

<b>Title</b>	Safeguarding and Child Protection
<b>Associated Policies</b>	<ul style="list-style-type: none"> <li>• Anti-Bullying (TPO/STU/01)</li> <li>• Behaviour and Discipline (TPO/STU/03)</li> <li>• Complaints (TPO/QA/02)</li> <li>• Disciplinary Procedure (TPO/STA/22)</li> <li>• Safer Recruitment, SCR and Staff Files (TPO/STA/03)</li> <li>• Professional and Safe Conduct (TPO/STA/10)</li> <li>• Special Educational Needs and Inclusion (TPO/STU/05)</li> <li>• Recruitment and Induction (TPO/STA/27)</li> <li>• Student Care and Welfare (TPO/STU/06)</li> <li>• Training and Development (TPO/STA/18)</li> <li>• Whistle Blowing (TPO/STA/19)</li> <li>• Online Safety (TPO/STU/12)</li> <li>• Data Protection (TPO/STA/25)</li> <li>• Single Equality (TPO/EO/01)</li> <li>• Home Academy Agreement</li> <li>• Dealing with Allegations Against Staff (TPO/STA/21)</li> <li>• Relationship Education, Relationships and Sex Education and Health Education Policy (TPO/STU/10)</li> </ul>

REVIEWED: SEPTEMBER 2022

NEXT REVIEW: SEPTEMBER 2023  
*Or sooner if required*

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## Document Control

<b>Date of last review:</b>	September 2022	<b>Author:</b>	Trust Safeguarding Lead
<b>Date of next review:</b>	September 2023	<b>Version:</b>	8
<b>Approved by:</b>	pending	<b>Status:</b>	Ratified

## Summary of Changes

- References to Keeping Children Safe in Education (2022) throughout the document
- Changed references to peer-on-peer abuse to child-on-child abuse throughout
- Updated DSL contacts for 2022-2023 (**section 1**)
- Added Trust Safeguarding Officer and Secondary Phase Safeguarding Advisor details and amended Whistleblowing Officer details (**section 1**)
- Added details for the Professional Online Safety Helpline and Harmful Sexual Behaviour Service (**section 1**)
- Clarified reporting routes for conduct concerns relating to Principals/Central Team staff (**section 1**)
- Updated contact number for Northamptonshire MASH (**section 1.3**)
- Included reference to building trusted relationships, listening to children, maintaining professional curiosity and RSHE (**paragraph 2.3**)
- Inserted that the policy should be read in conjunction with KCSIE (**paragraph 2.4**)
- Clarified that the policy applies to all on-site and off-site activities undertaken by students whilst they are the responsibility of the academy (**paragraph 3.4**)
- Inserted a statement about anti-discriminatory practice (**paragraph 3.5**)
- Updated legislation, guidance and linked policies (**Section 4**)
- Updated the definition of abuse, as per KCSIE (**paragraph 5.4**)
- Inserted new responsibilities for the Chief Executive Officer (**paragraph 6.3**)
- Condensed safeguarding governor responsibilities (**paragraph 6.10**)
- Inserted new responsibilities for Executive Principals (**paragraph 6.11**)
- Inserted the requirement for Principals and DSLs to contribute to safeguarding quality assurance activities (**paragraphs 6.12 – 6.13**)
- Inserted that DSLs and DDSLs are not expected to monitor communications or CPOMS outside of working hours (**paragraph 6.15**)
- Inserted that DSLs will be given additional time, funding, training and resources to carry out their role (**paragraph 6.16**)
- Inserted new responsibilities for the DSL (**paragraph 6.16**)
- Condensed responsibilities for all staff (**paragraph 6.17**)
- Inserted a requirement for academies to assess staff understanding of safeguarding (**paragraph 6.18**)
- Inserted new responsibilities for the Trust Safeguarding Officer and Trust Safeguarding Advisors (**paragraphs 6.20-6.21**)
- Clarified that students should not be asked to write down their disclosures and that staff should understand initial disclosures may not represent an isolated incident (**paragraph 7.7**)
- Added 'recording' requirements, clarifying that concerns should be logged before the end of the day (**paragraph 7.8**)
- Removed reference to requirements for the DSL to escalate information to the Principal to avoid duplication (**paragraph 7.8**)
- Clarified that concerns about imminent danger or significant harm should be passed to a DSL/DDSL immediately, and in person (**paragraph 7.8**)
- Clarified the requirements for the DSL to maintain a list of vulnerable students (**paragraph 7.11**)
- Clarified the requirement for DSLs to follow escalation processes (**paragraph 7.12**)
- Inserted a new paragraph on trigger points and escalation (**paragraph 7.13**)

- Moved content on specific safeguarding issues from the appendices to the main body of the policy and significantly updated content (**Section 8**)
- Embedded the Children Not Collected From School Policy (**paragraph 8.11**)
- Incorporated the response to child-on-child abuse, with significant updates (**paragraph 8.5 and Section 9**)
- Removed Figure 1 (**Formerly Section 9**)
- Created a section on 'Children at Greater Risk of Harm', incorporating and updating existing content, including moving content from the appendices into the main policy, and adding a new section for children who are LGBT (**Section 10**)
- Removed duplicated reference to the Equality Statement
- Included reference to staff understanding extra-familial harms (**paragraph 11.2**)
- Replaced the requirement for Prevent training to be completed every two years, with every three years unless otherwise required by a school's Prevent Risk Assessment (**paragraph 11.3.2**)
- Clarified training requirements for Governors and Trustees (**paragraph 11.5.1**)
- Clarified 'case manager' requirements for Executive Principals and the CEO (**paragraph 11.5.4**)
- Clarified training requirements for staff (**paragraph 11.8.1**)
- Updated content relating to Relationships Education, Relationship and Sex Education and Health Education (**Section 12**)
- Inserted a minimum requirement for half-termly visits to students at Alternative Provision (**paragraph 13.2**)
- Added clarity relating to safer working practice (**section 14**)
- Added clarity relating to safeguarding concerns and allegations against staff, including reporting routes (**Section 16**)
- Condensed information relating to recruitment and selection of staff, to avoid duplication with other policies (**section 17**)
- Condensed information relating to the single central record, , to avoid duplication with other policies (**section 18**)
- Clarified that safeguarding information can be shared where it has not been possible to obtain consent, as detailed in KCSIE (**paragraph 19.4**)
- Clarified the requirements around file transfer (**paragraph 20.7-20.8**)
- Inserted additional information regarding the use of force (**paragraph 21.4**)
- Clarified that searches should only be carried out by authorised staff and that all incidents of physical intervention and searches must be recorded on CPOMS (**paragraph 21.5**)
- Clarified requirements relating to the hiring of academy premises (**paragraph 22.2**)
- Inserted information on strip searches and the role of the Appropriate Adult (**Appendix A**)
- Removed descriptive content from the former Appendix B and incorporated within the main policy
- Removed Appendix B – Signs and symptoms of possible significant harm and included within separate addendum for staff us (**Appendix B**)
- Deleted Appendix D – Public Health Emergency Covid-19 Arrangements

