



Minerva
Learning Trust

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Child Protection and Safeguarding Policy 2021-2022

Date First Published	September 2020
Version	3
Last Approved	March 2022
Review	September 2022

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Changes to this edition

Version 2 - This policy has been updated in January 2022. It represents a significant re-write to previous versions and consolidates the previous policy and the separate appendix document.

1. Purpose

This policy sets out the Trust wide approach to Safeguarding and Child protection across all our schools and settings.

Our policy is underpinned by these key principles:

- The protection of children using national, local and school child protection procedures
- Working in partnership and playing an important role in multi-agency safeguarding arrangements as set out by Working Together 2018 (update September 2020)
- Everyone has a clear understanding regarding abuse and neglect in all forms and understands how to identify, respond and report it
- Everyone should feel confident that they can report any safeguarding concern to the school and that these will be dealt with in an appropriate manner
- A child-centred approach: a clear understanding of the needs, wishes, views and voices of children.

There are eight main elements to our policy:

- **Types of abuse:** The types of abuse that are covered by the policy
- **Signs of abuse:** The signs of abuse that that everyone should look out for
- **Reporting:** How to report a concern, who to go to within the school
- **Roles and responsibilities:** In relation to safeguarding
- **Process and procedures:** Expectations with regard to safeguarding
- **Training:** Expectations around training for staff, volunteers and governors
- **Safer recruitment:** Checks and procedures relating to recruitment
- **Implementation:** How the policy will be managed and have its delivery overseen.

2. Aims

Minerva Learning Trust (MLT), all its employees and volunteers, are committed to promoting the welfare of all children and young people. This policy reflects its responsibilities in ensuring all members of the Trust create a safe environment within which children and young people can learn.

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and trustees in the academy and is consistent with the procedures of the 3 safeguarding partners. These are the CCG (Clinical Commissioning Group), the Police and the Sheffield Safeguarding Children Partnership. Appropriate information sharing, in line with the data protection act and GDPR, across our safeguarding partners is key to the successful implementation of this policy.

3. Links to other documents and legislation

Trust policies:

- Behaviour policy
- (Staff) Code of conduct policy
- Complaints procedure
- Health and safety policy
- SEND policy
- Attendance policy
- Online safety policy
- Curriculum policy
- Children Looked After policy
- Whistleblowing policy
- Recruitment policy
- Record retention policy
- Low level concerns policy
- Managing allegations against staff

Other legislation and guidance:

This policy is underpinned and written in reference to the following guidance:

- The Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#).
- The arrangements agreed and published by our 3 local safeguarding partners.
- Section 175 of the [Education Act 2002](#)
- [The DfE Staffing and Employment Advice for schools which relates to The School Staffing \(England\) Regulations 2009](#)
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#)
- [The Children Act 1989](#) (and [2004 amendment](#))
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#) and [Statutory guidance on FGM](#)
- [The Rehabilitation of Offenders Act 1974](#)
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#)
- [Statutory guidance on the Prevent duty](#)
- [Statutory framework for the early year's foundation stage](#)
- KCSIE now applies to providers of post 16 education, including sixth form colleges, as set out [Education and Training \(Welfare of Children\) Act 2021](#).
- [Disqualification under the Childcare Act 2006](#)

This safeguarding policy also reflects Sheffield's agreed multi agency procedures that have been put in place by the three safeguarding partners. Sheffield Children Safeguarding Partnership have developed a comprehensive set of [policies](#) and these have been used to inform this policy.

4. Important Contacts

Below are the relevant Safeguarding contact details for << insert school name>> and other relevant safeguarding contacts.

Role/ Organisation	Name	Contact details
Designated Safeguarding Lead (DSL)		
Deputy DSL		
Other contactable DSL(s) and/or deputy DSL(s):		
Children Looked-After designated teacher		
Headteacher		
Local Authority Designated officer (LADO)	Andrew Adedoyin	0114 2734855, email lado@sheffield.gov.uk
Chief Executive Officer	Bev Matthews	07805247130 bevmatthews@minervalearningtrust.co.uk
Chair of Trust Board	Ed Wydenbach	ewydenbach@minervalearningtrust.co.uk
Chair of Local Governing Body		
Lead Local Governor - Safeguarding		
Lead Trustee for Safeguarding	Genny Bradley	gbradley@minervalearningtrust.co.uk
Chair of Minerva Learning Trust	Ed Wydenbach	ewydenbach@minervalearningtrust.co.uk
Sheffield Safeguarding Hub ¹		0114 2734855
Channel helpline (Prevent Strategy)		020 7340 7264 Counter.extremism@education.gov.uk
NSPCC	National Helpline	0808 800 5000
ChildLine	National Helpline	0800 11 11
Child Exploitation and Online Protection (CEOP)	National Helpline	0370 496 7622

5. Recognising signs of abuse

5.1 Children who may require early help

All staff, governors and volunteers, working within the academy should be alert to the potential need for early help for children, following the procedures identified for initiating early help using the local and current Sheffield Safeguarding Partnership Threshold.

