abuse.
- To be aware of the Federation's Child Protection Policy and Procedures and to follow them.
- Where possible ensure more than one emergency contact telephone number is recorded for each pupil.
- The school operates "safer recruitment" procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers.
- To know how to access and implement the procedures, independently if necessary.
- To keep a sufficient record of any significant complaint, conversation, or event in accordance with this policy.
- To report any matters of concern to the Designated Safeguarding Lead\* or directly to Children's Social Care if required.
- To be aware of other CLF and Academy specific policies and procedures that have safeguarding implications (for example restraint, E-safety, intimate care plans, anti-bullying arrangements).

*\*Staff may share information directly with Children's Social Care or the Police if they are convinced that there is a risk of immediate serious harm, and a direct report is the only way to ensure the pupil's safety and the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, the Principal, Executive Principal, and the CEO are not available.*

Councillors should ensure their Academy's safeguarding arrangements take into account the procedures and practice of the Local Authority Safeguarding Partners.

The Cabot Learning Federation (CLF) Multi Academy Trust (MAT) is wholly committed to ensuring that all children and adults at risk who engage with the CLF are cared for in a safe and secure environment.

### **The CLF will establish and maintain an environment and culture where:**

- children are kept safe, feel safe, are able to talk about and are listened to when they have a worry or concern.
- parents/carers are confident that their child is kept safe and feels safe.
- staff and volunteers feel safe, are encouraged and able to talk and are listened to when they have concerns about the safety and wellbeing of a child.

- ensure children know that there are adults in any school within the CLF whom they can approach if they are worried.
- Ensure that children who have additional/unmet needs are supported appropriately. This could include referral to early help services or specialist services if they are a child in need or have been/are at risk of being abused and neglected.
- consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

The Cabot Learning Federation will ensure that all policies and procedures in respect of safeguarding children throughout the CLF are up to date and in line with the Keeping Children Safe in Education.

**The CLF will ensure that all their academies:**

- have a designated safeguarding Lead Officer (DSLO) and a designated governor/link Academy Council member for safeguarding.
- have in place safeguarding arrangements which adhere to the statutory guidance in Keeping Children Safe in Education 2023, and which are designed to take account of all possible safeguarding issues including child sexual exploitation (CSE) and preventing radicalisation.
- adhere to safe recruitment practices.
- maintain a Single Central Record (SCR).
- have arrangements for working together with other agencies and for sharing information with other professionals.
- take account of local procedures and practices established by the local Safeguarding Children Boards and comply with any requests from those Boards.
- have in place effective child protection and staff behaviour/code of conduct policies.
- provide appropriate supervision and support for staff including undertaking safeguarding induction and training.
- follow clear policies for dealing with allegations against people who work with children.
- have clear procedures in place to handle allegations of abuse against children.
- have clear whistleblowing procedures following the CLF Whistleblowing Policy.
- appoint a designated teacher to promote the educational achievement of children who are looked after and ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe.
- put in place appropriate safeguarding responses to children who go missing from education.
- fulfil all of their statutory responsibilities in respect of safeguarding and promoting the welfare of children.

**The CLF will:**

- Monitor the quality of safeguarding practices and their impact on outcomes for children across the Trust and provide regular reports to the Trust Board. An annual report to the CLF Board of Trustees will address key safeguarding concerns that have arisen, issues flagged following post incident reviews and audits, emerging safeguarding issues and training needs.
- Monitor academy compliance at each academy within the CLF, through an annual safeguarding audit, a report to Academy Council link members by each Academy and through staff performance measures.

- Work with the Principals of the academies to ensure that the performance of vulnerable children is effectively monitored, and that appropriate support is made available to those children who are at risk of achieving poor outcomes.
- Liaise with local authority lead professionals for safeguarding, local authority MASH (Multi Agency Safeguarding Hubs), Ofsted, and other agencies as required.
- Commission external challenge and support where appropriate to ensure academies meet their statutory responsibilities in respect of safeguarding and promoting the welfare of children.
- Provide opportunities to DSL from each academy across the Trust to meet to discuss practice, to share learning and to train together. This will include sharing post incident reviews and action points to improve practice.

### **Staff Training**

- Tewkesbury Academy will ensure that all staff members undergo safeguarding and child protection (including online safety) training at induction.
- Will receive appropriate safeguarding and child protection (including online safety) refresher training annually using the Nimble Online Platform and Face to Face Training (Including information and new guidance shared by email e-bulletins and staff meetings).
- All staff must complete FGM awareness training as part of the Nimble Safeguarding Essentials Course and will understand their legal duty under the Mandatory Reporting Duty.
- All staff must complete PREVENT awareness training. This is to ensure that they can comply with the legal expectations under the PREVENT duty. This can be provided by the Home Office E Learning tool (see the link under Preventing Radicalisation) or face to face training delivered and wrote by appropriately trained staff.
- All staff must receive training to understand their responsibilities regarding filtering and monitoring of ICT systems.
- Staff training includes clear reference to internal whistleblowing policy and guidance for escalating concerns.

### **Designated Safeguarding Lead and deputies:**

- Will undergo formal training to provide them with the knowledge and skills (including online safety) training required to carry out the role. The training will be updated every two years.
- Deputies will be trained to the same level as the DSL.
- The DSL and any deputies will liaise with the Local Safeguarding Partnership to ensure that their knowledge and skills are updated via e-bulletins, attend DSL network meetings, and take time to read and digest safeguarding bulletins.

### **Other training considerations:**

- The governing body will ensure that at least one person on any appointment panel will have undertaken safer recruitment training, in line School Staffing (England) Regulations 2009.
- Members of the Senior Leadership Team will make themselves aware of and understand their role within the local safeguarding arrangements. This will ensure that those who have

responsibility for the management of behaviour, inclusion, Special Educational Needs, attendance, and exclusions will carry out their duties with a safeguarding consideration.

- The Designated Teacher for Children in Care will undergo appropriate training to fulfil their role to promote the educational achievement of registered pupils who are in care.
- The mental health lead has access to appropriate training.
- Training around specific safeguarding topics (including online safety) will be integrated, aligned, and considered as part of a whole school safeguarding approach.
- Appropriate colleagues have received appropriate training in relation to use of reasonable force and positive handling.
- *'Keeping Children Safe in Education'* will be issued to all staff and identifies expected 'behaviours' to keep students safe.
- Further training will be provided on an on-going basis to enable teachers and others to deliver the curriculum in a way that uses opportunities in learning to educate and challenge extremist ideas. This includes ensuring staff find opportunities to encourage students to respect other people and to promote good relations with particular regard to the protected characteristics set out in the Equality Act 2010.

## **Homestay**

### **Host families**

Schools often make arrangements for children to take part in exchange visits, either to other parts of the UK or abroad. Exchanges can benefit learning across a range of subjects. Foreign visits can enrich the languages curriculum and provide exciting opportunities for pupils to develop their confidence and expertise in the use of other languages.

### **What is the responsibility of the school?**

Schools have a duty to safeguard and promote children's welfare as outlined in this policy. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit the school arranges, and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

### **Suitability of adults in UK host families for homestay arranged by the school.**

When arranging a homestay, schools should consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

In circumstances where a school arranges for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related (including where a person has parental responsibility for the visiting child), the responsible adults will be engaging in 'regulated activity' for the period of the stay. In such cases and where the school has the power to terminate such a homestay, the school or college would be the regulated activity provider.

A regulated activity provider commits a criminal offence if it knows or has reason to believe that an individual is barred by the Disclosure and Barring Service (DBS) from engaging in regulated activity but allows that individual to carry out any form of regulated activity.

### **Private arrangements**

Where the child's parent(s) or a student arranges their own homestay themselves, this would be a private arrangement, therefore the school or college would not be the regulated activity provider. Where it is a private arrangement, the school is not entitled to obtain a standard or enhanced DBS check.

### **Background checking for adults in homestay arrangements**

When a school arranges a homestay, it should consider what intelligence/information will best inform its assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. It will be for the school or college to use their professional judgement to decide what it considers will be most relevant. However, to help inform that assessment, (name of academy) should obtain, as a minimum, a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed, it will also allow the school or college to consider, alongside all other intelligence that it has obtained, whether the adult would be a suitable host for a child.

### **Volunteer DBS check**

DBS enhanced certificates with barred list information for volunteer roles can be obtained free of charge. In respect of an adult who provides UK homestay and receives no remuneration in respect of the stay or where schools reimburse families only for expenses incurred, to enable a DBS application to be considered as a volunteer role, the 'Position Applied For' field will need to make clear that the position is unpaid. In addition to those engaging in regulated activity, schools are free to decide whether they consider it necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

### **Suitability of adults in host families abroad**

It is not possible for schools and colleges to obtain criminal information from the DBS about adults who provide homestays abroad. Schools should liaise with partner schools abroad, to establish a shared understanding of, and agreement to, the arrangements in place for the visit. They should use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Parents should be aware of the agreed arrangement. Schools are free to decide whether they consider it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK.

The school should produce a written risk assessment outlining the approach taken and indicating the reasons for specific decisions.

During the visit Pupils should understand who to contact during a homestay should an emergency occur, or a situation arise which makes them feel uncomfortable.

### **Additional action for extended homestays**

Where a period of UK homestay lasts 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to Private Fostering under the Children Act 1989. In these cases, the school should notify the local authority of the arrangements. Private fostering legislation places a duty on local authorities to satisfy themselves that the welfare of a child who is being, or proposed to be, privately fostered in their area is being or will be satisfactorily safeguarded and promoted. By notifying the local authority, the school and college will be assisting the local authority in discharging its duty. See section on Private Fostering

## Use of reasonable force

'Reasonable force' refers to the physical contact to restrain and control children using no more force than is needed.' The use of reasonable force is down to the professional judgement of the staff member concerned and will be determined by individual circumstances and the vulnerability of any child with Special Educational Needs or Disability (SEND) will be considered.

- The use of reasonable force will be minimised through positive and proactive behaviour support and de-escalation and will follow government guidance ([Use of Reasonable Force in Schools 2013](#); [Reducing the need for restraint and restrictive intervention, 2019](#)).
- There is robust recording of any incident where positive handling or restraint has been used. Further review of the incident is carried out to reflect on how the incident could be avoided, this will involve the child and their family.
- All academies will have a selection of staff trained in Positive Handling (Team Teach) and will record any incidents that occur in Bound and Numbered books. A designated member of staff in each academy will be responsible for monitoring and signing off all recorded incidents. All staff will know where the bound and numbered book is kept and when they are required to complete an incident form.

Team-Teach is a whole setting, behaviour management response that aims to use de-escalation and behaviour strategies as a standard response to challenging behaviour. However, this is incorporated with restrictive positive handling techniques that are graded and gradual (up or down) as the situation requires.

### The Team-Teach Positive Handling approach will:

- Reinforce policy and practice, inform of current legislation, legal considerations and circular guideline concerning restrictive physical intervention.
- Reinforce the essential verbal and non-verbal skills required in a crisis situation.
- Make staff groups aware of necessary interventions appropriate to the level of behaviour reached by the pupil.
- Following training, providing staff with knowledge, understanding and physical skills required for their personal safety, and the management of young people in their care.
- Offers post-incident structure to both the pupil and member of staff.
- Underpinned by the foundations of all actions being assessed against being reasonable, necessary, and proportionate.

## Suspensions, permanent exclusions, and commissioning of Alternative Provisions

**(To be read in conjunction with the Behaviour Policy)**



When the setting is considering suspending or permanently excluding a learner where additional vulnerability is identified it is important that the learner's welfare is a paramount consideration. The principal will consider their legal duty of care when sending a learner home.

Tewkesbury Academy will exercise their legal duties in relation to their interventions. This includes:

- whether a statutory assessment should be considered in line with the principles of [Children Act 1989](#),
- that decisions are made in an anti-discriminatory manner in line with the [Equality Act 2010](#) (including having regard to the [SEND Code of Practice](#))
- and takes into consideration the learner's rights under the [Human Rights Act 1998](#).
- Interventions will be consistent with statutory guidance School suspensions and permanent exclusions - GOV.UK ([www.gov.uk](http://www.gov.uk))

Actions to take:

- An assessment of need should be undertaken with multi-agency partners with a view to mitigate any identified risk of harm this in line with [2.3 Identifying and monitoring the needs of vulnerable learners](#).
- If the child is subject to a child protection plan or where there is an existing child protection file, we will call a multiagency risk-assessment meeting prior to making the decision to exclude.
- In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the governing body.

#### Commissioning Alternative Provisions

In the event where Tewkesbury Academy commissions an Alternative Provision they will follow their Local Authority guidance to ensure clear agreement of roles and responsibilities to maintain safeguarding arrangements for learners who are not taught on site.

Tewkesbury Academy will continue to be responsible for the safeguarding of that learner and will make necessary checks (CLF Quality Assurance Checklist) on the provider to meet the needs of the learner. Written confirmation from the Alternative provider will be obtained of the checks on staff that we would otherwise perform for our own staff.