**Introduction****1. Key Contacts for Safeguarding at Brooke Weston Trust**

- 1.1** Academy-level contacts, including the Principal, Designated Safeguarding Leads (DSL) and Deputy Safeguarding Leads (DDSL), are on pages 6-7.
- 1.2** The Safeguarding Strategic Lead for Brooke Weston Trust (BWT) and the Safeguarding Advisors, who operate across all Trust Academies in a support and advisory capacity, can be contacted using the details below:

- Trust Safeguarding Officer:  
James Down [jdown@brookewestontrust.org](mailto:jdown@brookewestontrust.org) 07841 199080
- Primary phase Safeguarding Advisor:  
Sarah Fleming [Sarah.Fleming@beanfieldprimary.org](mailto:Sarah.Fleming@beanfieldprimary.org) 01536 262000
- Secondary Phase Safeguarding Advisor:  
Kate Jeyes [kjeyes@brookeweston.org](mailto:kjeyes@brookeweston.org) 01536 396366

**1.3 The Multi-Agency Safeguarding Hub (MASH)**

The MASH team can advise on whether a family needs early help or whether they meet the threshold for statutory child protection. They can be contacted by members of staff or parents/carers.

- North Northamptonshire: 0300 126 7000
- Cambridgeshire: 0345 045 5203

**1.4 Local Authority Designated Officer (DO)**

North Northamptonshire

Email: [LADOferral@nctrust.co.uk](mailto:LADOferral@nctrust.co.uk) Telephone 01604 362993

<http://www.northamptonshirescb.org.uk/Academys/referrals-eha/designated-officer/>

Cambridgeshire

Email: [LADO@cambridgeshire.gov.uk](mailto:LADO@cambridgeshire.gov.uk) Telephone 01223 727967

<https://www.safeguardingcambspeterborough.org.uk/children-board/professionals/lado/>

**1.5 Out of hours service**

Should you need to contact children's Social Care urgently during the evening, at night or at the weekend, phone the out of hours team on 01604 626938 (Northamptonshire) or 01733 234724 (Cambridgeshire). An operator will answer the phone and take details of the problem and your contact details. They will then pass this information over to the duty social worker.

**1.6 Whistleblowing Officer**

James Down ([jdown@brookewestontrust.org](mailto:jdown@brookewestontrust.org)) 07841 199080 or CEO ([acampbell@brookewestontrust.org](mailto:acampbell@brookewestontrust.org)) if concern relates to the Whistleblowing Officer.

**1.7 Other contacts**

- Professional Online Safety Helpline 0344 381 4772 or [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- Harmful Sexual Behaviour Service 0344 225 0623 or [hsbsupport@swgfl.org.uk](mailto:hsbsupport@swgfl.org.uk)
- NSPCC 0808 800 5000 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk) – 24-hour service.
- Childline 0800 1111 <https://www.childline.org.uk/>
- Police 111 or 999 in emergency

## BWT Primaries

			<b>Beanfield Primary</b>						<b>Peckover Primary</b>						<b>Compass Primary</b>			<b>Gretton Primary</b>			<b>Oakley Vale Primary</b>																				
			Principal Sam Eathorne						Principal Kate Kendal						Principal Jo Fallowell			Principal Julia Dickinson			Principal Emma Goodwin																				
			DSL Sarah Fleming			DDSL Louise Tombleson			DSL Esther Fletcher			DDSL Charlotte Salter			DSL Callum Reilly			DSL Julia Dickinson			DSL Fran Dunn																				
DDSL Gemma Cushings			DDSL Sam Eathorne			DDSL Declan Byrne			DDSL Nicky Howell			DDSL Teresa Stiles			DDSL Sam McGovern			DDSL Nicole Andrews			DDSL Jo Fallowell			DepSL Sarah Block			DDSL Hannah Moore			DepSL Paula Crawford			DDSL Claire Johnson			DDSL Becky Annetts			DDSL Ruth Eaton		
			Safeguarding Governor Stephen Prati						Safeguarding Governor David Oliver			DDSL Helen Foad			Safeguarding Governor Simon Bateson						Safeguarding Governor Tim Eaton			DepSL Kerry Young			DDSL Sarah Sanders			Safeguarding Governor Stephen Prati											