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. Any child may benefit from early help, but all school/college staff need to be alert to the potential need for early help for a child/children who:

- Are disabled and have specific additional needs
- Have special educational needs
- Have English as an additional language
- Are a young carer
- Are looked after or previously looked after
- Are privately fostered
- Have returned home to their family from care
- Are showing signs of engaging in anti-social or criminal behaviour
- Are in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, and domestic violence
- Are showing early signs of abuse and/or neglect
- Are showing signs of displaying behaviour or views that are considered to be extreme
- Are misusing drugs or alcohol themselves
- Are not attending school or are at risk of exclusion from school
- Frequently go missing/goes missing from care or from home
- Are at risk of modern slavery, trafficking, exploitation, radicalised
- Has a mental health need
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Are at risk of FGM, sexual exploitation, or forced marriage
- Are asylum seekers
- Are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and the association with organized crimes groups or county lines
- Have a family member in prison or is affected by parental offending
- Are persistently absent from education, including persistent absences for part of the school day
- Are accessing alternative provision.

If early help is appropriate, the DSL 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 practitioner. Further information on the Sheffield procedure for Early help can be found [here](#).

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

5.2 Child Abuse

In relation to children, safeguarding and promoting their welfare is defined as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

For the purposes of this policy, "abuse" is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

There are four types of child abuse as defined in 'Keeping Children Safe in Education' (2021):

- **Physical Abuse** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional Abuse** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

- **Sexual Abuse** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.
- **Neglect** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff should be aware of the indicators of abuse and neglect, and that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSL(s), need to be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms).

Bullying and forms of bullying on- and off-line including prejudice based and cyber bullying is also abusive and will include at least one or more, of the defined categories of abuse above. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

Further information about different types of abuse is provided in the sections below.

5.3 Specific Safeguarding Issues

There are specific issues that have become critical issues in safeguarding. The school will endeavour to ensure their staff, governors and volunteers are familiar with these issues, namely:

- Bullying including cyber bullying
- Child Sexual Exploitation (CSE) and as defined by Working Together 2018 (Update September 2020)
- Children at risk of criminal exploitation (CRE) as defined by local safeguarding partnership procedures
- Domestic Violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and Youth Violence
- Gender based violence/Violence against women and girls (VAWG)
- Hate
- Mental Health
- Private Fostering
- Preventing Radicalisation
- On line abuse/Sexting
- Teenage Relationship abuse
- Trafficking
- Missing children and vulnerable adults
- Child sexual abuse within the family
- Poor parenting, particularly in relation to babies and young children

The school has a zero-tolerance approach to abuse, including peer-on-peer abuse.

5.4 Physical Abuse

Most children will collect cuts and bruises and injuries, and these should always be interpreted in the context of the child's medical / social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given; these can often be visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks.
- Multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour
- Running away from home.

5.5 Emotional Abuse

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow, however, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress

5.6 Sexual Abuse

It is recognised that there is underreporting of sexual abuse with in the family. All staff and volunteers should play a crucial role in identifying / reporting any concerns that they may have through, for example, the observation and play of younger children and understanding the indicators of behaviour in older children which may be underlining of such abuse.

All staff and volunteers should be aware that adults, who may be men, women or other children, who use children to meet their own sexual, needs abuse both girls and boys of all ages. Indications of sexual abuse may be physical or from the child's behaviour. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adult

5.7 Neglect

It can be difficult to recognise neglect, however its effects can be long term and damaging for children. Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing.

The physical signs of neglect may include:

- Being constantly dirty or 'smelly'.
- Constant hunger, sometimes stealing food from other children.
- Losing weight, or being constantly underweight.
- Inappropriate or dirty clothing.

Neglect may be indicated by changes in behaviour which may include:

- Mentioning being left alone or unsupervised.
- Not having many friends.
- Complaining of being tired all the time.
- Not requesting medical assistance and/or failing to attend appointments.

5.8 Sexual violence and sexual harassment

For the purposes of this policy, "consent" is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

Sexual violence refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their 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 they intentionally penetrate the vagina or anus of another person (B) with a part of their 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 they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Up skirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

For the purposes of this policy, "up skirting" refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Up skirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of up skirting.

For the purposes of this policy, the "consensual and non-consensual sharing of nude and semi-nude images and/or videos", colloquially known as "sexting", is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, "indecent imagery" is defined as an image which meets one or more of the following criteria:

- | | |
|---|---|
| • Nude or semi-nude sexual posing | • Any sexual activity involving a child |
| • A child touching themselves in a sexual way | • Someone hurting a child sexually |
| | • Sexual activity that involves animals |

6. Specific Safeguarding Issues

The school will incorporate the signs of abuse and specific safeguarding issues on safeguarding into briefings, staff induction training, and ongoing development training for all staff and anyone who has contact with a child or young person including governors, supply teachers and volunteers. We will also access government guidance, local procedures, strategies and tools through the Sheffield Safeguarding Children Partnership.