#### **Online Safety**

Online safety is an integrated and interwoven theme with other safeguarding considerations. It is essential that the DSL takes a lead on ensuring that interventions are effective. This means coordinating support and engaging with other colleagues in the setting who may have more technological expertise such as the IT manager.

Tewkesbury Academy is committed to addressing online safety issues around content, contact, conduct and commerce. This includes:

- Ensuring that online safety is concerned in relevant policies and procedures.
- Online safety is interwoven in safeguarding training for staff and safeguarding on the curriculum for learners.

- Acknowledging that peer on peer abuse can happen via mobile and smart technology between individuals and groups. This should be approached in the same process outlined in the section Responding to incidents of Child-on-Child harm and read in conjunction Tewkesbury Academy 's policy on the use of mobile smart technology.
- Provision of education via remote learning will comply with governmental advice [Safeguarding and remote education during coronavirus \(COVID-19\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19)
- The effectiveness of the setting's ability to safeguarding learners in respect to filtering and monitoring, information security and access management alongside the above will be reviewed annually.

### **Whistleblowing**

All staff are required to report to the Principal of their Academy, the Executive Principal, CEO, Chair of Academy Council or the Chair of the Federation Trust Board, any concerns or allegations about Academy practices or the behaviour of colleagues (including supply staff and volunteers) which are likely to put pupils at risk of abuse or other serious harm. In the event of their unavailability, concerns should be reported to the Designated Safeguarding Lead or the Deputy in his / her absence.

If it is felt necessary to consult outside the Academy, staff should speak in the first instance to the LADO (Local Authority Designated Officer) following the Whistle Blowing Policy. Further guidance can be found in **KCSIE 2024 - Part four: Allegations of abuse made against teachers and other staff**.

There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

### **Supporting Children and Young People**

The Federation will do all that it can to support pupils who have been subject to abuse. This may include:

- Recognising that any pupil who has been abused and/or sees, hears, experiences domestic violence may feel vulnerable, helpless, and humiliated, and may blame themselves and find it difficult to develop and maintain a sense of self-worth.
- Recognise that the Academy may provide the only stability in the lives of the pupils who are at risk or harm or have been abused, and that this needs to be maintained.
- Offering a range of pastoral support and bringing in external support or signposting where appropriate to other experts e.g., Educational Psychologist, Counsellor.
- Ensuring that the curriculum includes content relating to improving self- esteem, healthy relationships, and safeguarding.
- Providing additional support to vulnerable pupils during transition into, or out of, the Academy.

### **Professional Expectations and Responsibilities**

Role of all staff:

- All staff will read and understand Part 1 of statutory guidance Keeping Children Safe in Education (2023). Those working directly with children will also read Appendix B.

- In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding/Child Protection Policy; the Behaviour Policy; the Staff Behaviour Policy (code of conduct); safeguarding response to children who go missing from education; and the role of the Designated Safeguarding Lead (DSL).
- Know who and how to contact the DSL and any deputies, the Chair of Governors [**or equivalent – amend as necessary**], and the Governor responsible for safeguarding.
- All staff will be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
  - who may need a social worker and may be experiencing abuse or neglect.
  - requiring mental health support.
  - may benefit from early help.
  - where there is a radicalisation concern.
  - where a crime may have been committed.
- Be clear as to the setting's policy and procedures about [peer on peer abuse](#), children missing education and [those requiring mental health support](#), and the [impact of technology in relation to online safety](#).
- Be involved where appropriate, in the implementation of individual.
- plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- Record concerns appropriately and in a timely manner by using the setting's safeguarding systems.
- To be aware of the need to raise to the senior leadership team any concerns they have about safeguarding practices within the school.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children 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.

### Early help

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.

If early help is appropriate, the DSL (or Deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

## What school and college staff should look out for?

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 and has specific additional needs.
- has special educational needs (whether or not they have a statutory education, health and care plan (EHCP)).
- 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.
- is frequently missing/goes missing from care or from home.
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking, or exploitation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- has returned home to their family from care.
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalised or exploited.
- is a privately fostered child.

## Information Sharing

Tewkesbury Academy is committed to have due regard to relevant data protection principles which allow for sharing (and withholding) personal information as provided for in the Data protection Act 2018 and UK General Data Protection Regulations. This includes how to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'.

Staff at the setting are aware that:

- 'Safeguarding' and 'individuals at risk' is a processing condition that allows practitioners to share special category personal data.
- Practitioners will seek consent to share data where possible in line with [Information Sharing for Safeguarding Practitioners 2024](#).

There may be times when it is necessary to share information without consent such as:

- To gain consent would place the child at risk,
- by doing so will compromise a criminal investigation,
- It cannot be reasonably expected that a practitioner gains consent,
- or, if by sharing information it will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent.

There are also times when Tewkesbury Academy will not provide pupil's personal data where the serious harm test under legislation is met, (by sharing the information the child may be at further risk). When in doubt [name of setting] will seek legal advice.

**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.**

### **Bullying and Harassment**

All Academies will have a policy and procedure to prevent bullying and harassment and to deal with any cases that arise. If bullying or harassment is likely to cause 'significant harm' or could be considered a hate crime (e.g., is homophobic, racist, disablist etc.) then it should be reported to Children's Social Care or the Police using the safeguarding procedures.

### **Visitors**

Academies will put in place robust arrangements to ensure that all visitors are monitored for safeguarding purposes. All visitors will be asked to sign in at Reception and will be given basic information about safeguarding. Visitors who do not provide evidence of DBS and/or photo ID will not be left unsupervised in an Academy.

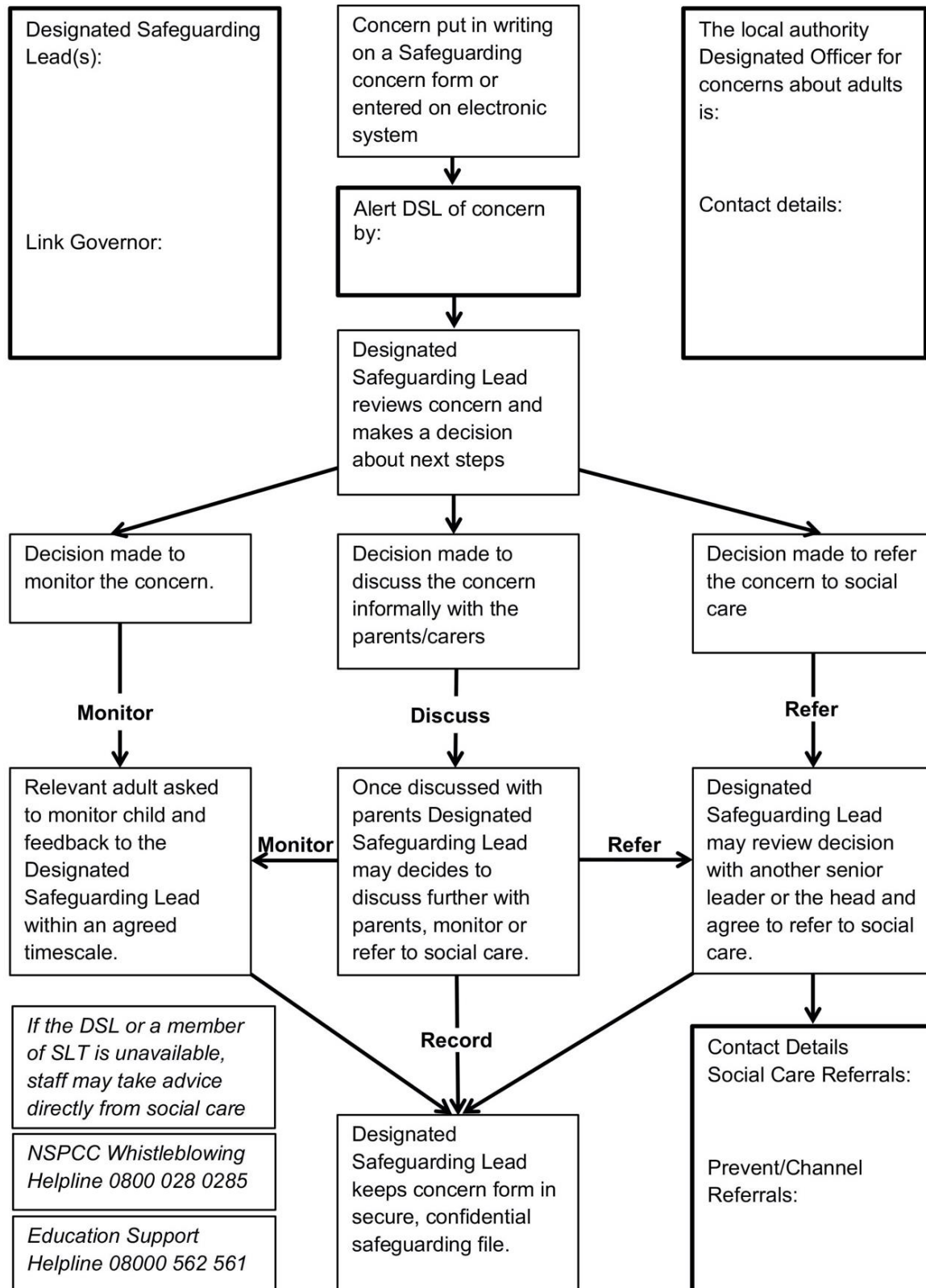
### **Monitoring and review**

The Federation will review the Policy each year against the national legislative framework, national and local guidance, and accepted best practice. Academies should also review their procedures at least annually.

An end of term and annual report on safeguarding will be produced by each Academy for their Council and for the Federation.

**Appendix 1: Raising Safeguarding Concerns about a Child**

**FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD**



## Appendix 2: Safeguarding Referral

Tewkesbury Academy uses CPOMS for the monitoring of Safeguarding and Child Protection issues. Working alongside the Academy's existing safeguarding processes, CPOMS will help with the management of child protection, behavioural issues, bullying, special educational needs, domestic issues and much more.

Every member of staff across the Academy has an obligation to report any concerns which they may have using CPOMS. The system allows the Academy to record information in a central repository and have relevant people alerted immediately.

All staff that have access are expected to report their concerns using CPOMS, staff will still have the opportunity to ask for advice from the Safeguarding Team.

CPOMS Instructions can be found in Appendix 6.

Anyone who does not have access to CPOMS will be expected to fill in an Academy incident form.

Academies to insert paragraph explaining this process.

**For those members of staff that cannot access CPOMS, Supply staff, volunteers, external agencies each Academy will ensure that they are made aware of the Academies process required to report a Safeguarding incident using the following incident form.**

## Appendix 3 Incident Form

### Safeguarding Referral Form (to be used if a disclosure is made by a pupil or parent/carer)

*This form should be used when pupil or parent/carer disclosed to any member of staff or volunteer that they or another pupil is suffering from, or is at risk of, abuse (defined as 'significant harm'. Please refer to the guidance overleaf before proceeding, and when completed, pass the form immediately to the Designated Safeguarding Lead or their Deputy.*

1. **Name of referrer:**

2. **The Pupil:**  
Name

Parent/ Carer details:  
Name(s):   
Address:   
Mobile/Phone:

3. **The Issue** (record of conversation – used continuation sheet if necessary)

- Record what was said by the pupil and by you.
- Include as much detail as you can about any perpetrator.
- Use the exact words and phrases used by the pupil.
- Clearly distinguish between fact, observation, allegation, and opinion
- Note the non-verbal behaviour and the key words in the language used by the pupil

4. **Did anyone else witness this disclosure?**

Name and contact of others present:

5. **Did the child/vulnerable adult give consent to share?**

Please state the exact words used:

**If not did you explain that you would have to share this information with the designated safeguarding Lead and who else might receive this information and why?**      **Yes No**

6. **Has the parent/carer been notified?** **Yes No**



If yes, what did they say?

Note exact words used by the parent/carer.

7. **Additional Information**

Take into account issues of Data Protection, including any relevant background information about family situation etc. that you are aware of, any siblings or other young people who may be at risk, any support services or agencies involved with the young person.

8. **Any other comments**

Signed ..... Time and date: .....

**Ensure the pupil is safe and being cared for before you leave them and be clear what you have agreed about contacting them and their parent/carer.**

**This form and any notes taken must be passed to the Designated Safeguarding Lead or their Deputy as soon as possible and in any event no later than the end of the timetabled day. Keep a copy for yourself.**

If the allegation or complaint is made against the Designated Safeguarding Lead or their Deputy, this information should be passed directly to Principal.

## Dos and Don'ts

### Do:

- Allow the pace of the conversation to be dictated by the pupil.
- Ask neutral questions which encourage the pupil to talk such as “can you tell me what happened?”
- Accept what the pupil says and do not ask for further detail.
- Acknowledge how hard it was for them to tell you.
- Reassure the pupil that they have done the right thing.
- Explain whom you will have to tell (the Designated Safeguarding Lead) and why.