<p><b>Beanfield Primary</b> – 01536 262000                  Sarah Fleming, Designated Safeguarding Lead, <a href="mailto:Sarah.Fleming@beanfieldprimary.org">Sarah.Fleming@beanfieldprimary.org</a>                  Sam Eathorne, Deputy Safeguarding Lead, <a href="mailto:Sam.Eathorne@beandfieldprimary.org">Sam.Eathorne@beandfieldprimary.org</a>                  Gemma Cushings, Deputy Safeguarding Lead, <a href="mailto:Gemma.Cushings@beandfieldprimary.org">Gemma.Cushings@beandfieldprimary.org</a>                  Declan Byrne, Deputy Safeguarding Lead, <a href="mailto:Declan.Bryne@beandfieldprimary.org">Declan.Bryne@beandfieldprimary.org</a></p>	<p><b>Oakley Vale Primary</b> – 01536 461199                  Fran Dunn, Designated Safeguarding Lead, <a href="mailto:FDunn@oakleyvaleprimary.org">FDunn@oakleyvaleprimary.org</a>                  Emma Goodwin, Deputy Designated Safeguarding Lead, <a href="mailto:EGoodwin@oakleyvaleprimary.org">EGoodwin@oakleyvaleprimary.org</a>                  Becky Annetts, Deputy Safeguarding Lead, <a href="mailto:BAnetts@oakleyvaleprimary.org">BAnetts@oakleyvaleprimary.org</a>                  Claire Johnson, Deputy Safeguarding Lead, <a href="mailto:CJohnson@oakleyvaleprimary.org">CJohnson@oakleyvaleprimary.org</a>                  Ruth Eaton, Deputy Safeguarding Lead, <a href="mailto:REaton@oakleyvaleprimary.org">REaton@oakleyvaleprimary.org</a></p>
<p><b>Compass Primary</b> – 01536 532707                  Callum Reilly, Designated Safeguarding Lead, <a href="mailto:CReilly@compassprimary.org">CReilly@compassprimary.org</a>                  Nicole Andrews, Deputy Safeguarding Lead, <a href="mailto:NAndrews@compassprimary.org">NAndrews@compassprimary.org</a>                  Jo Fallowell, Deputy Safeguarding Lead, <a href="mailto:JFallowell@compassprimary.org">JFallowell@compassprimary.org</a></p>	<p><b>Peckover Primary</b> – 01945 584741                  Esther Fletcher, Designated Safeguarding Lead, <a href="mailto:efletcher@peckoverprimary.org">efletcher@peckoverprimary.org</a>                  Kate Kendal, Deputy Safeguarding Lead, <a href="mailto:kkendal@peckoverprimary.org">kkendal@peckoverprimary.org</a>                  Louise Tombleson, Deputy Safeguarding Lead, <a href="mailto:ltombleson@peckoverprimary.org">ltombleson@peckoverprimary.org</a>                  Sam McGovern, Deputy Safeguarding Lead, <a href="mailto:smcgovern@peckoverprimary.org">smcgovern@peckoverprimary.org</a>                  Nicky Howell, Deputy Safeguarding Lead, <a href="mailto:NHowell@peckoverprimary.org">NHowell@peckoverprimary.org</a>                  Teresa Stiles, Deputy Safeguarding Lead, <a href="mailto:TStiles@peckoverprimary.org">TStiles@peckoverprimary.org</a>                  Charlotte Salter, Deputy Safeguarding Lead, <a href="mailto:CSalter@peckoverprimary.org">CSalter@peckoverprimary.org</a>                  Helen Foad, Deputy Safeguarding Lead, <a href="mailto:HFoad@peckoverprimary.org">HFoad@peckoverprimary.org</a></p>
<p><b>Gretton Primary</b> – 01536 770366                  Julia Dickinson, Designated Safeguarding Lead, <a href="mailto:Julia.Dickinson@grettonprimary.org">Julia.Dickinson@grettonprimary.org</a>                  Hannah Moore, Deputy Safeguarding Lead, <a href="mailto:Hannah.Moore@grettonprimary.org">Hannah.Moore@grettonprimary.org</a>                  Sarah Block, Deputy Safeguarding Lead, <a href="mailto:Sarah.Block@grettonprimary.org">Sarah.Block@grettonprimary.org</a>                  Paula Crawford, Deputy Safeguarding Lead, <a href="mailto:Paula.Crawford@grettonprimary.org">Paula.Crawford@grettonprimary.org</a>                  Kerry Young, Deputy Safeguarding Lead, <a href="mailto:Kerry.Young@grettonprimary.org">Kerry.Young@grettonprimary.org</a></p>	

Contact information for the Executive Principals in the event of reporting a concern about the conduct of a Principal: Andy Burns (secondary), [aburns@brookewestontrust.org](mailto:aburns@brookewestontrust.org) (Secondary) or Leyton Smith (primary), [lsmith@brookewestontrust.org](mailto:lsmith@brookewestontrust.org). Contact information for the Chief Executive in the event of reporting a member of the Central Team: [acampbell@brookewestontrust.org](mailto:acampbell@brookewestontrust.org) / 01536 397000.

## BWT Secondaries

<b>Brooke Weston Academy</b>			<b>Corby Business Academy</b>			<b>Kettering Science Academy</b>			<b>Corby Technical School</b>			<b>Thomas Clarkson Academy</b>		
Principal Shaun Strydom			Principal Simon Underwood			Principal Tony Segalini			Principal Angela Reynolds			Principal Richard Scott		
DSL Kate Jeyes			DSL Amy Harris			DSL Alex Merry			DSL Elizabeth James			DSL Alex Salmon		
DDSL Angeline Annable	DDSL Rebecca Waterson	DDSL Caren Brown	DDSL Claire Robinson	DDSL Donna Lapsley	DDSL Laurence Woodcock	DDSL Liz Weller	DDSL Kelly Smithyman	DDSL Beth Clark	DDSL Laurence Scott	DDSL Emma Toye	DDSL Ben Armstrong	DDSL Hayley Davies	DDSL Claire Ziebart	DDSL Claire Thomas
DDSL Vicky Hilling	DDSL Charlie Simcoe	DDSL Patrick Hallam	DDSL Sarah Mangan	DDSL Charlene Underwood	DDSL Francia Dickinson		Safeguarding Governor Paul Jackson	DDSL Diane Elleman		Safeguarding Governor Gary Campbell		DDSL Kate Allgood	Safeguarding Governor Jan Hutchinson	DDSL Emma Flisher
		DDSL Lisa Hawkins		Safeguarding Governor Claudia Slabon	DDSL Richard White									