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

6.1 Prevent Duties

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

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

The school will ensure all staff including governors and volunteers need to be aware of extremism, including the signs of it, alerts to concerning behaviours, and ideologies considered to be extreme. They need to have an understanding of the British Values agenda and adhere to their duties in the Prevent guidance 2015 to prevent radicalisation. The Headteacher will:

- Establish or use existing mechanisms for understanding the risk of extremism;
- Ensure staff understand the risk and build capabilities to deal with issues arising through delivery of regular training and updates
- Communicate the importance of the duty
- Provide appropriate and sufficient training on the Prevent duty
- Ensure all staff (including governors and volunteers) implement the duty.

The school will respond to any concern about Prevent as a safeguarding concern and will report in line with the school's safeguarding reporting procedures This may include a referral into [Channel](#) using the case pathway process. We will seek to work in partnership, undertaking risk assessments where appropriate and proportionate to risk, building our children's resilience to radicalisation. We will use the relevant forms to record any concerns, keeping records which will be treated as a Child Protection Record, storing them as appropriate.

6.2 Child Sexual Exploitation (CSE) & Children at Risk of Exploitation (CRE)

CSE is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will also recognise that pupils may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

We recognise this is relevant to both boys and girls. Risk factors may include; going missing, staying out unusually late

- Engagement in offending
- Disengagement from education
- Using drugs or alcohol
- Unexplained gifts/money
- Overly secretive
- Repeat concerns about sexual health
- Decline in emotional wellbeing
- Unexplained Absence from school
- Association in gangs
- Unexplained injuries
- Carrying weapons, access to or carrying unusual number of mobile phones

All suspected or actual cases of CSE/CRE are a safeguarding concern in which child protection procedures will be followed; this will include a referral to the police. If any staff are concerned about a pupil, they should refer to the Designated Safeguarding Lead/s within the school.

6.3 Child criminal exploitation (CCE) / Serious Violence

Children and young people involved with gangs and criminal exploitation need help and support. This can include those involved in serious violent crime. They might be victims of violence or pressured into doing things like stealing or carrying drugs or weapons. They might be abused, exploited and put into dangerous situations.

For the purposes of this policy, "child criminal exploitation" is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

"County lines" refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

Signs which may indicate criminal exploitation:

- Persistently going missing from school or home and / or being found out-of-area
- Unexplained acquisition of money, clothes, or mobile phones or unexplained injuries
- Excessive receipt of texts /phone calls
- Relationships with controlling /older individuals or groups or changes in relationships
- Leaving home / care without explanation
- Suspicion of physical assault /unexplained injuries
- Parental concerns
- Carrying weapons

- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

More specific indicators that a pupil may be involved in county lines include:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owning a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Criminal exploitation of children is a safeguarding concern and will require a discussion with the DSL who will seek advice from agencies and professionals. This will mean a referral into the Police and Social Care.

6.4 Carrying knives/offensive Weapons & Gang Culture

Children bringing and carrying a knife/offensive weapon onto the school premises is a criminal offence and immediate action will be taken by calling the Police **and informing the CEO**. The guidance on 'Searching, Screening and Confiscation for Headteachers, schools and Governors, January 2018' will be consulted and we will consider and may apply the appropriate actions set out in the school's behaviour policy.

If a member of staff suspects a pupil/student being involved in gang culture, this is a safeguarding concern and will require a discussion with the DSL who will seek advice from agencies and professionals including reference to the safeguarding procedures as outlined by the local authority.

6.5 The sending of indecent images from one person to another through Digital Media Devices

The school recognises this as a safeguarding concern for all of our children. There are examples of children of all ages sending and receiving indecent images through digital media. There is a growing use of social media across school and children must be supported if they receive any such images.

In the event of such a safeguarding concern, we will seek advice from agencies and professionals acknowledging that there are both national and local guidance that we need to adhere to. We will respond by working closely with parents and carers. We will teach children about this aspect of safeguarding through online safety lessons. These are linked to our RSE and online safety policies and PHSE curriculum.

We will refer to:

- "Sexting in Schools & Colleges: Responding to incidents & safeguarding young people" UK Council for child internet safety
- The DfE guidance 2018 on Searching Screening and Confiscation Advice for Schools
- The DfE guidance, June 2019 on Teaching Online Safety in Schools

6.6 Female Genital Mutilation (FGM) and 'Honour-Based' Abuse (HBA)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

Female Genital Mutilation (FGM)

"Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons." (World Health Organisation, 2016)

FGM has been an embedded practice for centuries in some countries in the world including Africa, the Middle East, Iran, Iraq, Oman, the United Arab Emirates, the Occupied Palestinian Territories, India, Indonesia, Malaysia and Pakistan (DH, 2015).

The World Health Organisation estimated that between 100 to 140 million women and girls worldwide have undergone FGM, but prevalence of FGM in the UK is difficult to estimate because of the hidden nature of the crime.

All suspected or actual cases of FGM are a safeguarding concern and safeguarding procedures will be followed. This will include a referral to the police. If any staff are concerned about a pupil, they will refer to the Designated Safeguarding Lead/s within the School before reporting the concern directly to the Police.