### Don't:

- 1 Burden the pupil with guilt by asking questions such as “why didn't you tell me before?”
- 2 Interrogate or pressure the pupil to provide information.
- 3 Ask any questions that start with the words, how, what, when where and why
- 4 Criticise any perpetrator.
- 5 Promise confidentiality or make promises that you cannot keep such as “it will be alright now”.

The TED Framework is useful:

**TELL ME**

**EXPLAIN TO ME**

**DESCRIBE TO ME**

All forms should be signed off by the Designated Safeguarding Lead and filed securely. The outcome must also be recorded.

## Appendix 4: Academy Safeguarding Procedures

### Contacts and Key Personnel

<b>Name of Academy:</b>	<b>Tewkesbury Academy</b>
<b>Telephone Number:</b>	01684 292152

#### Designated Safeguarding Lead

<b>Name / Email:</b>	<b>Jade Buck:</b> <a href="mailto:Jade.buck@clf.uk">Jade.buck@clf.uk</a>
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#### Deputy Designated Safeguarding Leads

<b>Name / Email:</b>	<b>Rachel Hawtree:</b> <a href="mailto:Rachel.hawtree@clf.uk">Rachel.hawtree@clf.uk</a>
	<b>Kathleen McGillicuddy:</b> <a href="mailto:Kathleen.mcgillicuddy@clf.uk">Kathleen.mcgillicuddy@clf.uk</a>
	<b>Clare de Glanville:</b> <a href="mailto:claredeglanville@clf.uk">claredeglanville@clf.uk</a>
	<b>Robert Young:</b> <a href="mailto:Robert.young@clf.uk">Robert.young@clf.uk</a>
	<b>Geraint James:</b> <a href="mailto:Geraint.james@clf.uk">Geraint.james@clf.uk</a>
	<b>Adam Griggs:</b> <a href="mailto:adam.griggs@clf.uk">adam.griggs@clf.uk</a>

#### Principal

<b>Name / Email:</b>	<b>Kathleen McGillicuddy:</b> <a href="mailto:Kathleen.mcgillicuddy@clf.uk">Kathleen.mcgillicuddy@clf.uk</a>
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#### Designated Councillor

<b>Name / Email:</b>	<b>Sue Maizonnier:</b> <a href="mailto:sue.maizonnier@guest.clf.uk">sue.maizonnier@guest.clf.uk</a>
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#### CLF Designated Safeguarding Lead Officer & Deputy Lead Officer:

<b>Name:</b>	<b>Steve Bane &amp; Adele Rice</b>
<b>Email:</b>	<a href="mailto:Steve.Bane@clf.uk">Steve.Bane@clf.uk</a> <a href="mailto:Adele.Rice@clf.uk">Adele.Rice@clf.uk</a>

#### Academy Prevent Officer

<b>Name / Email:</b>	<b>Kathleen McGillicuddy:</b> <a href="mailto:Kathleen.mcgillicuddy@clf.uk">Kathleen.mcgillicuddy@clf.uk</a>
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#### Academy E Safety Officer

<b>Name / Email:</b>	<b>Ed Fair:</b> <a href="mailto:Ed.fair@clf.uk">Ed.fair@clf.uk</a>
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## Local Authority Contact Information

### Local Authority Designated Officer (LADO)

Bristol	Nicola Laird	0117 9037795 07795 091020	<a href="mailto:nicola.laird@bristol.gcsx.gov.uk">nicola.laird@bristol.gcsx.gov.uk</a>
South Glos	Jon Goddard	01454 868508	<a href="mailto:Jon.Goddard@southglos.gov.uk">Jon.Goddard@southglos.gov.uk</a>
North Somerset	Julie Bishop	01275 888624	<a href="mailto:Julie.bishop_hss@n_somerset.gov.uk">Julie.bishop_hss@n_somerset.gov.uk</a>
BANES	Jackie Deas	01225 396810	<a href="mailto:Jackie_deas@bathnes.gov.uk">Jackie_deas@bathnes.gov.uk</a>

### Children's Social Care Services'

Gloucestershire MASH	01452 426565
Bristol (First Response)	0117 9036444
South Glos (Access and Response)	01454 866000
North Somerset (Single Point Access)	01275 888808
BANES (Children's Social Work Services)	01225 396339

### Local Safeguarding Board

Bristol	0117 9031414
South Glos	01454 866000
North Somerset	01275 888808
BANES	01225 396974

### Other Useful Contact Numbers

**Emergency Duty Team for all Local Authority Areas within the Cabot Learning Federation 01454 615165**

If there is an immediate risk of significant harm ring the Police on 999

The following telephone numbers may be useful for pupils:

Police Child Abuse Investigation Team: 0845 456 7000

Childline: 0800 1111

NSPCC: 0808 800 5000

## **1. Dealing with initial allegation / disclosure of abuse**

### **1.1 A member of staff suspecting or hearing an allegation of abuse:**

- must listen carefully to the child and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.
- must not ask leading questions, that is, a question which suggests its own answer.
- must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken.
- must keep a sufficient written record of the conversation (if possible, on the referral form in Appendix 3). The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead.
- Staff may share information directly with Children's Social Care or the Police if they are convinced that there is a risk of immediate serious harm and a direct report is the only way to ensure the pupil's safety and the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead, the Principal, Executive Principal, and the CEO are not available.
- Preserving Evidence - All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved.

## **2. Reporting**

- 2.1 If a member of staff is concerned that a pupil may be suffering harm, the matter should be referred to the Designated Safeguarding Lead as soon as possible. All suspicion or allegation of abuse must be reported to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead, or if the complaint involves the Designated Safeguarding Lead, to the principal.
- 2.2 All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- 2.3 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 that may follow a referral, along with the role they might be expected to play in such assessments.
- 2.4 CLF Academies will work with social care, police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

## **3. Action by the Designated Safeguarding Lead**

### **3.1 The action will take into account:**

- The local inter-agency procedures of the Local Safeguarding Children Board relevant to the area where the Academy is based.
- The nature and seriousness of the suspicion or allegation. Where it is considered that the child has suffered or is at risk of significant harm and/or that a serious criminal offence has taken place will always be referred to children's social care or the police without further investigation within the Federation.

- Duties of confidentiality, so far as applicable.
- The wishes and feelings of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes.
- The wishes of the complainant's parents/carers provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Safeguarding Lead is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose.
- The lawful rights and interests of the Federation community as a whole including its employees and its insurers.
- When deciding whether to make a referral, the Designated Safeguarding Lead should not make their own decision over what appears to be borderline cases. If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead may consult with Children's Social Care on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay.
- If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to children's social care within 24 hours, using the agreed Multi-agency Form. If no response or acknowledgment is received within three working days, the Designated Safeguarding Lead will contact Children's Social Care again.
- The Academy will not do anything that may jeopardise a police investigation.

#### **4. Referral guidelines**

4.1 A referral to Children's Social Care or Police will not normally be made where:

- The child has not suffered, or is not considered to be at risk of, significant harm.
- A referral would be contrary to the wishes of a pupil complainant who is of sufficient maturity and understanding and properly informed, and contrary also to the wishes of the complainant's parents/carers; and
- The case is one that does not involve 'significant harm' and can be satisfactorily investigated and dealt with under the Academy's internal procedures, the parents/carers being kept fully informed, as appropriate.
- However, if during the course of the internal procedures, it appears that the situation is more serious, the Designated Safeguarding Lead will again consider whether a referral should be made in accordance with paragraph 4.1 above.

#### **5. Specific actions to take on topical safeguarding issues.**

5.1 General or national guidance will not be included here. A summary of specific duties are in [Keeping Children Safe in Education 2024](#) and Access to local guidance can be found in Appendix 1 of this document.

- 5.2 In recognition that the threshold of child protection is 'likely to suffer' significant harm, Tewkesbury Academy may need to make a referral to children's social care. Where possible, this will involve notifying the parent/carer if it does not place the learner at further risk of harm. In all other circumstances information will be shared in line with section Information Sharing.
- 5.3 It is also important to recognise the importance of liaising with other education settings who may have siblings attending. It is likely that they may hold additional information which will support early identification of harm and in turn develop your assessment of need.

## **6. Child Exploitation – both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

- 6.1 Tewkesbury Academy will ensure that early help intervention is provided as soon as a concern of exploitation is identified. Discussion and advice will be sought from targeted services to consider what support may be available. The learner and their families will be part of any planning and interventions.
- 6.2 If the learner is at risk of CSE or there is intelligence which indicates that the learner or peer group are at risk of CSE, Tewkesbury Academy will share information with Operation Topaz (the police). This information will support proactive activity to disrupt criminal activity in relation to sexual exploitation.
- 6.3 If the learner is at risk of CCE information should be shared with the Local Authority Violence Reduction Unit who can advise and support settings to manage risk. Targeted support maybe available to disrupt learners from getting involved with criminality.
- 6.4 Avon and Somerset Police share 'Missing persons' notifications (which a learner is reported missing from home or care) with education settings with a view to support them to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes. These should be stored securely on the learner's Safeguarding/Child Protection file.

## **7. Domestic Abuse**

- 7.1 Operation Encompass is a national operation where local police forces notify when the police are called to an incident to domestic abuse. Avon and Somerset have their own version of this and will notify education settings whenever they have responded to a domestic abuse incident. This will enable the education setting to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes.
- 7.2 Under the current information sharing protocol, the education setting is not permitted in sharing this information without seeking consent from Avon and Somerset police in case this can put a victim and learners at further risk of harm. The only exception to this when information is shared with new education setting (part of statutory duties in relation to transfer of the Safeguarding/ Child Protection file, Keeping Children Safe in Education). Additional instructions around this are sent out with every single notification.
- Education settings must have signed up to a Police Safeguarding Notification Briefing to receive these.
  - Each setting should have at least 2 members of trained staff able to receive and act upon these notifications.

- Each setting should promote an open culture of safeguarding to enable learners and families to disclose and feel safe to talk about their experiences and what support may be required.

## 8. Female Genital Mutilation

8.1 Mandatory reporting duty: [Click here for government guidance](#)

8.2 This is a legal duty for all professionals undertaking teaching work to report known cases of FGM to the police via 101. This is when they:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on

8.3 These cases must be referred to the DSL who will support them to carry out their duty. It is also advised any referrals made to the police under the mandatory reporting duty is followed up with children's social care, so an assessment of need and support is concurrently considered.

8.4 **Travel:** National guidance has highlighted going on holiday to a risk affected country is cause for concern, local guidance has been developed to prevent discriminatory action against families from risk affected communities.

- Families are encouraged to notify the education setting when they are looking to travel during term time dates.
- This will prompt a conversation with the DSL/ specialist trained member of staff to discuss and explain what FGM is in that; it is significantly harmful and illegal to practice this.
- The setting (all academies in all local authorities) will complete an FGM Referral Risk assessment (available on the Keeping Bristol Safe Partnership website) with the family to identify any support that the family may require in relation to FGM.
- Proportionate action is taken. Referrals to social care should NOT be automatically made – however should be made if there are high risk concerns identified from the FGM Referral Risk Assessment.
- These assessments should be saved onto the child's Safeguarding/Child Protection file to avoid duplication with new incidents of travel.

## 9. Online Safety

9.1 **Appendix D of Keeping Children Safe in Education highlights additional actions schools should take to keep learners safe online.**

9.2 For concerns around individual cases where a child has been harmed through online mediums, advice and guidance can be made through the **Professional Online Safeguarding Helpline**, T: 0344 381 4772, E: [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)

9.3 Where there have been established cases of online abuse or grooming, the school settings should alert - **Child Exploitation and Online Protection command (CEOPS)** <https://www.ceop.police.uk/ceop-reporting/>

## 10. Mental health



Linked to section within main body of this policy

## **11. Child-on-child abuse**

Linked to section within main body of this policy

## **12. Serious Youth Violence**

12.1 To be read in conjunction with the above section around Child Criminal Exploitation. There has been local guidance issued on the issue of [‘Offensive Weapons in Education Settings’](#).

12.2 It is important to note that should a weapon be used or there is threat of use, the police should be called immediately.

- The same day a weapon is found the Local Authority Violence Reduction Unit should be called for a multi-disciplinary assessment of risk.
- Whilst it is acknowledged that the decision to suspend remains with the principal it is recommended that consultation with the Local Authority Violence Reduction Unit is made so as not to further put the child at further risk of harm if they are suspended.
- Alternatives to suspension should be considered first in recognition that by doing so a learner may be at further risk of harm out in the community.
- Police will be notified through the multi-agency discussion held at the ‘Out of Court Disposals Panel’ to prevent students unnecessarily getting a criminal record.

## **13. Preventing Radicalisation - The Prevent Duty**

13.1 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 to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

13.2 The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads and other senior leaders 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).

13.3 The guidance is set out in terms of four general themes:

- risk assessment,
- working in partnership,
- staff training, and
- IT policies.