<p><b>Brooke Weston Academy</b> – 01536 396366                  Kate Jeyes, Designated Safeguarding Lead, <a href="mailto:KJeyes@brookeweston.org">KJeyes@brookeweston.org</a>                  Nina Smith, Deputy Safeguarding Lead, <a href="mailto:NSmith@brookeweston.org">NSmith@brookeweston.org</a>                  Wanda Gerard, Deputy Safeguarding Lead, <a href="mailto:WGerard@brookeweston.org">WGerard@brookeweston.org</a>                  Angeline Annable, Deputy Safeguarding Lead, <a href="mailto:AAnnable@brookeweston.org">AAnnable@brookeweston.org</a>                  Vicky Hilling, Deputy Safeguarding Lead, <a href="mailto:VHilling@brookeweston.org">VHilling@brookeweston.org</a>                  Stuart Littlejohn, Deputy Safeguarding Lead, <a href="mailto:SLittlejohn@brookeweston.org">SLittlejohn@brookeweston.org</a>                  Sarah Mangan, Deputy Safeguarding Lead, <a href="mailto:SMangan@brookeweston.org">SMangan@brookeweston.org</a>                  Charlie Simcoe, Deputy Designated Safeguarding Lead, <a href="mailto:csimcoe@brookeweston.org">csimcoe@brookeweston.org</a>                  R Waterson, Deputy Designated Safeguarding Lead, <a href="mailto:rwatson@brookeweston.org">rwatson@brookeweston.org</a></p>	<p><b>Corby Technical Academy</b> – 01536 213100                  Elizabeth James, Designated Safeguarding Lead, <a href="mailto:EJames@corbytechnicalschoool.org">EJames@corbytechnicalschoool.org</a>                  Laurence Scott, Deputy Safeguarding Lead, <a href="mailto:LScott@corbytechnicalschoool.org">LScott@corbytechnicalschoool.org</a>                  Emma Toye, Deputy Safeguarding Lead, <a href="mailto:EToye@corbytechnicalschoool.org">EToye@corbytechnicalschoool.org</a>                  Ben Armstrong, Deputy Safeguarding Lead, <a href="mailto:BArmstrong@corbytechnicalschoool.org">BArmstrong@corbytechnicalschoool.org</a></p>
<p><b>Kettering Science Academy</b> – 01536 532700                  Alex Merry, Designated Safeguarding Lead, <a href="mailto:AMerry@ketteringscienceacademy.org">AMerry@ketteringscienceacademy.org</a>                  Kelly Smithyman, Deputy Safeguarding Lead, <a href="mailto:KSmithyman@ketteringscienceacademy.org">KSmithyman@ketteringscienceacademy.org</a>                  Liz Weller, Deputy Safeguarding Lead, <a href="mailto:LWeller@ketteringscienceacademy.org">LWeller@ketteringscienceacademy.org</a>                  Beth Clark, Deputy Safeguarding Lead, <a href="mailto:BClark@ketteringscienceacademy.org">BClark@ketteringscienceacademy.org</a>                  Diane Elleman, Deputy Safeguarding Lead, <a href="mailto:DElleman@ketteringscienceacademy.org">DElleman@ketteringscienceacademy.org</a></p>	<p><b>Thomas Clarkson Academy</b> – 01945 585237                  Alex Salmon, Designated Safeguarding Lead, <a href="mailto:ASalmon@thomasclarksonacademy.org">ASalmon@thomasclarksonacademy.org</a>                  Hayley Davies, Deputy Safeguarding Lead, <a href="mailto:HDavies@thomasclarksonacademy.org">HDavies@thomasclarksonacademy.org</a>                  Claire Ziebart, Deputy Safeguarding Lead, <a href="mailto:CZiebart@thomasclarksonacademy.org">CZiebart@thomasclarksonacademy.org</a>                  Emma Flisher, Deputy Safeguarding Lead, <a href="mailto:EFlisher@thomasclarksonacademy.org">EFlisher@thomasclarksonacademy.org</a>                  Claire Thomas, Deputy Safeguarding Lead, <a href="mailto:CThomas@thomasclarksonacademy.org">CThomas@thomasclarksonacademy.org</a>                  Kate Allgood, Deputy Safeguarding Lead, <a href="mailto:KAllgood@thomasclarksonacademy.org">KAllgood@thomasclarksonacademy.org</a></p>
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**2. Aim of policy**

- 2.1 The Brooke Weston Trust commits to providing an environment that safeguards and promotes the welfare, safety and health of our students. The BWT recognises the importance of the contribution it can make to protecting and supporting students across its academies.
- 2.2 The aim of the policy is to:
- Protect children from any maltreatment or harm and prevent any impairment of their health and/or development
  - To ensure each academy offers a safe and supportive environment for all children under its care and creates a culture of vigilance throughout the organisation
  - Ensure all staff, governors and visitors are aware of and clearly understand their statutory safeguarding responsibilities
  - Outline how all staff, governors and visitors will meet their safeguarding duty and protect children from harm
  - Enable all children, no matter what their background or circumstance, to have optimum life chances beyond the Academy.
- 2.3 BWT will therefore ensure the following arrangements are in place to safeguard and promote the welfare of children.
- **Prevention:** BWT will create an ethos and culture where all students feel secure and able to build trusted relationships with staff. Children will be encouraged to talk and feel confident that they will be listened to. Staff and volunteers will be trained regularly to understand their responsibilities to recognise and report safeguarding or child protection concerns. This includes maintaining professional curiosity and understanding that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or may not recognise their experiences as harmful. Students are taught about safeguarding, including online, through various teaching and learning opportunities as part of a broad and balanced curriculum.
  - **Protection:** BWT will ensure that each member of staff, governor and other visitor involved in regulated activity with students has undergone a thorough safer recruitment process and is sufficiently trained and supported to respond appropriately and sensitively to safeguarding and child protection concerns.
  - **Support:** Schools will provide structured systems of support for all students and appoint appropriately qualified and experienced staff (DSLs and DDSLs) to provide advice, training and support around safeguarding concerns.
  - **Working with parents and external agencies:** The BWT will work closely with parents to ensure appropriate communications and actions are undertaken. The BWT will develop and maintain links with relevant external agencies in all matters relating to safeguarding and child protection. All academies assess the risks and issues in the wider community as part of the safeguarding curriculum.
  - **Commitment:** BWT expects everyone to share this commitment, creating a culture of vigilance.
- 2.4 BWT commits to acting in accordance with Keeping Children Safe in Education. This policy does not aim to replicate the guidance in full. Therefore, the policy should be read in conjunction with at least Part One and Annex B of Keeping Children Safe in Education (2022).

**3. Principles this policy is based on**

- 3.1 BWT recognises that:
- the safety and welfare of a student is always of paramount consideration and will work together with parents, carers and other agencies to safeguard and promote the welfare of the child;



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

### 3.2 BWT expects:

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

**3.3** BWT commits to work in partnership with the Northamptonshire Safeguarding Children Partnership (NSCP) and the Cambridgeshire and Peterborough Safeguarding Children Partnership and will follow their guidance and implement their systems and protocols for referring families for early help and reporting child protection concerns. The Partnerships will ensure that each academy is aware of issues within the community that are relevant to them. DSLs will ensure that all staff and governors are aware of those issues and systems for reporting and will provide local safeguarding updates, as signposted by the partnership(s). A summary of the safeguarding issues facing each academy, and the academy's response, can be found in [Appendix D](#).

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

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

## 4. Legislation and statutory guidance

This policy sets out how the Brooke Weston Trust carries out its statutory responsibility to safeguard and promote the welfare of students. This includes:

### 4.1 Statutory Guidance

- Keeping Children Safe in Education (KCSIE) (2022)
- Working Together to Safeguard Children (2018)
- Multi-agency statutory guidance on female genital mutilation (2020)
- Early Years Foundation Stage
- Teachers' Standards July (2021)

**4.2 Legislation**

- The Children Act 1989 and The Children Act (2004)
- Section 5B(11) of the Female Genital Mutilation Act (2003), as inserted by section 74 of the Serious Crime Act (2015)
- The Rehabilitation of Offenders Act (1974)
- Safeguarding Vulnerable Groups Act (2006)
- Counter-Terrorism and Security Act (2015) (and the Prevent Duty guidance)
- The Education Act (2002)
- Education (Independent Academy Standards) (England) Regulations (2014)
- The Academy Staffing (England) Regulations (2009)
- Part 1 of the schedule to the Non-Maintained Special Academies (England) Regulations (2015)
- The Equality Act (2010)
- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)
- The Childcare (Act 2006)
- Public Sector Equality Duty (2012)