It is a mandatory reporting duty for all teachers to directly report to the police where it is believed an act of FGM has been carried out on a girl under 18 in the UK. Failure to do so may result in disciplinary action being taken.

There are 4 types of FGM, mainly carried out on girls between the ages of five and ten. In some countries it is practised on babies as young as two or three days old and in other areas, it is practised prior to marriage or as part of the wedding rituals.

It is the parent's decision as to whether their daughters are 'cut', but they face tremendous pressure from older members of their families, especially, if they return to their country of origin. In most countries, including the UK, FGM is illegal.

Signs may include:

- Being repeatedly absent from school or absent for a prolonged period
- Not participating in Physical Education
- Unauthorised and or extended leave, vague explanations or plans for removal of a female in a high risk category (parents from a country who are known to practice FGM) especially over the summer period
- Plans to take a holiday which may be unauthorised, unexplained or extended in a country known to practice FGM
- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating, or having frequent urinary, menstrual or stomach problems
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations

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

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

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them. If a member of staff suspects that a pupil is being forced into marriage, they should speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will: speak to the pupil about the concerns in a secure and private place, activate the local safeguarding procedures and refer the case to the local authority's designated officer, seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk, refer the pupil to an education welfare officer, class teacher, learning mentor, or member of the leadership team as appropriate.

6.7 Allegations of abuse against other children/Peer on Peer abuse

We recognise that some children abuse other children or their peers and the reasons for this are complex and are often multi-faceted. Peer-on-peer abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. We understand that we need as a school to have clear mechanisms and procedures in place to identify and report incidents or concerns. We have a zero tolerance approach to peer on peer abuse and aim to eliminate such conduct.

Peer on peer abuse is a safeguarding concern and normal procedures will be followed. We will consider and may apply the disciplinary procedure outlined in the school's behaviour for learning policy. We will offer support to a victim.

We recognise peer on peer abuse can take many forms:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Up skirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

We will challenge this type of abuse and will use the curriculum to address and tackle peer on peer abuse. Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

6.8 Mental Health of Children and Young People

It is important that staff understand that children’s vulnerabilities related to mental health may be that they could be more likely to be impacted by other safeguarding concerns. When making referrals, the child’s mental health should be shared.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps outlined in section 5.

If staff have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action. There are a range of support mechanisms in the school to support students with their mental health. Significant concerns will be referred to their GP or directly to CAMHS. Staff should not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional.

6.9 Children Missing in Education

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

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

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

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

6.10 Pupils with special educational needs or disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can 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.

We are mindful of these additional challenges, and where required, will provide extra pastoral support for children with SEN and disabilities. Staff need to be aware of the additional challenges faced by those with SEN or disabilities.

6.11 Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Older children may also experience domestic abuse and/or violence in their own personal relationships. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff need to be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the DSL) before the child or children arrive at academy the following day. The DSL will provide support according to the child's needs and update records about their circumstances. It is likely that in this instance, Operation Encompass will contact the school.

6.12 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures). Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

6.13 Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and in line with school procedures. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and improvement officers, will be asked to show photo ID and will be asked to confirm their DBS clearance; or the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

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

6.14 Children looked-after and previously children looked-after

The most common reason for children becoming looked after is as a result of abuse and/or neglect. We are also aware that a previously looked-after child potentially remains vulnerable and this requires staff to have the skills, knowledge and understanding to keep them safe. We understand that all agencies must work together and take prompt action on concerns to safeguard these children, who are a particularly vulnerable group. The school will also ensure that care leavers are supported with pathways including liaison with the local authority where a personal advisor will be appointed.

Section 4 to 6 of the Children and Social Work Act 2017 states designated teachers will have the responsibility for promoting the educational achievement of those who have left care. The virtual school head at the local authority manages the pupil premium plus grant for children looked-after. The designated teacher should work with the virtual school head to discuss how funding can be best used to support the progress of the children looked-after in the school and meet the needs identified in each child's personal education plan. The designated teacher should also work with the virtual school head to promote the educational achievement of previously children looked-after. Statutory guidance on promoting the education of children looked-after contains further information on the roles and responsibilities of virtual school heads.

6.15 Children with family members in prison and part of the court system

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. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. A guide for 5-11 year olds explains each step of the process and the support and special measures that are available. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families, including for the children involved. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service.

6.16 Parental alcohol and drug use

Parents' dependent alcohol and drug use can negatively impact on children's physical and emotional wellbeing, their development and their safety. The impacts on children include:

- physical maltreatment and neglect
- poor physical and mental health
- development of health harming behaviours in later life, for example using alcohol and drugs and at an early age, which predicts more entrenched future use
- poor school attendance due to inappropriate caring responsibilities
- low educational attainment
- involvement in anti-social or criminal behaviour

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

6.17 Other vulnerable groups

Home Educated Children can be more vulnerable than other children and with regard to the motivations of the intention to home educate. The school has a responsibility to those who are thinking about or who are about to home educate, including those who have been removed from the school roll with a view to home educate.