## **14. Private Fostering**

14.1 A private fostering arrangement is one that is made privately (without the involvement of a local authority) 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 (\*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.)
  - with the intention that it should last for 28 days or more.
- 14.2 Cases of private fostering arrangements must be reported to children's social care to ensure that needs are adequately made.
- 14.3 Statutory guidance states that this should be done at least 6 weeks before the arrangement is due to start or as soon as you are made aware of the arrangements. Not to do so is a criminal offence.
- 14.4 Further support and reasonable adjustments should be made by the education setting to promote achievement of positive educational outcomes.

## 15. Young Carers

- 15.1 A young carer is a person under 18 who regularly provides emotional and/or practical support and assistance for a family member who is disabled, physically or mentally unwell or who misuses substances.
- 15.2 The setting will support learners who are young carers to appropriate support. To find out what is available locally visit the Gloucestershire Young Carers website - <https://www.bristol.gov.uk/social-care-health/support-for-young-carers>  
<https://www.glosyoungcarers.org.uk/>
- 15.3 The Carers Support Centre can undertake an assessment of need and provide bespoke support. <https://www.carerssupportcentre.org.uk/young-carers/making-a-referral/>

## 16. Allegations against staff

- 16.1 The Federation has procedures for dealing with allegations against staff (and volunteers, agency staff and supply teacher who work with children) that aim to strike a balance between the need to protect children and young people from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures follow Part 4 of *Keeping Children Safe in Education* and Local Council Safeguarding Board arrangements.
- 16.2 Detailed guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm to a pupil. This guidance is contained in the *Staff Manual*. Each Academy's policy on physical restraint is included in the physical contact guidance.
- 16.3 The procedure below is followed when staff or volunteers have (or are alleged to have):
- behaved in a way that has harmed a child or may have harmed a child.
  - possibly committed a criminal offence against or related to a child; or
  - behaved towards a child or children in a way that indicated that he or she would pose a risk of harm if he or she works regularly or closely with children.
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

- 16.4 Any allegations not meeting this criterion will be dealt with in accordance with the Gloucestershire Safeguarding Children Board's procedures. Advice from the LADO (Local Authority Designated Officer) will be sought in borderline cases.
- 16.5 The LADO will be informed immediately (and at the latest within 24 hours) and in any event within one working day of all allegations against staff and volunteers that come to the attention of the Academy and appear to meet these criteria. All such allegations must be dealt with as a priority so as to avoid any delay.
- 16.6 All staff, Councillors, and volunteers in the Academy (including those senior pupils in a position of responsibility) have a responsibility to familiarise themselves with this policy so that they can understand what to do if they receive an allegation against a member of staff or have concerns about the behaviour of a member of staff.
- 16.7 The Academy will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Parents and carers should be made aware of the reporting restrictions preventing publication of any material relating to allegations about staff. The Academy will liaise with the Local Authority Designated Officer (LADO), police and Children's Social Care as to managing confidentiality as appropriate.

## **17. Low level concerns**

- 17.1 This should be read in conjunction with the staff code of conduct and Keeping children Safe in Education (2024) and the CLF Low Level Concerns Policy. A low-level concern is not insignificant. This process should be used in events where a concern about professional conduct does not meet the threshold set out at the beginning of this section.
- Reports should be made to the Principal or DSL. Tewkesbury Academy creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.
  - The Principal or DSL will address unprofessional behaviour and support the individual to correct it at an early stage providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
  - Incidents will be recorded on the CLF low level tracker form. Low Level Tracker requires monitoring on a termly basis and this will be reviewed as a part of the annual Safeguarding Audit. It is the responsibility of the Principal to ensure the LLC Tracker is monitored to check for any patterns of concerning behaviour.
  - Review and correct any deficits in the setting's safeguarding system.

## **18. Procedure for managing allegations against staff.**

- 18.1 An allegation made against teachers and other staff (including volunteers, agency staff and supply teachers) must be reported immediately to the Principal of the Academy. Should the initial allegation first be made to any other member of staff, then that member of staff must either request the person raising the allegation to report it to the principal or if that is not possible to pass details of the allegation to the principal immediately (save where the matter concerns the principal in which case the Executive Principal should be notified). Where appropriate, the Principal or Executive Principal will consult with the Designated Safeguarding

- Lead and the allegation will be discussed immediately with the LADO before further action is taken.
- 18.2 Where an allegation or complaint is made against the Designated Safeguarding Lead or any other member of staff or a volunteer, the matter should be reported immediately to the principal.
- 18.3 Where an allegation or complaint is made against the principal, the person receiving the allegation should immediately inform the Executive Principal, without first notifying the principal.
- 18.4 If it is not possible to report to the principal in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead or, if he / she is unavailable, the Deputy Designated Safeguarding Lead. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the principal or, where appropriate, the Executive Principal.
- 18.5 The person taking action in accordance with these procedures is known as the "case manager".
- 18.6 The LADO will be informed of all allegations which appear to meet the above criteria before further action is taken.
- 18.7 The Principal/Executive Principal will discuss the matter with the LADO and where necessary, the LADO will obtain further details of the allegation and the circumstances in which the allegation was made. The Academy will act in accordance with any advice given by the LADO and will not investigate allegations or inform any individuals without the LADO's consent.
- 18.8 The Academy may take action in the event of allegations against staff in accordance with its disciplinary procedures.
- 18.9 Disclosure of Information
- 18.9.1 The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted.
- 18.9.2 The parents or carers of the child / children involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process.
- 18.9.3 Where the LADO advises that a strategy discussion is needed, or the Police or Children's Services need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 18.9.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.
- 18.10 Action to be taken against the accused.
- 18.10.1 An Academy has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate.
- 18.10.2 Where an investigation by the police or children's services is unnecessary, the LADO will discuss the steps to be taken with the case manager. The appropriate action will depend on

the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

18.10.3 It may be necessary to undertake further enquiries to determine the appropriate action. If so, the LADO will discuss with the case manager how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances, it may be appropriate to appoint an independent investigator as advised by the Local Safeguarding Children Board.

## **19. Suspension**

19.1 Suspension will not be an automatic response to an allegation but will be considered where the circumstances warrant it, including:

- there is cause to suspect a child or other children at the Academy is or are at risk of significant harm.
- the allegation warrants investigation by the police.
- the allegation is so serious that it might be grounds for dismissal.
- it is necessary to progress the investigation.

19.2 Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the Academy or providing an assistant when the individual has contact with children. The LADO will be contacted for advice if necessary.

19.3 If suspension is deemed appropriate, the reasons and justifications will be recorded by the Academy and the individual will be notified in writing of the reasons usually within one working day. Appropriate support will be provided for the suspended individual and contact details provided.

19.4 At the conclusion of a case where an allegation is substantiated, the LADO and the Academy should review the circumstances of the case to determine whether there are any improvements to be made to the Academy's procedures and practices.

## **20. Criminal proceedings**

20.1 The Academy will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

## **21. Return to work.**

21.1 If it is decided that the person who has been suspended should return to work, the Academy will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The Academy will also consider how to manage the contact with the child / children who made the allegation.

## **22. Reporting**

22.1 If the Federation ceases to use the services of a member of staff (or a Director, Councillor or Volunteer) because they are unsuitable to work with children, a settlement/compromise

agreement will not be used and a referral to the Disclosure and Barring Service, PO Box 181, Darlington DL1 9FA, 01325 953795, [dbsdspatch@dbs.gsi.gov.uk](mailto:dbsdspatch@dbs.gsi.gov.uk), will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the Federation, with a report being presented to the Cabot Learning Federation Trust Board without delay.

- 22.2 If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the Academy in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.
- 22.3 Where a teacher has been dismissed or would have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the National College for Teaching and Leadership should be made.
- 22.4 Early Years Foundation Stage – the Principal of the Academy will inform Ofsted as soon as reasonably practicable and at the very latest within 14 days of the allegation being made of any allegation of serious harm or abuse by any person living, working, or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere).

### **23. Record keeping**

- 23.1 Details of allegations found to be malicious will be removed from personnel records.
- 23.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal retirement age or for a period of ten years from the date of the allegation if this is longer.
- 23.3 An allegation that is unsubstantiated, unfounded, or malicious will not be referred to in employer references.

### **24. Malicious or unsubstantiated allegations**

- 24.1 The principal will consider whether to take disciplinary action in accordance with the Academy's behaviour policy where an allegation by a pupil is shown to be malicious or deliberately invented (as well as whether a referral to the police is necessary if there are grounds for believing a criminal offence may have been committed).
- 24.2 The allegation will also be removed from the personnel records and will not be included in references.
- 24.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the Academy reserves the right to contact the police to determine whether any action might be appropriate.

### **25. Timescales**

- 25.1 It is in everyone's interest for cases to be resolved as quickly as possible consistent with a fair and thorough investigation.
- 25.2 All allegations must be dealt with as a priority to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the

nature of the allegation does not require formal disciplinary action, the principal should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days.

## **26. Allegations against pupils**

- 26.1 A pupil against whom an allegation of abuse has been made may be suspended from the Academy during the investigation and the Academy's policy on behaviour, discipline and sanctions will apply.
- 26.2 The Academy will take advice from Children's Social Care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.
- 26.3 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the Academy will ensure that, subject to the advice of children's social care, parents/carers are informed as soon as possible, and that the pupil is supported during the interview by an appropriate adult.
- 26.4 In the case of pupils whose parents/carers are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation.

## **27. Missing child episodes**

- 27.1 All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting any pupil missing from school. The procedure includes the requirement to record any incident, the action taken, and the reasons given by the pupil for being missing. Please see the Academy's Attendance Policy for further details.

## **28. Bullying incidents**

- 28.1 A bullying incident will be treated as a Child Protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.
- 28.2 There may be occasions when a pupil's behaviour warrants a response under Child Protection Procedures rather than the Academy's disciplinary procedures. The Academy will take advice from children's social care as to the appropriate action to take. Parents/carers will usually be informed as soon as possible, unless it is not in the best interests of the child to do so.

## **29. Secure Academy Premises**

- 29.1 The Federation will take all practicable steps to ensure that Academy premises are as secure as circumstances permit. Local Academy procedures cover emergency events including lock down procedures.
- 29.2 Visitors will be required to show picture identification and evidence of DBS clearance, where appropriate. Visitors unable to provide evidence of DBS clearance and/or picture identification will be accompanied by a member of staff at all times while on the Academy site.
- 29.3 In EYFS settings, under no circumstances are images, videos, or audio recordings to be made without the prior consent of the Designated Safeguarding Lead or Principal. Where such recordings are to be taken, written permission must be obtained from parents/carers, who have the right to refuse. This consent may be obtained generally via a single permission form.

Personal mobiles may not be used when children are present but may be used in designated areas during break times; under no circumstances are images, videos, or audio recordings to be made on personal mobiles.

### **30. Suspected harm from outside the Federation**

- 30.1 A member of staff who suspects that a pupil is suffering harm from outside the Federation should seek information from the child with tact and sympathy using "open" and not leading questions. A sufficient record should be made of the conversation and if the member of staff continues to be concerned, he or she should refer the matter to the Designated Safeguarding Lead.

### **31. Organisations or Individuals using school premises**

- 31.1 If we receive an allegation relating to an incident that happened when an individual or organisation was using Tewkesbury Academy premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities) it is required that the Academy Safeguarding Team report any incidents.
- 31.2 As with any safeguarding allegation we will follow our safeguarding procedures, including informing the LADO.

### **32. Informing parents**

- 32.1 Parents/carers will normally be kept informed of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Principal, the LADO, children's social care and/or the police before discussing details with parents/cares.

### **33. Monitoring**

- 33.1 Any Child Protection incidents at the Academy will be followed by a review of the safeguarding procedures within the Academy and a prompt report to the Academy's Council. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the Academy's procedures.
- 33.2 The Designated Safeguarding Lead will monitor the operation of this policy, its procedures and implementation and ensure they are updated and reviewed regularly, working with the Councillors as necessary. The Academy Councils will also make an annual report to The Federation Trust Board.
- 33.3 The Federation Trust Board will undertake an annual review of this policy and its procedures including good cooperation with local agencies and the efficiency with which their duties under it have been discharged.
- 33.4 The Federation Trust Board will ensure that any deficiencies or weaknesses regarding child protection arrangements are remedied without delay.



## Appendix 5: Preventing Radicalisation and Violent Extremism Policy

### 1 Background

- 1.1 Section 26 of the Counterterrorism and Security Act 2015 places a duty on certain bodies (such as school and academies) to have “due regard to the need to prevent people from being drawn into terrorism”.
- 1.2 The *Prevent Strategy*, published by the Government in 2011, has three specific strategic objectives:
  - To respond to the ideological challenge of terrorism and the threat we face from those who promote it.
  - To prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
  - To work with sectors and institutions where there are risks of radicalisation that we need to address.
- 1.3 There is an increasing recognition that there is a need to safeguard children and young people and their families from violent extremism. We are aware of local situations where extremist groups have attempted to radicalise vulnerable young people in our community, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to radicalisation.