**4.3** The BWT also has regard to the following guidance and reviews relating to safeguarding, including:

- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2022)
- Information Sharing: Guidance for Safeguarding Services (July 2018)
- Teaching Online Safety in schools (2019)
- DfE Guidance on Relationships education, relationships and sex education (RSE) and health education (2020)
- Sharing nudes and semi nudes: Advice for education settings working with children and young people (2020)
- Child Protection in England: National review into the murders of Arthur Labinjo-Hughes and Star Hobson (2022)
- Local Child Safeguarding Practice Review: Child Q (2022)
- Searching, Screening and Confiscation (2022)
- Protecting Children from Radicalisation: The Prevent Duty (2015)

**4.4 Guidance**

From the North Northamptonshire and Cambridgeshire Safeguarding Children Partnership (NSCP):  
<http://www.northamptonshirescb.org.uk>  
<https://www.safeguardingcambspeterborough.org.uk/children-board/>

**5. Definitions**

**5.1 Safeguarding and promoting the welfare of children** is defined in KCSIE (September 2022) as:

- protecting children from maltreatment;
- preventing impairment of children’s mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

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

- Supporting students’ health, safety and well-being, including their mental health;
- Meeting the needs of children with special educational needs and/or disabilities;
- The use of reasonable force;
- Meeting the needs of children with medical conditions;

- Providing first aid;
- Educational visits;
- Intimate care and emotional wellbeing;
- Online safety and associated issues;
- Appropriate arrangements to ensure Academy security, taking into account the local context;
- Keeping children safe from risks, harm and exploitation; and
- Child protection.

**5.3 Child protection** is part of safeguarding and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**5.4 Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment on others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**5.5 Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development<sup>1</sup>.

**5.6 Child on child abuse** refers to the abuse of a child or children perpetrated by another child or children. 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;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).<sup>2</sup>

**5.7 Children** includes everyone under the age of 18.

**5.8** Within this policy:

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

<sup>1</sup> See Appendix B for more information about abuse and neglect.

<sup>2</sup> Keeping Children Safe in Education (2022)

- 5.9 **Keeping Children Safe in Education** (September 2022) may be abbreviated to ‘KCSIE’.
- 5.10 Child abuse is covered by the term “**significant harm**” and is defined in the Adoption and Children Act 2002 in the following way:
- “harm” means ill-treatment or the impairment of health or development
  - “development” means physical, intellectual, emotional, social or behavioural development
  - “health” means physical or mental health
  - “ill-treatment” includes sexual abuse and forms of ill-treatment which are not physical

## 6. Who is responsible for carrying out this policy?

- 6.1 Safeguarding and promoting the welfare of children is **everyone’s responsibility** – it is the duty of all staff, governors, volunteers and visitors at BWT to accept and understand their responsibilities for safeguarding and to follow the agreed principles and procedures outlined in this policy.
- 6.2 **The Board of Directors will:**
- determine and keep under review the Trust’s safeguarding policy;
  - ensure that an effective organisation is created for the management of safeguarding and child protection concerns;
  - ensure that the Trust promotes the correct attitude towards safeguarding and child protection with staff, volunteers and visitors; and
  - monitor and evaluate the effectiveness of the academies’ safeguarding practices and procedures.
- 6.3 **The Chief Executive Officer (CEO)**
- The CEO, as delegated by the Board of Directors, is accountable for the safeguarding of children across the BWT and responsible for the implementation of this policy across the Trust’s academies. The CEO reports to the Board of Directors on all safeguarding matters.
- The CEO will:
- ensure that the Trust has suitable safeguarding-related policies implemented in all Trust academies, including the behaviour policy for students and a professional and safe conduct policy for staff.
  - Regularly review the effectiveness of the safeguarding provision across the Trust, including assessment of progress against the Trust’s safeguarding strategy and review of safeguarding risks.
  - ensure that this policy is reviewed annually and ratified by the Board.
- 6.4 **The Safeguarding Review Group**
- The Safeguarding Review Group is a subcommittee of the Board. The core purpose of the Safeguarding Review Group is to initiate improvements in the Trust’s working practices, systems and procedures to support effective safeguarding practice in each Academy’s statutory and regulatory roles to protect young persons from potential or actual harm.
- 6.5 It is the responsibility of the Safeguarding Review Group to ensure implementation of the Trust’s safeguarding policies, monitoring the effectiveness and impact of the policies and recommend and implement improvements where needed.
- 6.6 The Chair of the Safeguarding Review Group provides a (brief and by exception) written report to each Board meeting to report on risk in this area.
- 6.7 **Local Governing Bodies**
- It is the overarching responsibility of the local governing bodies to ensure that the Brooke Weston Trust’s Safeguarding and Child Protection policy and procedures are in place at academy level and are operating effectively.
- 6.8 The local governing body must appoint a nominated Safeguarding Governor to monitor the academies’ implementation of the policy in more depth and report back to the Local Governing Body. The

Safeguarding Governor will visit the school regularly, and access regular safeguarding updates through attendance at termly Trust Safeguarding Governor Forums.

- 6.9** All governors must attend all relevant induction and annual training and development provided by the Trust. It is the responsibility of all governors to ensure they have read and understood the KCSIE document (Part 1, Part 2 and Annex B) and this policy and have signed a declaration confirming this has been undertaken on appointment and each time the policy and KCSIE are updated.
- 6.10** Part 2 of KCSIE (September 2022) sets out the responsibilities of governing bodies and all governors will adhere to this guidance at all times. This includes:
- working to facilitate a whole Academy approach to safeguarding, including child on child abuse, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
  - ensuring that policies, procedures, and training at the Academy are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
  - ensuring that the Academy has systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible.

Further details can be found [here](#).