Young carers can be more vulnerable or placed at risk. It is important to identify young carers and ensure they are supported to help reach their potential with an understanding that the school will need to refer into early help social care services for an assessment of their needs.

Private fostering occurs when a child is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. The schools has a duty to notify the local authority if it is thought or known that a child or young person may be Privately Fostered or subject to a host family arrangement which is unclear or ambiguous.

6.18 Use of the school premises for non-school activities / extra-curricular activities

Where the school hires out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

Where the school provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The school will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs need to be aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff need to understand how they should respond to child protection concerns and how to make a referral to social care or the police, if necessary.

6.19 Non-collection of children

If a child is not collected at the end of the session/day:

- A check will be made for information about changes to the normal collection routines
- Reasonable attempts will be made to contact: parents, carers or others with parental responsibility at home or at work or other adults authorised to collect the child or vulnerable young person from the setting
- The child or vulnerable young person will not leave the premises with anyone other than parents, carers, others with parental responsibility or other authorised person
- If no-one can be contacted to collect the child or vulnerable young person after one hour, the Sheffield Safeguarding Hub or Police will be contacted
- The child or vulnerable young person will stay at the setting in the care of two staff members until safely collected either by the parent, carer, a person with parental responsibility, other authorised person, social worker or police officer
- Staff should never take the child or vulnerable young person home with them or provide a lift to them in their own car etc.

A full written report of the incident and outcome must be recorded on CPOMs.

7. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Governors in Minerva Learning Trust and each school within it and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities and online activities. Specific responsibilities at all areas of the organisation are highlighted below.

7.1 Minerva Learning Trust Board

- Appoint a Trust Board member as the Lead Trustee for Safeguarding who will create effective links and lines of communication between Trust central staff, and Local Governing Body Lead Governors for Safeguarding
- Ensure that the Trust has an appropriate Safeguarding and Child Protection Policy in place which provides overarching guidance upon which each school's Safeguarding Policy is written
- Ensure that the Safeguarding and Child Protection policies of the Trust and each individual school are reviewed and published annually
- Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to
- Review findings of the annual external safeguarding audit of all schools within the Trust to ensure compliance to Trust and statutory guidelines

7.2 Trust Board Safeguarding Lead Trustee

The Minerva Learning Trust Lead Trustee will work with the Lead Local Governor in each school to ensure that:

- Safeguarding practices, policies and procedures are in place across the Trust and that schools are fully compliant and meeting statutory requirements.
- Lead Local Governors are responsible for working with headteachers to ensure that their school is fully compliant
- The Lead Local Governor and Lead Trustee reporting schedule, the Trust Scheme of Delegation, Trust Governance handbook and Trust Governance Business planner state clearly the responsibility of the Lead Safeguarding Trustee within MLT

7.3 The Chief Executive Officer

- Ensure that each school within the Trust has an appropriate Safeguarding and related policies in place which links to the Trust's and the relevant Local Authority Safeguarding Children Board's overarching safeguarding expectations
- Ensure that staff are aware of how and when to act on concerns and that they always work in a safe and appropriate manner
- Ensure staff are updated on Keeping Children Safe in Education guidance through delivery of annual safeguarding training for all staff and sign to say they have read and understood Part 1 of the guidance
- Ensure each school has an identified and appropriately trained Designated Safeguarding Lead (DSL) in place and that the relevant training is up to date
- Facilitate an annual external safeguarding audit of all schools within the Trust to ensure compliance to Trust and statutory guidelines.

7.4 The Local Governing Body

- The governing board will approve the school's policy at each review, ensure it complies with the model Trust level policy and hold the Headteacher to account for its implementation
- An individual member of the Local Governing Body should be designated as the school's Lead Governor for Safeguarding. The Lead Governor for Safeguarding will champion issues to do with safeguarding and child protection within the school, liaise and meet with the DSL, conduct relevant school visits and provide relevant information and reports to the Local Governing Body at least twice per year
- The governing board will appoint a Lead Governors to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- All Governors will read Keeping Children Safe in Education part 1.

7.5 The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- Ensure that all children and young people know there are adults in the school whom they can approach if they are worried or are in difficulty
- Include curriculum activities and opportunities which equip children with the skills they need to stay safe from abuse and develop resilience
- Ensure every effort is made to create effective working relationship with parents, carers and other agencies
- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding and child protection, including online safety policy, as part of their induction
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- A designated member of staff is in place for Children Looked After and those post-CLA
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

Notifying the CEO, by telephone or email, within 24 hours of any of the following:

- Receipt of any safeguarding related complaint made to Ofsted or directly to the school
- Any serious safeguarding incidents that have been escalated to external authorities which may bring the school/Trust into the media spotlight
- Any incident for which the School's Critical Incident Plan may need to be implemented

7.6 The Designated Safeguarding Lead (DSL)

- The DSL is a member of the senior leadership team. Our DSL is [name/job title of individual]. The DSL takes lead responsibility for child protection and wider safeguarding.
- [delete as appropriate if not an early year's provider] Our Under 5's Safeguarding Lead is [name / job title]
- Insert details of how your DSL can also be contacted out of school hours, if necessary, e.g., email, phone.
- When the DSL is absent, the [deputy/deputies] – [name(s) or job title(s) of deputy/deputies] – will act as cover.