### 2 Definitions

- 2.1 Extremism 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.
- 2.2 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 2.3 Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

### 3 A risk-based approach

- 3.1 The national guidance requires academies to take a ‘risk-based approach’ to the *Prevent Strategy*, in order to gain an awareness and understanding of the risk of radicalisation in the local area as well as in their institution, and to understand that no setting is risk-free.
- 3.2 Academies are required to focus on the risks of violent extremism, which represent the greatest threat at national level, while recognising that other forms of violence and extremism can, and do, manifest themselves. The revised Ofsted guidance (Sept 2014) states:  
*‘Inspectors should take into account whether learners are suitably protected from the risks associated with radicalisation and extremism’ and most importantly, that ‘learners feel safe’.*
- 3.3 An annual risk assessment will be carried out by the Designated Safeguarding Lead of each Academy in the format required by their Local Authority and Local Safeguarding Children Board.

## 4 The principles

- 4.1 Preventing violent extremism will be seen as part of the safeguarding duties of all Academies in the Federation, and this Policy will be monitored as part of the Federation's overall Safeguarding Policy.
- 4.2 In general, Academies have a statutory responsibility to:
- At all times, and by all means, seek to create a safe environment for the entire Academy community.
  - Report any concerns about extremism relating to any pupil, family, staff member, Councillor or others associated with the Academy.
  - Work with external agencies, in particular, the Avon and Somerset Constabulary Southwest Counter Terrorism Unit, and Hate Crime Team, the local Children's Safeguarding Board and the Local Authority Designated Officer, whilst always placing the welfare of the individual at the centre of any action taken.
- 4.3 The Academies Prevent Officer will act as the lead for the Prevent agenda.
- 4.4 The Prevent Officer will ensure that:
- Staff are aware they have a duty to report any concerns relating to extremism and are trained to be able to identify children who may be vulnerable to radicalisation, and to know what to do when they are identified.
  - Staff recognise that pupils who are already vulnerable are the most likely to be targeted for radicalisation, and that they have pastoral support systems in place to meet their individual needs.
  - Staff work to build pupils' resilience to radicalisation by promoting fundamental 'British values' (see Appendix 6) and enabling them to challenge extremist views.
  - Monitoring the effect in practice of the school's Religious Studies curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs.
  - The Academy builds into the curriculum a range of activities that promote equality and community cohesion, celebrate diversity, and are designed to encourage good relations between pupils from different backgrounds.
  - Safe spaces are created in the curriculum for pupils to discuss controversial issues in an age-appropriate way, so that children, young people, and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
  - Work is undertaken with staff and pupils to ensure that they have an appropriate understanding of online safety and how to keep themselves safe on-line.
  - There is no promotion of any organisations linked to violent extremism, and that filters are in place to prevent pupils from accessing their resources on-line.
  - Processes are in place to ensure that no external speakers or visitors to the Academy promote any views that are contrary to their Equality policies or that encourage radicalisation or violent extremism.

- 4.5 In relation to pupils identified as at risk of radicalisation, the Designated Safeguarding Lead will:
- Act as the first point of contact within the Academy for case discussions relating to pupils who may be at risk of radicalisation or involved in terrorism.
  - Collate relevant information in relation to referrals of vulnerable pupils to the Avon and Somerset Southwest Counter Terrorism Unit; attending Channel\* meetings as necessary and carrying out any actions as agreed.
  - Report progress on actions to the Channel\* Co-ordinator; and sharing any relevant additional information in a timely manner.

*\*Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity.*

- 4.6 Preventing violent extremism work will not be directed at any specific ideology, religion, religious group, or religious faith, or at the proponents of any other sets of beliefs. Its principal aim is to ensure that Academies are able to monitor, manage and deal effectively with the threat posed by any individual or group of individuals engaging in violent extremism in the name of ideology or belief.
- 4.7 Academies will make clear that there is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals who hold radical views do not become involved in extremist activity.
- 4.8 Academies can play a significant role in preventing radicalisation by fostering shared values and promoting community cohesion, which in turn, can prevent pupils from getting involved in violent extremism.
- 4.9 The Federation values freedom of speech as a fundamental right in our society, however, recognises that free speech must be subject to the laws on equality and human rights, and to the policies of the Federation.
- 4.10 Academies also have Equality Act duties which they will actively implement and report on. These are to:
- Eliminate discrimination, harassment, and victimisation.
  - Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
  - Foster good relations across all protected characteristics.
- 4.11 The Federation recognises that effective engagement with parents/carers/families and the local community (including faith communities and supplementary schools) is also important, as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms.
- 4.12 All Academies will review their existing policies to ensure they address Prevent issues (e.g., Health and Safety, Online Safety, Behaviour).

## 5 Indicators of vulnerability

- 5.1 Pupils may become susceptible to radicalisation through a range of social, personal, and environmental factors. It is known that violent extremists target vulnerable individuals to drive a wedge between them and their families and communities. It is vital that Academy staff are able to recognise and support those who may be vulnerable. The Cabot Learning

Federation are determined to protect young people from extremism and terrorism. This includes all forms of extremism across the spectrum: violent and nonviolent, from Islamist Extremism to the Extreme Far Right.

#### 5.2 Indicators may include:

- Identity Crisis: the pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis: the pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances: migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations: the pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality: which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special Educational Needs: pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

#### 5.3 More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

## 6 Values and Behaviours

- 6.1 In 2014, guidance was produced for maintained schools about incorporating 'British values' as part of their duty to promote SMSC (spiritual, moral, social, and cultural curriculum) under Section 78 of the 2002 Education Act. These are defined as **'the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.'** The guidance advises that attempts to promote systems that undermine fundamental 'British values' would be completely at odds with the duty to provide SMSC.

- 6.2 Promoting these values can be done through the taught curriculum, through collective worship, the Academy ethos and through positive role modelling.
- 6.3 Through their provision of SMSC, academies are expected to:
- Enable pupils to develop their self-knowledge, self-esteem, and self-confidence.
  - enable pupils to distinguish right from wrong and to respect civil and criminal law.
  - encourage pupils to accept responsibility for their behaviour, show initiative, and to understand how they can contribute positively to the lives of those living and working in the locality of the school and to society more widely.
  - enable pupils to acquire a broad general knowledge of and respect for public institutions and services in England.
  - promote further tolerance and harmony between different cultural traditions by enabling students to acquire an appreciation of and respect for their own and other cultures.
  - encourage respect for other people.
  - and encourage respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in England.
- 6.4 Academies will be expected to map *British Values* annually against the whole curriculum and to agree in which areas learning on these issues can be strengthened (See Appendix 6).

## 7. Safeguarding in the curriculum

Tewkesbury Academy is dedicated to ensuring that learners are taught about safeguarding, including online safety. We recognise that a one size fits all approach may not be appropriate for all learners, and a more personalised or contextualised approach for more vulnerable learners, victims of abuse and some SEND children might be needed. This is part of a broad and balanced curriculum.

This includes:

- Working within statutory guidance in respect to [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/relationships-and-sex-education-rse-and-health-education); and [Early years foundation stage \(EYFS\) statutory framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/early-years-foundation-stage-eyfs-statutory-framework)
- Personal, Social, Health and Economic (PSHE) education, to explore key areas such as self-esteem, emotional literacy, assertiveness, power, building resilience to radicalisation, e-safety, and bullying.
- Appropriate filters and monitoring systems are in place to ensure that ‘over- blocking’ does not lead to unreasonable restrictions as to what learners can be taught about online teaching and safeguarding.
- The curriculum will be shaped to respond to safeguarding incident patterns in the setting identified by the Designated Safeguarding Lead and safeguarding team (e.g., to respond to an increase in bullying incidents).
- Providing engagement opportunities with parents and carers to consult on key aspects of the curriculum.

- Learners can inform the curriculum via discussions with the [school council and student body – confirm wording].

## **8 Pupil Support**

8.1 To ensure that pupils are protected, it is important to have in place good pastoral and support systems that support the most vulnerable. This should include:

- Maintaining strong and effective pastoral support services with staff who have thorough understanding of the Prevent agenda.
- Listening to what is happening in the Academy and the community and actively engaging in the local Prevent strategy working groups.
- Implementing anti-bullying strategies and challenging discriminatory behaviour.
- Helping pupils, parent/carers and staff know how to access support in Academy and or through community partners.
- Maintaining good communication links with parent and carers and discussing any concerns with them.
- Supporting 'at risk' pupils through safeguarding and crime prevention processes.
- Focussing on narrowing the attainment gap for all students.
- Working with local faith and other equality communities and bring them into the Academy as role models.

## **10 Meeting religious and cultural needs**

10.1 Academies will consult with their pupils, staff, and parents/carers about their requirements in relation to their faith or religious practice.

10.2 Academies will try to meet any identified needs, where practicable, for example, providing dedicated multi-faith prayer space or meeting particular religious dietary needs.

## **11 Security of Premises**

11.1 Academies will review their site security measures and their procedures for dealing with visitors and with external speakers to ensure that no-one is able to enter the site and influence the pupils and encourage them into radicalisation.

11.2 All Academies will have in place procedures for dealing with a major incident of terrorism or violent extremism e.g., lock down, and will carry out regular practices.

## **13 IT Policies**

13.1 Academies will regularly review their policies relating to the use of IT to ensure that they are up to date in terms of the threats that new social media etc. present and contain specific reference to the Prevent Duty. They will specifically look at the use of filtering as a means of restricting access to harmful content. If appropriate, they will develop clear policies for students and staff using IT equipment to research terrorism and counter terrorism during their learning. Guidance can be found in the CLF Online Safety policy.

13.2 Online safety will also be included in the curriculum for all pupils, whatever their age, and issues of radicalisation will be discussed as appropriate.

## Appendix 6: British Values Statement

The Government guidance requires key 'British Values' are taught in all schools and academies. They define these in the 2011 Prevent Strategy as:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those of different faiths and beliefs

Cabot Learning Federation has clear policies on Equality and Diversity and is committed to promoting community cohesion and fostering good relations between all of the staff, pupils and their families who form part of our community.

We recognise and will celebrate the multi-cultural, multi- faith and ever-changing of the area in which our academies are based.

We understand the vital role the Federation can play in ensuring that groups or individuals within the Academies are not subjected to discrimination, bullying, harassment, or intimidation and will actively promote our policies and procedures to address these issues.

We will work through our safeguarding policies and practices to prevent the radicalisation of our pupils by those wishing to unduly, or illegally, influence them.

We will actively implement our duties under the Equality Act 2010 to prevent discrimination against any individual or group, on grounds of religion or belief, race or ethnicity, gender reassignment, sex, disability, and the other characteristics named in the Act.

The Federation is dedicated to preparing pupils for their adult life through the formal and informal curriculum, ensuring that it models, promotes and reinforces 'British values' to all its students.

Each Academy will use strategies within the National Curriculum and beyond, to secure such outcomes for pupils. Each year they will map how British Values are delivered in their institution, and any areas they intend to address.

### British Values in Tewkesbury Academy

The examples that follow show currently some of the many ways (name of setting) seeks to embed 'British values.

#### Democracy

Democracy is continuous throughout the curriculum at Tewkesbury Academy. Student feedback is actively sought on our curriculum content and delivery, student questionnaires have included mental health, bullying and sex education. Pupil, voice is sought in all curriculum areas and reviewed during the school year. The student parliament provide useful feedback and give the student body a voice in decision making.

#### The rule of law

Tewkesbury Academy behaviour strategy involves the students recognising the rule of law. School Beat are in school delivering sessions in PSHE lessons. topics include grooming, sexting, knife crime, gangs, and county lines. This ranges from discussions around moral consideration to information about the law.

### **Individual liberty**

One of the aims of Tewkesbury Academy is for our students to be empowered and informed members of the community. PSHE includes Citizenship and Employability Skills. Our offer of Cultural Capital represents the key ingredients that a student will draw upon to be successful in society, their career, and the world of work.

### **Mutual Respect**

Equality and diversity are taught within PSHE lessons. We cover topics such as LGBTQ+, homophobia, identity, racism, radicalisation, extremism, prejudice and stereotypes, homelessness. Representation Matters are working in Tewkesbury Academy to focus on racism to encourage acceptance of a diverse range of backgrounds. Anti-bullying CPD has supported all staff to challenge bullying and the red hand reporting system is utilised by students and parents

### **Tolerance of those of different faiths and beliefs**

PSHE engages students on the moral and ethical context of acceptance, as well as the impact of intolerance. Tutor time sessions now include weekly character education and activities. Spiritual development is covered through the RE/ Ethics curriculum and includes use of assemblies, involvement with local churches team and visiting speakers.