- 6.11 The Executive Principal/Chief Education Officer (secondary)** have strategic responsibility for the standards in Trust academies, including quality of safeguarding provision. It is the responsibility of the Executive Principal and Chief Education Officer (secondary) to:
- ensure that a suitable organisation within each academy is in place to satisfy the duties and arrangement as outlines in this policy, including ensuring that appropriate staffing with the required time, funding, resources and support is in place;
  - ensure, in co-ordination with the Principal, that all relevant Senior Managers are capable and competent in their given roles and provided with suitable and sufficient information and instruction;
  - maintain strategic oversight of the effectiveness of safeguarding within their academies;
  - ensure each academy has a nominated Safeguarding Governor
  - respond to low level concerns or allegations of abuse against the Principal in line with the Low-Level Concerns and Dealing with Allegations Against Staff Policies. The Executive Principal and Chief Education Officer (secondary) will act as the ‘case manager’ in the event that an allegation of abuse is made against the Principal.
- 6.12 Principals/Associate Principals** are accountable for the effective safeguarding of children in their Academy’s and will:
- ensure that this policy and associated procedures, including the use of CPOMS, are adhered to by all staff and take action as necessary if not;
  - ensure that staff (including temporary staff) and volunteers are informed of systems that support safeguarding, including this policy, as part of their induction.
  - ensure that all staff are made aware of the named governor for safeguarding and the DSL;
  - promote an environment and culture of safety where students feel safe and listened to and this includes ensuring that the curriculum includes safeguarding and how to keep safe;
  - ensure that the role of ‘DSL’ is explicit in the role-holder’s job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent;
  - decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the DSL;
  - organise appropriate cover for the role of DSL for any out of hours/out of term activities;
  - appoint a ‘Designated Teacher for Looked After and Previously Looked After Children’ to promote the educational achievement of children looked after and previously looked after;
  - ensure the whistle blowing policy and procedures have been disseminated to all staff and that

- any allegations against staff are responded to appropriately;
- ensure safe recruitment practice is followed when recruiting to posts.
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with children;
- respond to allegations of abuse/concerns against all other members of staff and act as the 'case manager' in the event of an allegation of abuse/concerns made against another member of staff or volunteer, implementing the appropriate disciplinary and appeals procedures as required
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the Academy works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;
- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- ensure that children's social care (from the host local authority or placing authority) have access to the Academy to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2022);
- ensure the relevant staffing ratios are met, where applicable (Early years providers and primary academies); and
- contribute to safeguarding quality assurance activities; and
- make sure each child in the Early Years Foundation Stage is assigned a key person (Early years providers).
- **Each academy Principal will retain accountability for all safeguarding-related matters within their academy.**

### 6.13 Designated Safeguarding Leads (DSL)

The DSL is a member of the Senior Leadership Team. The DSL takes lead responsibility for child protection and wider safeguarding and will be given additional time, funding, training, resources and support to carry out their role effectively. Each Academy's DSL is listed on p. 6-7. The full responsibilities of the DSL are set out in Annex C, KCSIE (2022).

Note: The Trust Safeguarding Officer is not the DSL for any individual academies within the Trust.

**6.14** When the DSL is absent, the Deputy DSL will cover. If they are not available, a member of SLT will cover. Any deputies will be trained to the same standard as the designated safeguarding lead. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

**6.15** BWT recognises the pressures inherent within the role of DSLs and DDSLs, and the demands placed upon them. To preserve staff wellbeing, BWT does not expect DSLs or DDSLs to monitor emails, phonelines or CPOMS (child protection recording software) outside of working hours, except during periods of planned academy trips or activities. All members of the academy community (staff, parents, and students) will be made aware of this expectation. Where staff are not contracted to work outside of termtime, an emergency rota will be in place covering normal working hours during holiday periods, but excluding bank holidays and weekends. To promote the safety of children during these times, academies will regularly share contact details for statutory and non-statutory support services, including police and children social care, with all members of the academy community. This will include via the academy website.

**6.16** The DSL will:

- act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- provide oversight, support and challenge to DDSLs;
- act as a point of contact with the safeguarding partners and engaging fully with requests for information (e.g., Section 175 audit);
- perform the role of Online Safety Lead;
- be aware of and up to date with latest national and local guidance and requirements, ensuring this is shared with all key personnel.
- advise on the response to safeguarding concerns, ensuring that all safeguarding concerns raised by staff are properly assessed, categorised, actioned and resolved, and ensuring that decisions and rationales are clearly recorded;
- liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children (2018);
- be aware of the requirement for children to have an Appropriate Adult and follow the procedures outlined in [Appendix A](#);
- identify if children may benefit from early help;
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- support their academy with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- refer cases to the police where a crime may have been committed;
- be available during academy hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;
- undertake training to equip them with the skills to carry out the role and update this every two years;
- maintain a forensic understanding of safeguarding data, including data relating to child on child abuse
- ensure all staff that work directly with children have read and understood Part 1 and Annex B of KCSIE (September 2022);
- ensure all staff that do not work directly with children have read either Part 1 or Annex A (as appropriate) of KCSIE (2022);
- update their knowledge and skills regularly and keep up with any developments relevant to their role;
- provide staff in their academy with the knowledge, skills and support required to safeguard children;
- ensure that all staff in their academy receive initial training and appropriate regular update training via whole staff training or bulletins on safeguarding, including how to recognise the signs and symptoms of abuse. This includes provision of training on how to report a safeguarding concern through the academy's CPOMS safeguarding recording system.
- ensure that all staff have an understanding of child abuse, neglect and exploitation and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs and disabilities or those who identify as LGBT
- take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- take responsibility for the transfer of safeguarding files when a child leaves their academy;
- monitor academy mobility, and in particular take responsibility for those children removed from the academy is in adherence with LA and Trust guidance, ensuring that all reasonable

- steps are taken to ensure that the child is safe;
- attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- ensure that parents and carers are informed of the safeguarding procedures by a statement in the academy prospectus, access to the policy and procedures on the academy website and reminders via newsletters;
- work closely with other relevant education professionals (e.g., SENCO, Virtual Academy Head) to ensure children with additional vulnerabilities are safeguarded;
- help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the academy leadership team;
- promote a 'culture of safeguarding', in which every member of the academy community acts in the best interests of the child;
- meet regularly with the safeguarding link governor and/or Chair of Governors to review safeguarding at their academy;
- meet regularly with relevant curriculum leads to share information about emerging trends and ensure that the safeguarding curriculum is meeting the needs of students;
- meet regularly with the academy Business Manager/HR to ensure that safe recruitment practices are in place and effective, including checking that the academy's Single Central Record is maintained in line with statutory guidance;
- contribute to safeguarding quality assurance activities;
- Liaise with the headteacher regarding safeguarding cases and issues.

**6.17 All staff**

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children. All staff:

- have a responsibility to provide a safe environment, where children can learn;
- will be made aware of and should be clear on the Trust and individual academy's policy and procedures with regards to safeguarding and 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;
- will attend mandatory training provided by the Trust/academy so that they know and understand: how to identify indicators of abuse, neglect, harm and abuse and the behaviours associated with these risks; what to do if a child discloses information which is a safeguarding concern (including FGM); what safeguarding systems are in place within the academy, including the use of CPOMS for recording concerns, decisions and actions, and;
- must be aware of who the safeguarding team are
- are responsible for ensuring that they have read and understood key policies such as the Acceptable Use Policy, Professional and Safe Conduct Policy, Safeguarding and Child Protection Policy
- should be prepared to make referrals to the MASH if they are concerned that a child is suffering, or likely to suffer, significant harm and understand the role that they may be expected to play in social care assessments;
- will be encouraged to contribute to the development of safeguarding policy and practice.