- If the DSL and [deputy/deputies] are not available, a member of the School Leadership Team will act as cover (for example, during out-of-hours/out-of-term activities or in exceptional circumstances).

The DSL or deputy will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters (including online safety)
- Refer suspected cases, as appropriate, to the relevant body
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Provide information to the Trust, LGB and local authority safeguarding partners
- The DSL will also keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Conducting new staff safeguarding inductions
- Maintaining and monitoring child protection records and acting upon concerns where necessary and appropriate.

7.7 All staff

All staff will read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues
- All staff will understand what constitutes sexual harassment and sexual violence and will have a clear understanding of the school systems and processes to deal with this. All reported incidents will be taken seriously.

8. Reporting concerns and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

8.1 If a child is suffering or likely to suffer harm, or in immediate danger

A referral should be made to the DSL if anyone believes a child is suffering or likely to suffer from harm, or in immediate danger. The DSL should immediately inform children’s social care and/or the police. In emergency situations, if the DSL or Headteacher is not immediately available then **anyone can make a referral by calling *the Police or Sheffield Safeguarding Hub (0114 2734855)***.

If an emergency referral is made by an individual they must ensure the DSL is informed as soon as possible. Follow the Sheffield procedure for making a referral. Further information on how to report abuse is available here. If it is appropriate to refer the case to local authority children’s social care or the police, the DSL will make the referral or support you to do so.

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

If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

8.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

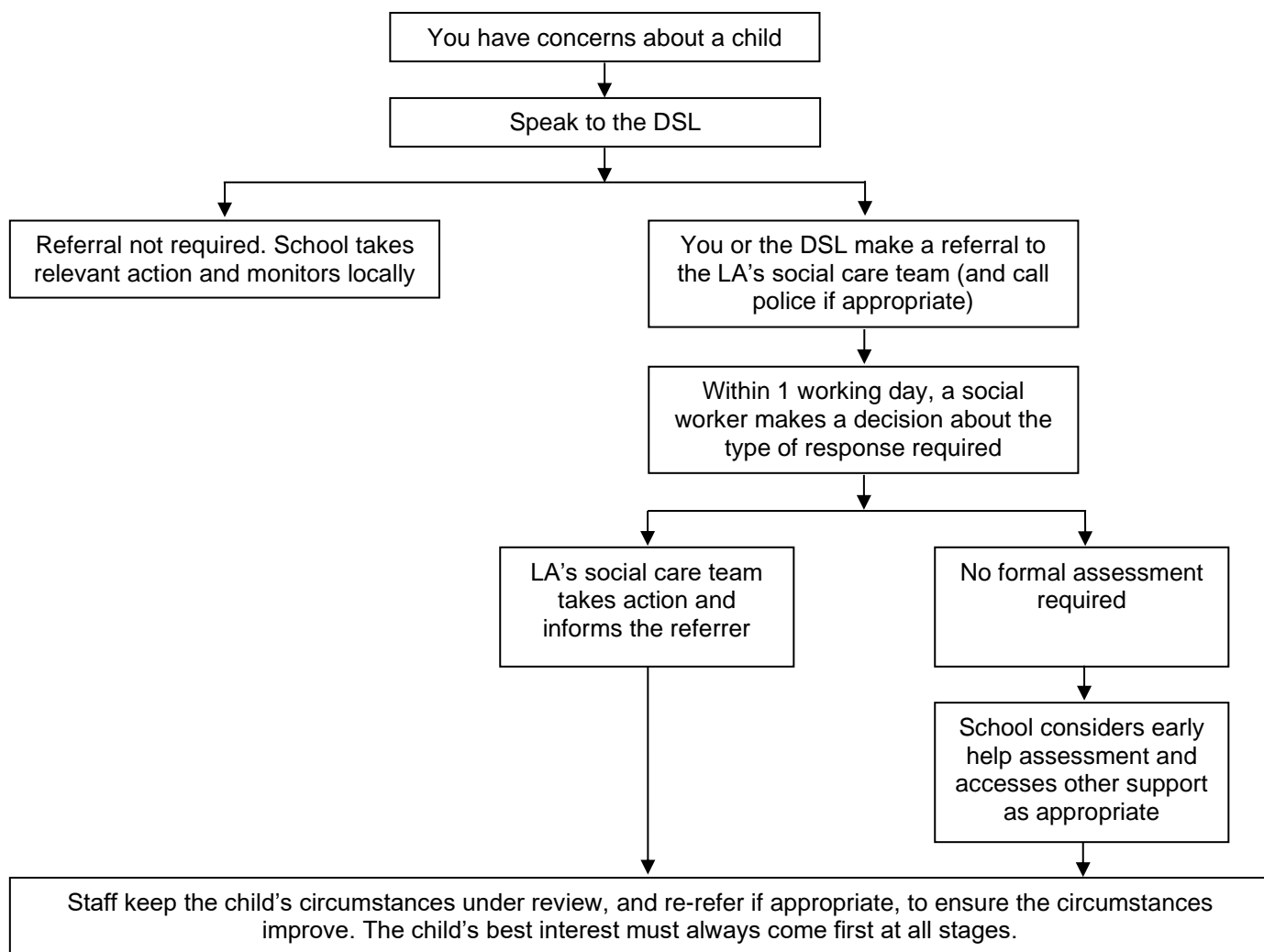
- Listen to and believe them. All disclosures and reports must be taken seriously.
- Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly, and tell the DSL as soon as possible that you have done so