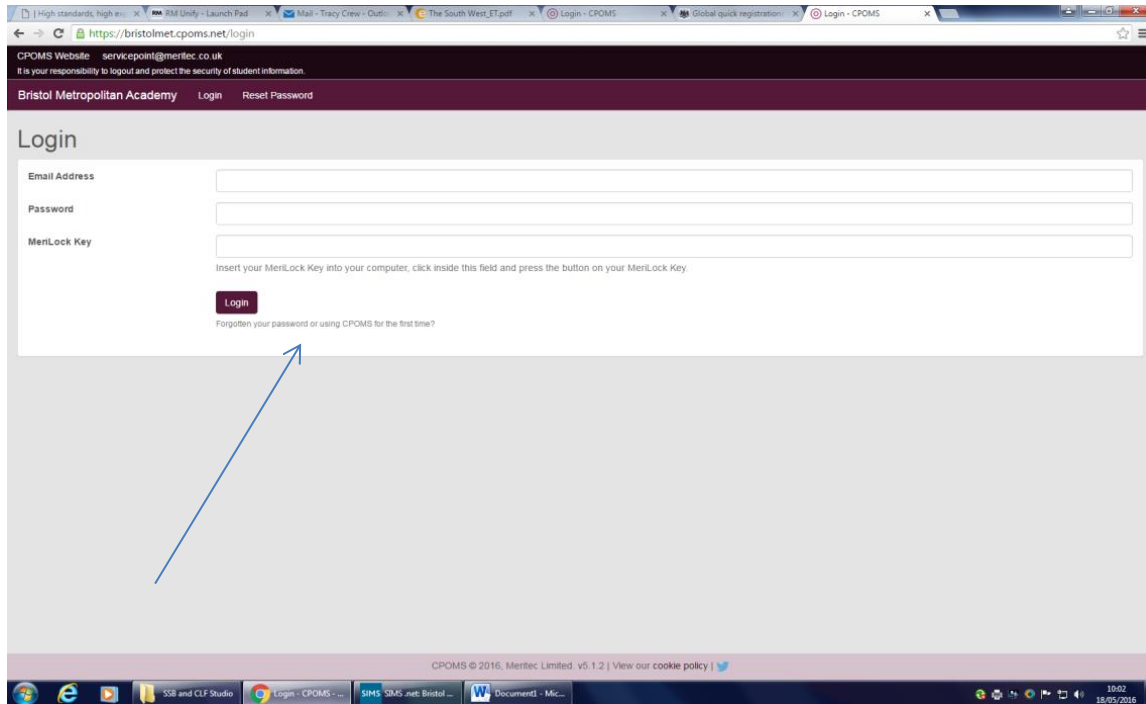


## Appendix 7: CPOMS

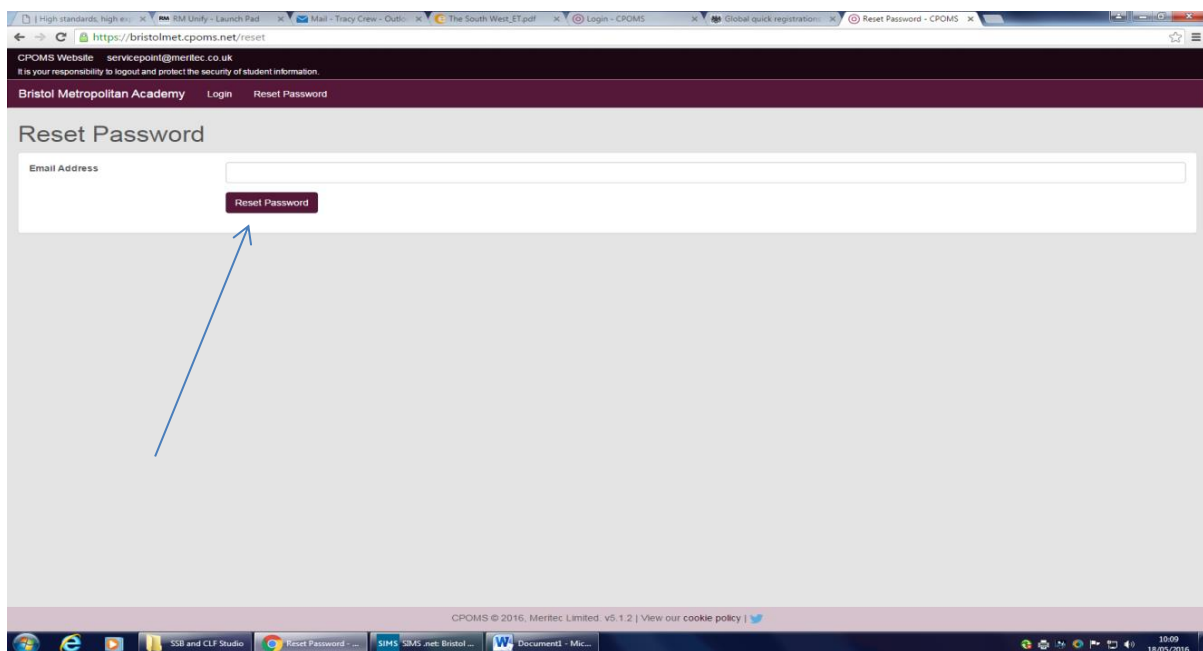
# CPOMS

## SIMPLE LOGGING ON INSTRUCTIONS

CPOMS can be accessed through the CPOMS Tab on your CLF Navigator Screen



If you have clicked on "***Forgotten your password***" or you are using ***CPOMS for the first time*** you will arrive at this screen.

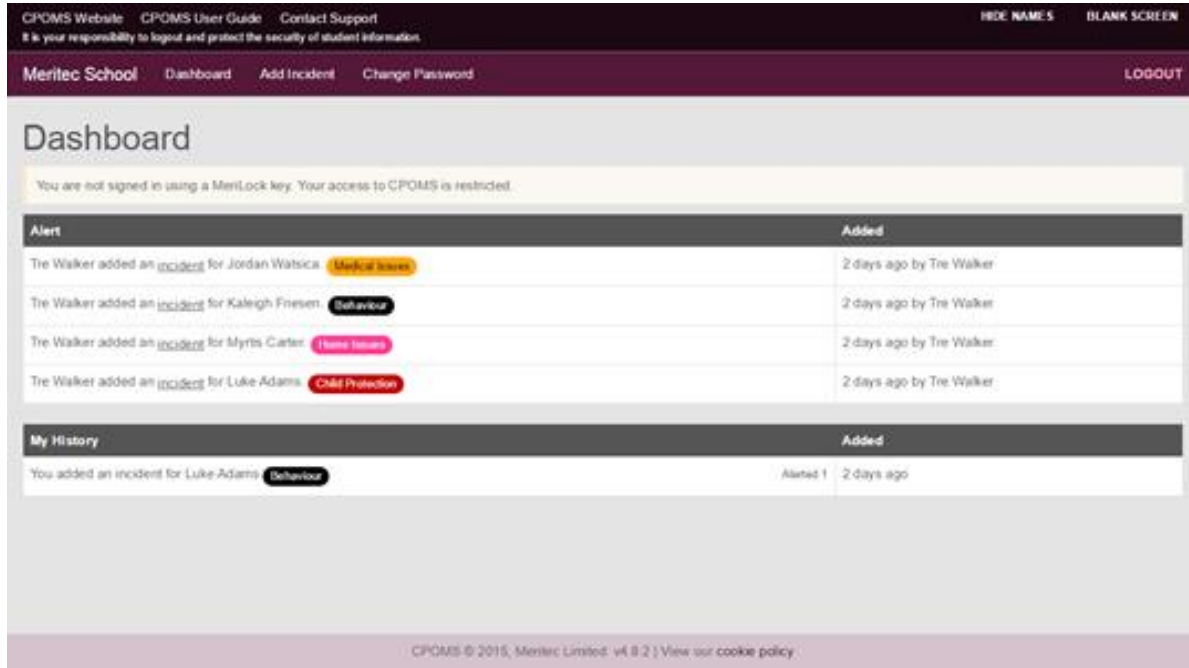


Type in your work email address (i.e., jbloggs@clf.uk) and click on **Reset Password**. An email will be sent to you with your new password.

Return to the original screen.

Enter your email address and password and click on **Login**.

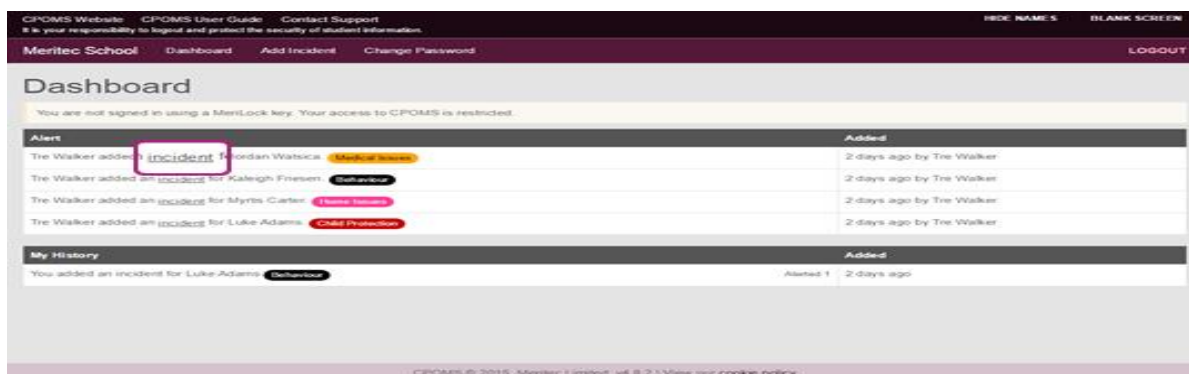
Your Dashboard will open.



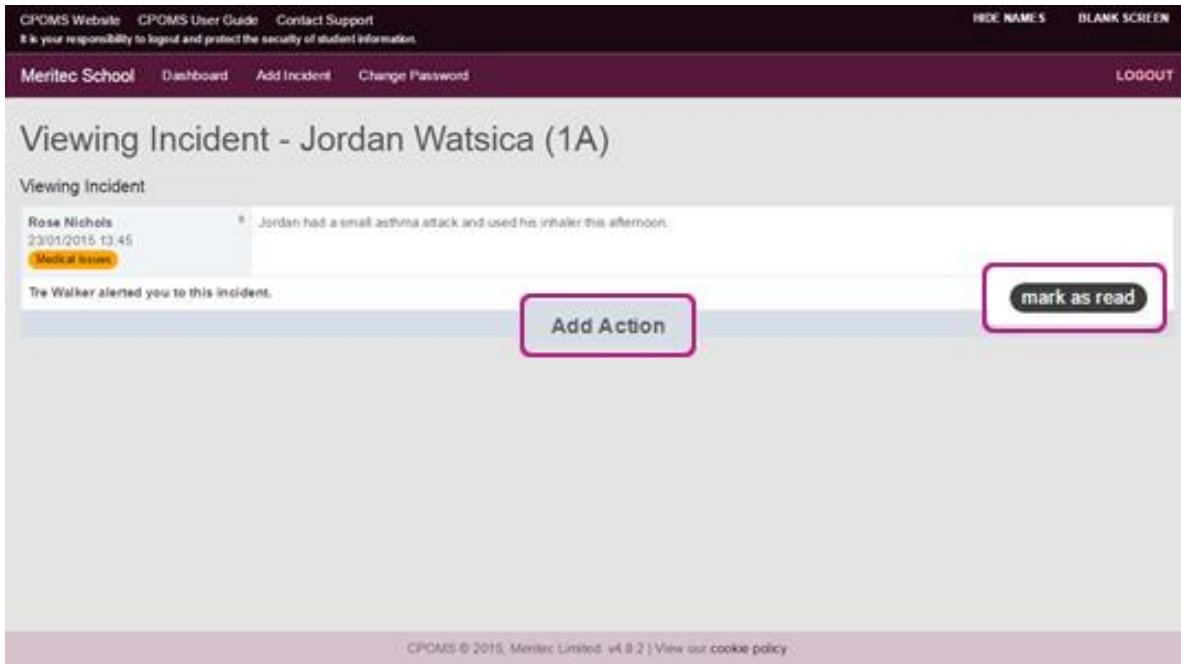
### **Restricted Access Dashboard**

With restricted access you will only be able to add incidents and view those that you have been alerted to, and therefore you do not require key access. When you are logged in without a key, you will be notified that: 'You are not signed in using a Meri Lock key. Your access to CPOMS is restricted.'

Once logged into the dashboard you will see your list of alerts. They again will tell you which member of staff has alerted you, which student the alert is for which category the incident falls under and finally when the incident alert was created. If you click on the word incident, you will be taken directly to view the incident. Once you have read the incident, you can mark as read to acknowledge that you have seen the incident and understand the content.