**6.18** All staff that work directly with children will be provided with a copy of, and must read, Part 1 and Annex B of KCSIE annually and will receive annually updated training on their safeguarding roles and responsibilities. Staff that do not work directly with children will be provided with a copy of Part 1 of KCSIE (2022) and must read this document. In either case, all members of staff must sign a declaration confirming they have done this. Academies will make use a variety of methods to assess staff understanding.



- 6.19** Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of Trust or individual academy safeguarding policy or practice, they speak to the DSL or Trust Safeguarding Officer immediately, so that additional training can be arranged.
- 6.20 The Trust Safeguarding Officer** will set the strategic safeguarding direction for the Trust, working in an advisory capacity to provide support and guidance to Principals and DSLs on all safeguarding related matters. The main areas of responsibility include:
- Strategic oversight of developing safeguarding and child protection ensuring statutory compliance and development of this area
  - Developing, implementing, and evaluating the impact of an annual safeguarding action plan
  - Representing the Trust within strategic multi-agency partnerships
  - Implementing of the Safeguarding Learning and Improvement Framework to promote effective quality assurance and practice improvement
  - Implementing the Safeguarding Learning and Development Strategy to support academies to identify and respond to statutory and emerging training needs
  - Providing advice, guidance and coaching support to DSLs on complex safeguarding cases
  - Chairing Trust DSL Network Meetings
- 6.22 The Primary and Secondary Phase Safeguarding Advisors** will work in an advisory capacity across the Trust, providing support and guidance to the Trust Safeguarding Officer and DSLs across their respective phase. The main areas of responsibility include:
- Chairing respective Primary and Secondary DSL Network Meetings, incorporating group case supervision
  - Supporting the implementation of exemplary safeguarding practice across each phase, as informed by BWT policies
  - Contributing to the development and implementation of the Primary and Secondary Safeguarding Action Plan, as informed by the Trust Safeguarding Action Plan, and lead on oversight and evaluation
  - Contributing to the development and delivery of Trust-wide safeguarding learning and development opportunities, as informed by the Trust Learning and Development Strategy
  - Contributing to the development and evaluation of the Trust Safeguarding and Child Protection Policy
  - Membership of the Strategic Safeguarding Group
  - Membership of the Safeguarding Review Group
  - Providing a virtual source of advice and support to DSLs, if required

## Student Safeguarding

### 7. Recognising and responding to abuse: how to take action

- 7.1** If a member of staff, parent or member of the public is concerned about a student's welfare, they should report it to the DSL as soon as possible. If the DSL is not available, it should be reported to the deputy safeguarding lead/s immediately. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.
- 7.2** Although any member of staff can make a referral to children's social care, where possible there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.
- 7.3** All staff will be alert to indicators of abuse (including child on child) and will report any of the following to the Designated Safeguarding Lead immediately;
- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;

- any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child's presentation;
- any indicators that a child may be experiencing child on child abuse;
- any concerns relating to people who may pose a risk of harm to a child; and/or
- any disclosures of abuse that children have made.

**7.4** More information about our approach to child on child abuse (including sexual violence and sexual harassment) can be found in sections 11.3 and 12.

**7.5** For more information regarding specific safeguarding issues, please see Part One and Annex B of KCSIE (2022) and [Section 11](#) of this policy.

#### **7.6 Responding to a Disclosure**

When responding to a disclosure from a child, staff will:

- listen to what is being said without displaying shock, disbelief or other emotion;
- accept what is being said;
- allow the child to talk freely;
- reassure the child, but not make promises which might not be possible to keep;
- never promise a child that they will not tell anyone – it may not be in their best interest;
- reassure them that what has happened is not their fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify – do not investigate;
- not criticise the alleged perpetrator;
- explain what has to be done next and who has to be told;
- not ask students to write a written record of their disclosure;
- reassure the victim they are being taken seriously and they will be supported and kept safe. A victim should never be given the impression they are creating a problem by reporting abuse (including sexual violence and sexual harassment), nor should a victim ever be made to feel ashamed for making a report;

#### **7.7 Reporting and Recording a Concern**

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

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

The DSL/DDSL will then:

- keep a confidential record of all comments, actions and observations. These records will be filed, kept securely and access will only be given to the DSL, the DDSL and the Executive Principal/Principal/Associate Principal.
- seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL or the DDSL will make contact with the parent in the event of a concern, suspicion or disclosure. However, if the DSL or the DDSL believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care/Multi Agency Safeguarding Hub (MASH).

- If the DSL or the DDSL believes that “a child is experiencing or may have already experienced abuse or neglect” or “is at risk of suffering significant harm” either now or in the future, then the academy will comply with the procedures of the Local Safeguarding Partnership.

#### 7.8 Concerns About Significant Harm or Imminent Danger

Any member of staff that suspects or has evidence of child abuse must notify the DSL or a DDSL **immediately and in person**. A referral must be made if a child may be suffering or at risk of suffering harm. Whilst the DSL or a DDSL should make the referral, anyone can make a referral to children’s social care. If anyone other than the DSL makes a referral to children’s social care or to the police, they should inform the DSL as soon as possible.

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

Staff should log concerns on CPOMS, at the earliest opportunity, providing sufficient information and context for the DSL/DDSL to assess the information. The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children’s social care, using the thresholds guidance published by the local safeguarding partnership. If it is decided to make a referral to children’s social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 19 for more details.

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

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

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

#### 7.10 Early help and Vulnerable Children

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

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

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan (EHCP));
- has a mental health need;
- is a young carer;

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the Academy day.

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

#### **7.11 Referrals**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the Academy will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

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

All Child Protection records, including referrals, will be maintained in a confidential file at the academy. The protocols as outlined in the Data Protection Policy must be followed.

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

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

The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Contact details for the MASH can be found in Section 1 of this policy.

#### **7.12 Trigger Points and Escalation**

In the event of serious incidents, Principals, Executive Principals and the Trust Safeguarding Officer should be notified by the DSL/Principal in line with the BWT CPOMS Toolkit.

## 8. Response to Specific Safeguarding Issues

The below provides an overview of how academies will respond to specific safeguarding issues. The list is not exhaustive and is designed to complement the contents of Keeping Children Safe in Education (2022). Staff should follow the procedures outlined above when responding to, recording and reporting the specific safeguarding issues detailed below. The response of DSLs and DDSs will always be guided by Keeping Children Safe in Education (2022) and multi-agency policies and procedures implemented by the safeguarding partnership.