8.3 If you have concerns about a child

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger):

- Follow Sheffield procedure for referring your safeguarding concerns.
- Where possible, speak to the DSL first to agree a course of action.
- If the DSL is not available, this should not delay appropriate action being taken. Speak to a deputy DSL, or member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL (or deputy) as soon as practically possible.
- Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ below). Share any action taken with the DSL as soon as possible.
- [insert school processes /procedures for reporting any safeguarding concerns]

Figure 1: procedure if you have concerns about a child’s welfare (no immediate danger)



8.4 Consensual & non-consensual sharing of nude and semi-nude images & videos (Sexting)

This approach based on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders and the Sheffield Children Safeguarding Partnership Online Safety, Sept 21

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately. You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

8.5 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a **risk of harm** to children, speak to the Headteacher immediately.

Staff will have met the **harm threshold** if they have:

- Behaved in a way that has harmed a child, or may have harmed a child (or young person)
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved/may have behaved in a way that indicates they may not be suitable to work with children.
- The Headteacher/Chief Executive Officer will then follow the procedures and process checklist set out in Sheffield Children Safeguarding Partnership Allegations & concerns about staff & volunteers in education settings, Sept 21.
- Allegations should be responded to quickly, fairly and consistently, protecting the child or young person whilst supporting the person subject to the allegation.
- The LADO and case manager should systematically record the allegations detailing all decisions and actions.
- Procedures for dealing with allegations will be applied with common sense and judgement.
- Staff should refer to the Allegations & concerns about staff and volunteers process checklist which can be found in the above Sheffield policy.

- **If the concerns/allegations are about the Headteacher, individuals must report this directly to the Chief Executive Officer.**
- **If the concerns/allegations are about the Chief Executive Officer, individuals must report this directly to the Chair of the Trust Board**

Concerns that do not meet the 'harm threshold'

Low-level concerns about adult behaviour are those that do not meet the 'harm threshold' above but are not insignificant. They often cause a sense of unease or a 'nagging doubt'. e.g., behaviour that is:

- inconsistent with staff code of conduct, including outside work
- over friendly with children
- having favourites
- taking photographs of children/young people on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language

Such behaviour can appear inadvertent, thoughtless, or inappropriate, or intend to enable abuse. Concerns may arise from a:

- suspicion or complaint
- disclosure made by any child, parent, or other adult
- as a result of vetting checks

The school will ensure the staff codes of conduct; behaviour policy and safeguarding policies and procedures are implemented effectively, and that appropriate action is taken to deal with any concern

Sharing Concerns:

- If staff have a **low-level** concern about a member of staff (including a supply teacher or volunteer) they should be reported to the Headteacher. (If the concerns are about the DSL or the Headteacher these should be reported to the Chief Executive Officer or, if there is a conflict of interest, directly to the LADO)
- If staff find themselves in a situation that could be misinterpreted, or they have behaved in a way that falls below professional standards they should self-refer.

Recording Concerns:

- The DSL, deputy or the Headteacher should record all low-level concerns. Records should include:
 - Details of the concern
 - How the concern arose
 - The context in which the concern arose and
 - Action taken
- Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action taken

Please refer to the Trust's Low Level Concerns Policy and the Trust's Managing allegations Against Staff Policy for more information.

9. Pupils with special educational needs and disabilities

The links below details the specific policy guidance around SEND, First aid and medical conditions from Sheffield Children Safeguarding Partnership [Special Education Needs & Disability \(SEND\), Sept 21](#), [First aid & medical conditions, Sept 21](#)

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges, including:

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

We offer extra support for pupils with SEN and disabilities.

10. Pupils with a Social Worker

- Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:
 - Responding to unauthorised absence or missing education where there are known safeguarding risks
 - The provision of pastoral and/or academic support
- The school will provide as much information as possible as part of any referral process to help social care assessments consider contexts outside of the home and enable a contextual approach to harm.
- Child protection records should include:
 - **A clear and comprehensive summary of a concern**
 - **Details of how the concern was followed up and resolved**
 - **A note of any action taken, decisions reached and outcomes**

The designated school key worker will ensure that child protection and Child in need files are up to date and are stored on CPOMs or other similar safeguarding systems.