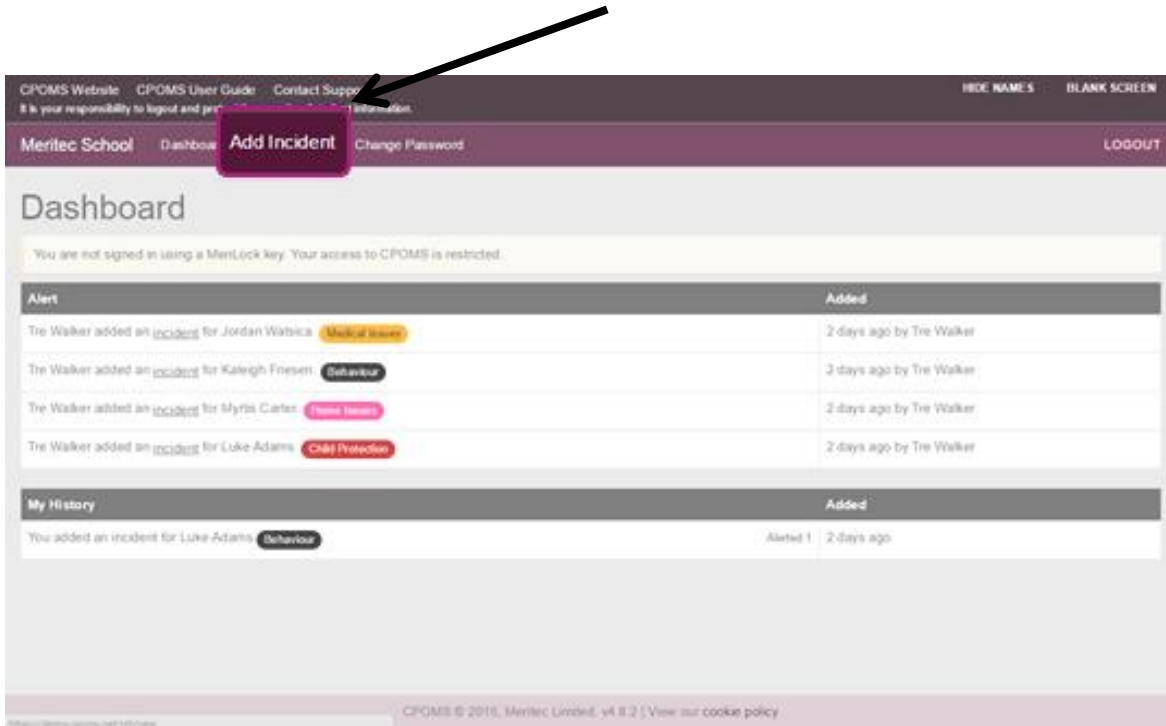


However, as you do not have key access, once you have marked as read, the alert will disappear from your alert's dashboard, and you will not be able to read it again **therefore if you are required to add any actions make sure to do this before you select the 'mark as read'**.



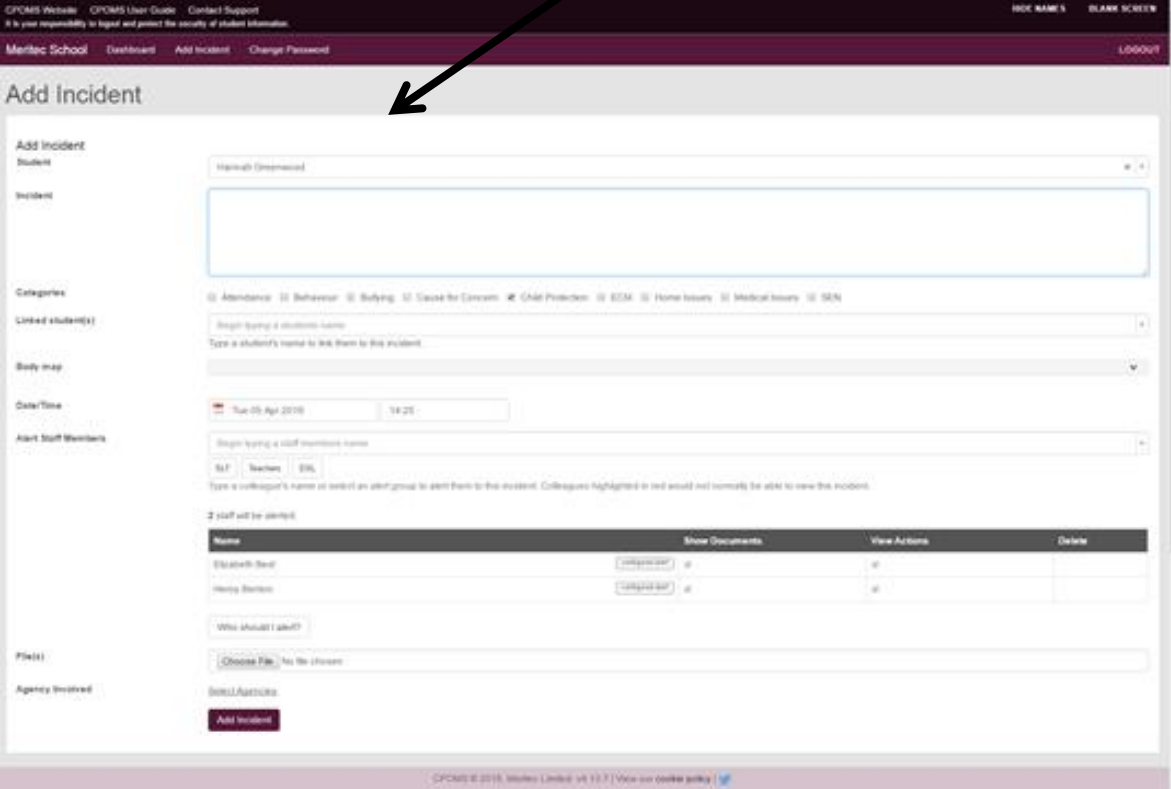
### Adding An Incident

To add an incident to the system, click on the **Add Incident** Link at the top of the screen.



This will take you to the incident page where you can proceed to fill in all the required information.

To select the child to whom you want to add the incident, begin typing the name in the student box at the top of the page. This will begin to filter through all the pupil names held within the system. Once you have selected a name, the box will turn grey.



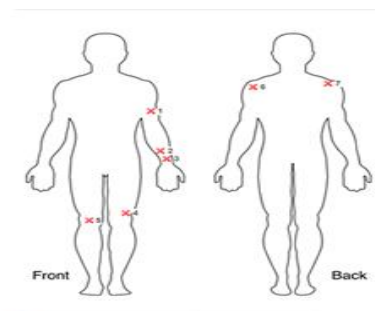
If you have selected the wrong name, click the delete button to choose an alternative.

Fill in the incident box with all of the details about the incident which you are adding. This is a free text box so you can add as much or as little as needed. Be careful to be accurate and specific, as once you submit the incident, you cannot delete it.

After you have filled in all of the details of the incident you need to select the **cause for concern category** to assign it to. **You do not add any other categories.**

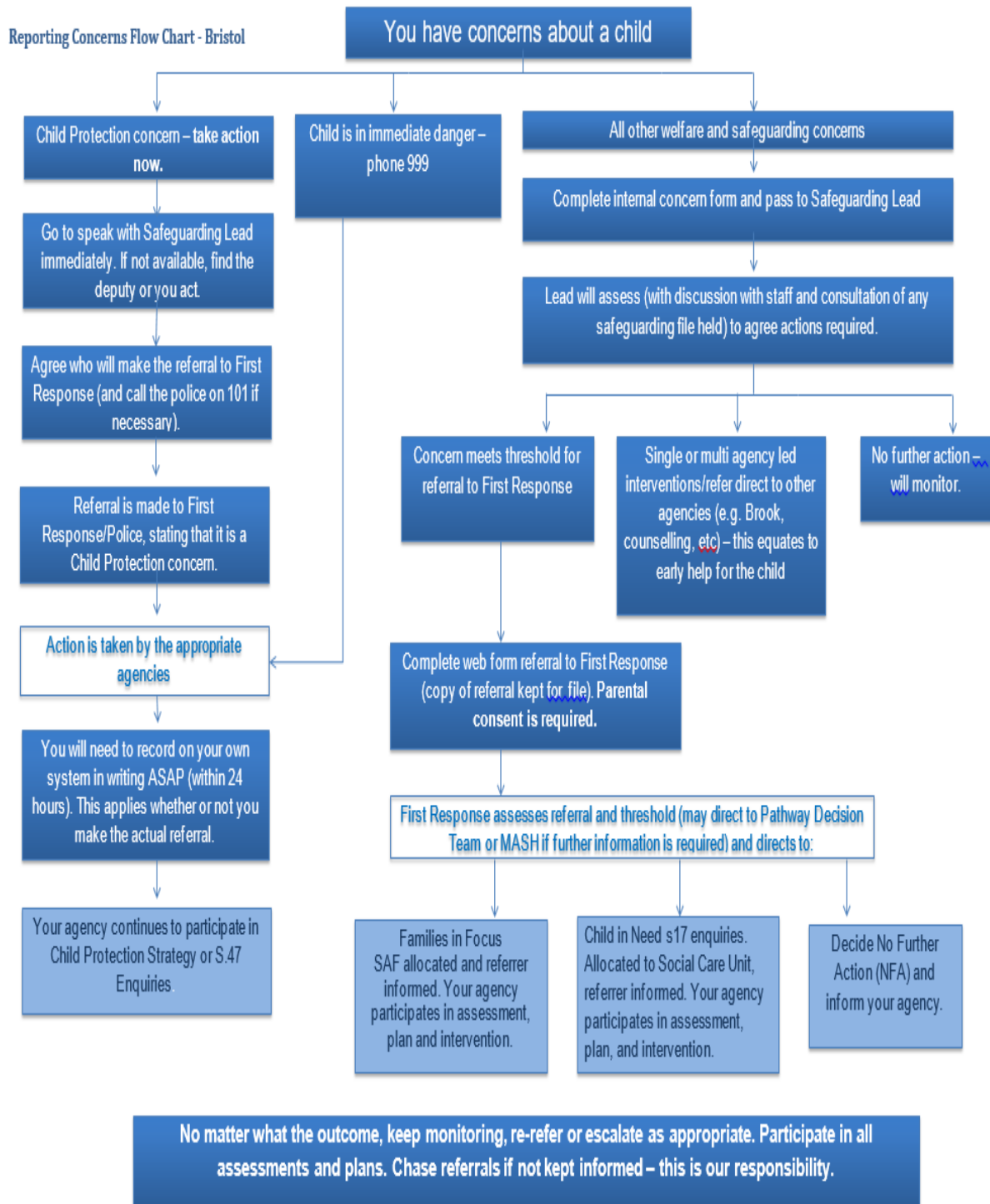
You can then choose to link in other students if more than one is involved in a particular incident. This will copy the incident to all pupils selected. You can also select to copy any documents added to the linked student.

The 'Body map' feature allows you to apply numbered markers to a body map image to support your incident text.



- Select a time and date. These will both default to the current time and date you are adding the incident however if you wish to change it to when the incident occurred you can do so here.
- Next you can choose which members of staff you wish to alert. Begin typing a name and CPOMS will filter through all CPOMS registered staff members. Alternatively, you can select to alert an entire user-group by choosing the specific tick box e.g., safeguarding team.
- If you want to upload a document to the incident e.g., social services letter, previous school case notes, meeting minutes etc. you can do so at this point. Select the browse button to find the relevant document on your pc and add as you would an email attachment.
- Lastly, you can add agency names to the incident to make others aware of which agencies are involved with this pupil.
- Once all this has been done you can select the **Add Incident button and submit**. This will then send email alerts to all the selected staff members telling them that they need to log into CPOMS to look at a newly added incident.