11. Children looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep children looked-after and previously children looked-after safe. We will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- We have appointed a designated teacher, who is responsible for promoting the educational achievement of children looked-after and previously children looked-after in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. The designated teacher for looked after and previously children looked-after

12. Confidentiality and Information Sharing

All staff are bound by the staff code of conduct and where appropriate teacher standards. The Sheffield Children Safeguarding Partnership has provided specific policy guidance around sharing information and confidentiality and on what and how to share information at key pupil transition points.

Process & Principles for sharing information:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

13. Notifying parents

- Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL or deputies will normally do this in the event of a suspicion or disclosure.
- Other staff will only talk to parents about any such concerns following consultation with the DSL or deputies.
- If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

14. Mobile phones and smart technology

- Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Further information can be found in the school's online policy.

15. Safeguarding in the curriculum

15.1 The Core Curriculum

The Core Curriculum of each school should address the following through its PSHE/SMSC/wider curriculum offer:

- Bullying/Cyberbullying/Peer to peer abuse
- On-line safety
- Diversity issues
- Forced marriage, Honour Based Violence, FGM
- Domestic violence, drug and alcohol abuse
- Extremism, radicalisation
- Sexual exploitation – grooming, sexting
- Sexual harassment / sexual violence
- Promoting safe and respectful relationships (primary and secondary)
- Health education
- Child Criminal Exploitation and gang violence

In relation to the above schools also need to be aware of and be able to respond in a timely manner to any emerging safeguarding issues that happen in the local context.

15.2 Enrichment activities

- Where the Trust or school provides services or activities under supervision or management of Trust/school staff then the Trust's and school's Safeguarding and Child protection policies apply.
- **Where services or activities are provided separately by another body** this is not necessarily the case. The school must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate.
- The school should ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

15.3 Use/hire of school/college premises for non-school/college activities

- Where schools hire out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.
- It is the responsibility of the individual school to obtain and check this information.

15.4 Work Experience

- Each individual school should ensure that the appropriate risk assessments and health and safety checks are in place to ensure the student's safety and wellbeing.

15.5 Alternative provision (AP)

- The school must ensure that the appropriate safeguarding measures are in place at the AP.
- The school needs to share relevant information on the referral form to ensure students can be adequately supported and safeguarded, and maintain regular contact with AP providers.
- Attendance data will be collected and recorded for all students attending AP provision.

15.6 Elective Home Education (EHE)

- Schools will work closely with the LA to ensure that any requests for EHE are followed up with a request from school for a meeting.
- All contact, subsequent meeting(s), meeting notes and outcomes will be carefully documented.

16. Complaints about safeguarding

16.1 Complaints

- Any external complaints about safeguarding in the school should follow the Trust complaints procedure.
- Any internal complaints about safeguarding in the school should be raised in the first instance with the headteacher.

16.2 Whistleblowing

- Whistleblowing is the term used when an employee or worker passes on information concerning alleged wrongdoing such as unlawful conduct, financial malpractice, causing a danger to staff, the public or environment, contravening the Trust or School policies or the Trust Code of Conduct or deliberate concealment of any of these alleged activities. The wrongdoing disclosed must be in the 'public interest' and personal grievances or complaints would not normally be covered by whistleblowing law.
- If you are concerned about any organisation's practice when safeguarding children or vulnerable adults, raise your concern internally with your headteacher
- If you feel unable to do this (e.g., your concern relates to them), raise your concern with one of the specified people in the Trust whistleblowing policy

17. Record-keeping

- We will hold records in line with Trust record retention schedule.
- Our school uses CPOMs (online safeguarding storage system) to keep all safeguarding files secure.
- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing (including CPOMS where appropriate). If you are in any doubt about whether to record something, discuss it with the DSL.
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded securely, and separately from the main student file. This will be completed in line with KCSIE guidance. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

18. Training and safer recruitment

18.1 All staff

- All staff members and volunteers will undertake safeguarding and child protection training at induction.
- Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

18.2 The DSL and deputy DSL(s)

- The DSL and [deputy/deputies] will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

18.3 Governors

- All Governors will receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

18.4 Safer Recruitment – interview panels & practices

The school will follow the Trust Recruitment Policy.

- At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.
- The school will ensure all necessary recruitment checks are carried out in accordance with KCSIE.

19. Monitoring arrangements

This policy will be reviewed **annually** by the Senior Director of Inclusion for the Trust. At every review, it will be approved by the Trust Board and Local Governing Body.

20. Equality Impact Assessment

The Trust will carry out an Equality Impact Assessment in order to ensure that policies, procedures and practices cater for individuals who share protected characteristics in relation to the Equality Act 2010. The purpose of these assessments is to ensure that policies, procedures and practices within the organisation are fair to all. If unfairness is highlighted, the assessment will also seek to show how this can be changed and, where it can't be changed, how it can be improved.

The Trust will monitor the impact of the policy to assess whether there is evidence of a detrimental impact on anyone with a protected characteristic as a result of the application of this policy. The assessment will include consideration of adaptations or changes which can be made to address any issues identified.