## Appendix 8: Referral Process



Multi-Agency Contacts for Safeguarding in Education

If you have concerns about a child/young person in Gloucestershire

If a child is at immediate risk call the police.	POLICE 999
To make an URGENT referral if a child is at risk of significant harm call children's social care	Gloucestershire Childrens Front Door 01452 426565
Out of Hours	Emergency Duty Team 01452 614194
To make a non-urgent referral contact the Childrens Front door by email	childrenshelpdesk@gloucestershire.gov.uk
To raise concerns or ask for advice about radicalisation.	Prevent Advice Line 0800 0113764
For advice whether to make a referral contact the Childrens Front Door on 01452780392	

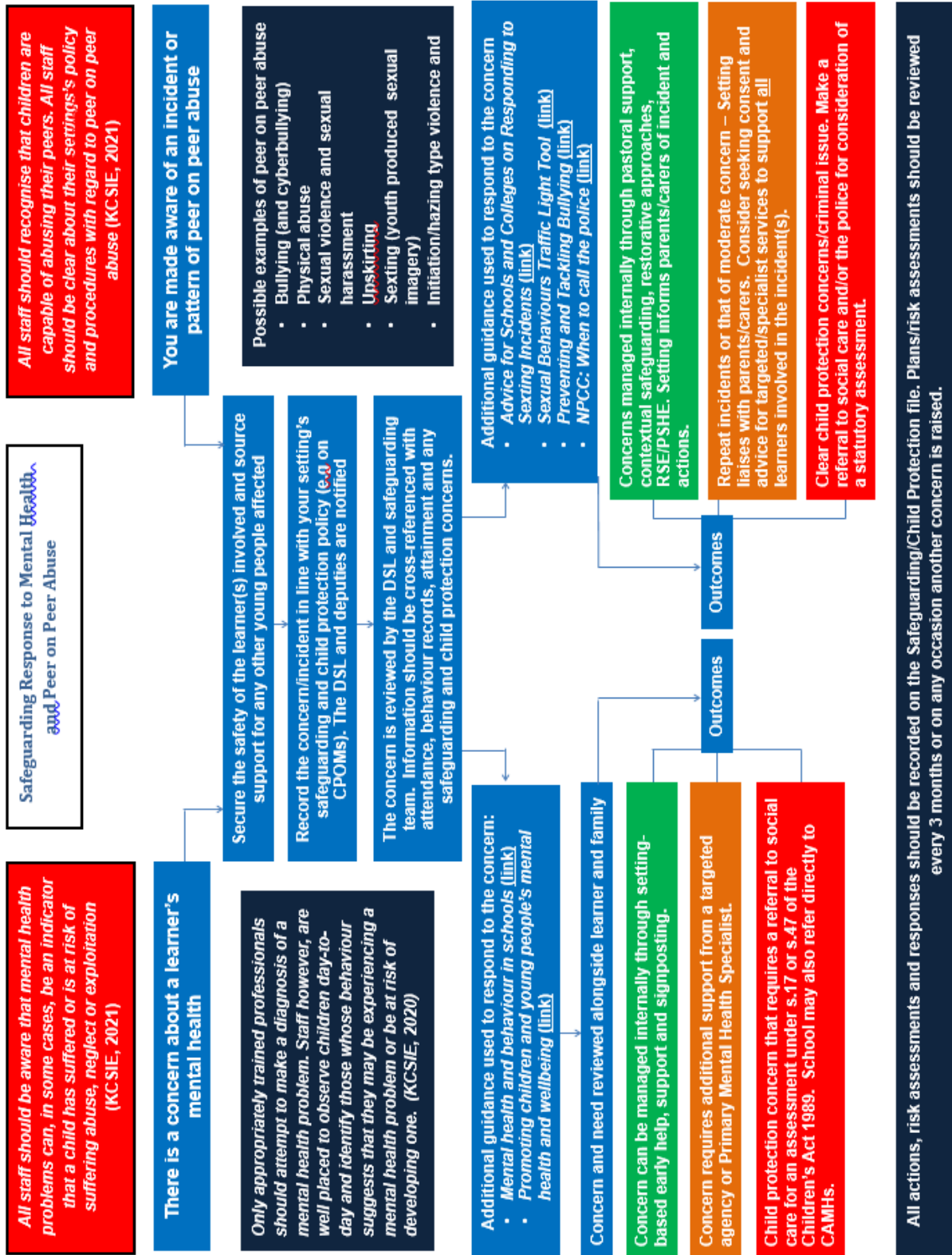
If you have concerns about a professional working with a child

To raise concerns and ask for advice on someone working with children in Gloucestershire	Gloucestershire LADO amadmin@gloucestershire.gov.uk
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For information and advice in relation to safeguarding policy and procedures

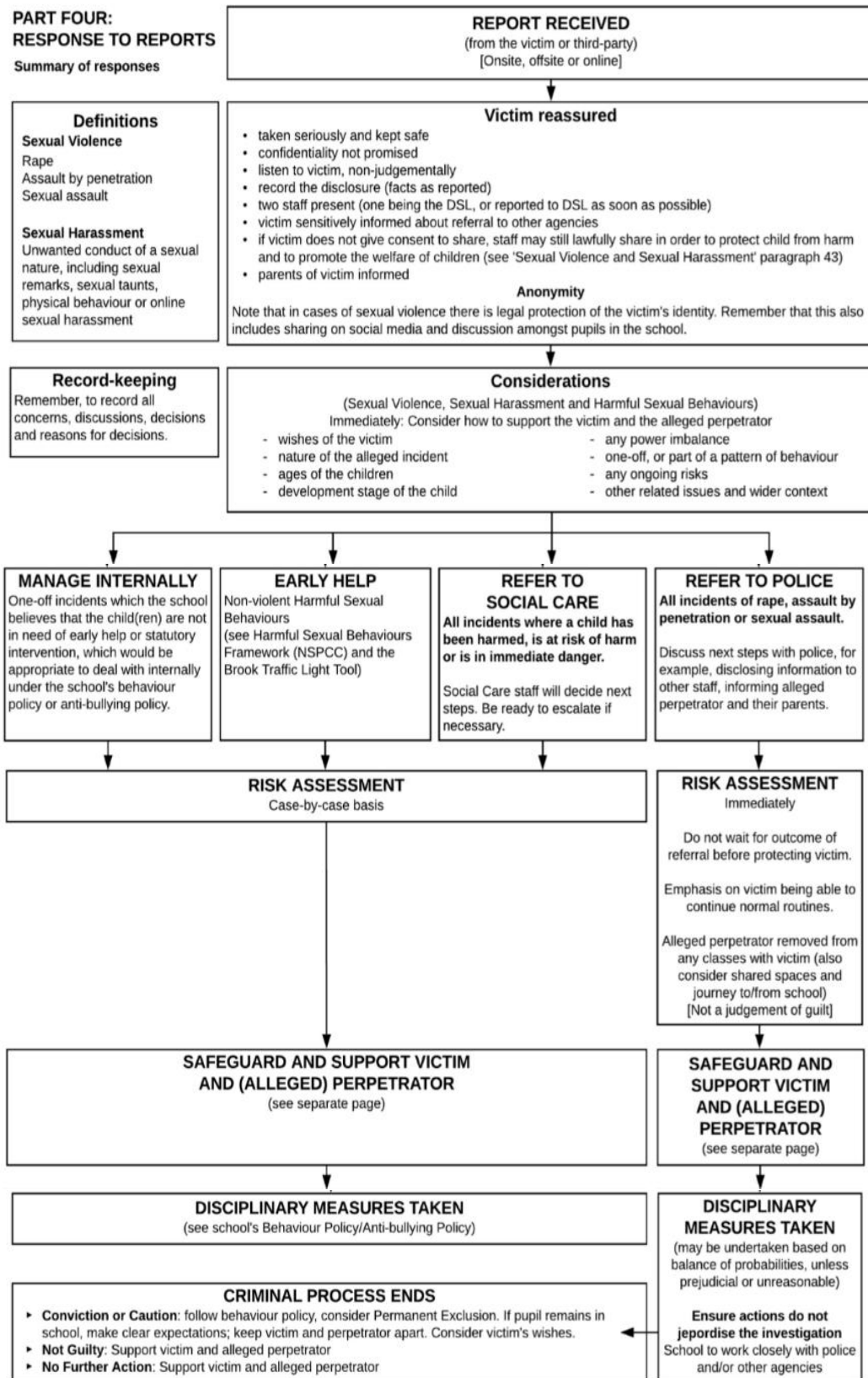
<p>Gloucestershire Safeguarding Children Partnership</p> <p><a href="https://www.ghll.org.uk/partnership-projects/safeguarding-children-in-gloucestershire/">https://www.ghll.org.uk/partnership-projects/safeguarding-children-in-gloucestershire/</a></p>
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## Responding to Mental Health and Child on Child Abuse





## Responding to reports of Sexual Violence and Harassment



## Appendix 9: Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm.

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

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 drugs and alcohol.
- 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 maintain them in education. 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.

Further information on signs of a child's involvement in sexual exploitation is available in-home Office guidance: Child sexual exploitation: guide for practitioners.

### 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 several locations including schools (mainstream and special), further and higher educational institutions, pupil 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.

Several 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); 25
- 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.

### **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. 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.

### **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](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### **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.

### **Serious Violence**

All staff should be aware of the indicators, which may signal that children are at risk from, or are involved in serious crime.

The indicators can include:

- Child withdrawn from family.
- Sudden loss of interest in school or change in behaviour. Decline in attendance or academic achievement (although it should be noted that some gang members will maintain a good attendance record to avoid coming to notice).
- Being emotionally 'switched off', but also containing frustration / rage.
- Starting to use new or unknown slang words.
- Holding unexplained money or possessions.
- Staying out unusually late without reason or breaking parental rules consistently.
- Sudden change in appearance - dressing in a particular style or 'uniform' similar to that of other young people they hang around with, including a particular colour.
- Dropping out of positive activities.
- New nickname.
- Unexplained physical injuries, and/or refusal to seek / receive medical treatment for injuries.
- Graffiti style 'tags' on possessions, schoolbooks, walls.
- Constantly talking about another young person who seems to have a lot of influence over them.
- Breaking off with old friends and hanging around with one group of people.
- Associating with known or suspected gang members, closeness to siblings or adults in the family who are gang members.
- Starting to adopt certain codes of group behaviour e.g., ways of talking and hand signs.
- Going missing.

- Being found by Police in towns or cities many miles from their home.
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past.
- Being scared when entering certain areas; and
- Concerned by the presence of unknown youths in their neighbourhoods.

### **Child on Child abuse**

Children can abuse other children. This is generally referred to as Child-on-Child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

### **Sexual violence and sexual harassment between children in schools and colleges**

Context Sexual violence and sexual harassment can occur between two children of any age and sex. 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and Lesbian, Gay, Bisexual and Transgender children are at greater risk. Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### **What is Sexual violence and sexual harassment?**

Sexual violence it is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003/19 as described below:

#### **Rape:**

A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

#### **Assault by Penetration:**

A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

#### **Sexual Assault:**

A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

### **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- sexual "jokes" or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence.
- sharing of unwanted explicit content.
- upskirting (is a criminal offence<sup>30</sup>).
- sexualised online bullying.
- unwanted sexual comments and messages, including, on social media; or sexual exploitation; coercion and threats.

### **The response to a report of sexual violence or sexual harassment**

The response to a report of sexual violence or sexual harassment. The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging, or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour.

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. If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 in Part one Keeping Children Safe in Education. As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy).

### **Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and 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.

### **Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. NICCO <https://www.nicco.org.uk/> provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **So-called ‘honour-based’ abuse (including Female Genital Mutilation 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.

### **Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers<sup>104</sup> that requires a different approach (see following section).

### **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.

### **FGM mandatory reporting duty for teachers**

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 pupils 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: <https://www.gov.uk/government/publications/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 deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance <https://www.gov.uk/guidance/forced-marriage> and Multi-agency guidelines, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG\\_MULTI\\_AGENCY\\_PRACTICE\\_GUIDELINES\\_v1\\_180614\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf) pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk).

In addition, since February 2023 it has also been a crime to carry out 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.

### **Preventing radicalisation**

Children may be susceptible to radicalisation into terrorism. 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 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 is the process of a person legitimising support for, or use of, terrorist violence.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.



Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. It is possible to protect people from extremist ideology 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.

### **The Prevent duty.**

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". 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 education settings should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments. The school or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Guidance on Channel can be found at <https://www.gov.uk/government/publications/channel-guidance>

### **Additional support**

The Government has published further advice for schools on the Prevent duty.

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.  
<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.  
[https://www.elearning.prevent.homeoffice.gov.uk/prevent\\_referrals/01-welcome.html](https://www.elearning.prevent.homeoffice.gov.uk/prevent_referrals/01-welcome.html)
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel. Educate

[https://www.elearning.prevent.homeoffice.gov.uk/channel\\_awareness/01-welcome.html](https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html)

**Against Hate**, is a government website designed to support schoolteachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

<https://educateagainsthate.com>

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. <https://preventforfeandtraining.org.uk/> This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed, and proportionate referrals.

### **Modern Slavery and the National Referral Mechanism**

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 the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

### **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. 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).

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

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.

## 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 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).

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

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK ([www.gov.uk](http://www.gov.uk)) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)

## Cybercrime

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 particular 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 National Cyber Security Centre - NCSC.GOV.UK

### Online Safety

The breadth of issues classified within online safety is considerable and can be linked to issues such as child sexual exploitation and radicalisation. Issues can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful material; for example, pornography, fake news, racist or radical and extremist views.
- **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams'

The school will ensure it is proactive in addressing online safety through:

- **Education** of pupils through the curriculum.
- **Keeping parents up to date** on how to support keeping their children safe online.
- **Reviewing online safety practices** as part of a whole school approach to online safety.
- **Filtering and monitoring** to protect users but not leading to unreasonable restrictions.
- **Staff training** which is integrated, aligned, and considered as part of the overarching safeguarding approach.
- **Information sharing** to enable the school community to be kept up to date.

### Hate Crime

Staff need to demonstrate a knowledge and understanding of Hate crimes which are any crimes that are targeted at a person because of hostility or prejudice towards that person's:

- Disability
- Race or ethnicity
- Religion or belief
- Sexual orientation
- Transgender identity

This can be committed against a person or property. The victim does not have to be a member of the group at which the hostility is targeted. In fact, anyone could be a victim of a hate crime.

## 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, this does not, and should not, replace a referral into 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.

(<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets> ) The new duties shift focus to early intervention and encourage 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. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation here.<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>