### 8.1 Female Genital Mutilation

FGM is a collective term for all procedures involving the partial or total removal of external female genitalia for cultural or other nontherapeutic reasons.

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), the Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015) places a statutory duty upon 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.

Further information can be found [here](#), and within [Appendix B](#).

### 8.2 Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. A marriage must be entered into with the free and full consent of both parties, there must be a choice.

When responding to concerns regarding Forced Marriage, advice can be sought from the Forced Marriage Unit:

- Telephone - (0) 20 7008 0151
- Email - [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

Further information can be found [here](#).

### 8.3 Breast Ironing/Flattening

Breast ironing or flattening is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of known cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware.

Breast ironing is a form of physical abuse.

Staff or volunteers worried about the risk of breast ironing should report their concerns to the DSL immediately, who will make a referral to the Multi-Agency Safeguarding Hub. If staff or volunteers are concerned that a student is in immediate danger, they should contact the police immediately by calling 999.

The DSL will contact the Foreign and Commonwealth Office if the student has been taken abroad:

- Telephone – 020 7008 1500
- Further information can be found [here](#).

#### 8.4 Radicalisation and Extremism

The Brooke Weston Trust has a statutory duty under Section 26 of The Counter-Terrorism and Security Act 2015 and the statutory Prevent Guidance 2015 to have due regard to the need to prevent people from being drawn into terrorism.

The [Prevent Duty Guidance](#) requires academies to:

- a) **Assess the local risk of extremism** – Academies should assess the risk of children being drawn into terrorism. This assessment should be carried out alongside key partners of the Academy, based on the local environment and informed by the Counter Terrorism Local Profile. The risk assessment will inform the academy's strategic approach to the prevention of radicalisation and extremism, including training and online filtering and monitoring.
- b) **Work in partnership** – Academy's will ensure that they follow the policies and procedures of the local safeguarding partnership. Staff will work closely with the police and local Prevent co-ordinator.
- c) **Train Staff** – all staff will complete Prevent training at least every three years. This will ensure that staff have the confidence to identify children at risk and to challenge extremist ideas and should know where and how to refer children and for further help. DSLs will also complete training on the Channel process.
- d) **Implement IT Policies** – Academies will take steps to protect children online by ensuring appropriate levels of filtering and monitoring. More information can be found in the Online Safety policy.

BWT is committed to ensuring that all students benefit from a broad and balanced curriculum that prepares them for life in modern Britain. Fundamental British Values underpin all aspects of the education and curriculum offered to students.

More information on the Channel process can be found [here](#).

#### 8.5 Child on Child Abuse

All staff should be aware that children can abuse other children (see Section 5.6 for definition and types), either inside or outside of the academy and respond to any concerns with the same rigour as they would for those involving adults. BWT does not accept and will not tolerate child on child abuse of any kind.

Measures to minimise these risks are included in the Anti-bullying and Behaviour and Discipline policies, which should be applied in conjunction with the Safeguarding and Child Protection policy.

#### 8.6 Online Safety

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, the Online Safety Policy and associated Acceptable Use Policies are written in line with KCSIE (September 2022) 'Teaching Online Safety in Schools' 2019, statutory RSHE guidance 2019 and other relevant statutory and non-statutory guidance.

Technology, and the risk and harms associated with it, evolves and change rapidly. The academy will carry out an annual review of their approach to online safety, overseen by the DSL who performs the role of Online Safety Lead.

The Online Safety Lead will work with relevant curriculum leads to ensure that online safety is embedded within the curriculum. This will include ensuring that the curriculum is inclusive and accessible and reflects the heightened vulnerability of some students online (e.g., students with SEND).

Each academy makes use of filtering and monitoring to block inappropriate content and monitor student internet on school-owned devices, or any other student device accessing the school network. Monitoring includes an element of external, human moderation. Concerns are logged directly on to CPOMS and brought to the attention of the DSL. Monitoring does not apply when students access the internet via their own devices and via 3G, 4G and 5G. The academy will teach students about the acceptable use of technology, recognising online risk and ways to stay safe online, including when using personal devices. The academy will encourage students to report any incidents relating to harmful content, conduct or contact. Where such incidents are caused by the behaviour of another student, the Behaviour and Discipline Policy will be applied. Policies in relation to the use of mobile phones by students will be in place within each academy.

Where a safeguarding concern for a student relates to online safety, usual safeguarding procedures in relation to responding, recording and reporting will apply. This may lead to the provision of school-based interventions, early help, or referral to the police or MASH. The response will be overseen by the DSL. More detailed guidance can be found in the Online Safety Policy.

### **8.7 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.

The academy recognises that both boys and girls can be victims of criminal exploitation, and that as children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised. The academy will adopt a child-centred approach when responding to any concerns relating to child criminal exploitation and will always consider child criminal exploitation when responding to reports of suspected offending by students.

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 non-contact 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.

Each academy will raise awareness of CSE and CCE when appropriate through the safeguarding curriculum (see Section 12), guided by the age and stage of children and safeguarding priorities within the local area.

Academies recognise that some children may not realise they are being exploited and may believe that they are in a genuine, romantic relationship. The academy will be particularly mindful of this when responding to reports involving 16- and 17-year-olds who, whilst above the legal age of consent, may have been coerced into engaging in sexual activity.

Academies will follow procedures outlined by their local Safeguarding Partnership when responding to concerns about child exploitation. This will include making use of available screening tools to identify and respond to potential risks.

Further information in relation to on [Child Sexual Exploitation](#), [Serious Youth Violence](#) and [County Lines](#) can be accessed by clicking on the hyperlinks.

### **8.8 Domestic Abuse**

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.

Domestic abuse can also include child/adolescent to parent violence. More information on this hidden form of domestic abuse can be found [here](#).

Students will be encouraged to report incidents of domestic abuse, by raising awareness of healthy relationships through the curriculum and regularly reminding students of sources of help and support available. Staff will also be mindful that the behavioural response of children who witness domestic abuse may include acting out, withdrawal or anxiousness to please. They may exhibit signs of anxiety, or may use violence, aggression, or self-injury to express themselves.

Any concerns relating to domestic abuse will be logged on CPOMS immediately.

Academies will engage with Operation Encompass, a scheme run the police, through which school are notified of incidents of domestic abuse. Upon receipt of this information, DSLs will ensure that students are closely monitored, and support is put in place, where appropriate.

### **8.9 Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Whilst only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff are well placed to observe children and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. All staff should be aware of how these experiences can impact on their mental health, behaviour, and education.

All academies will seek to embed positive mental health and mental health awareness by creating a culture where students can self-identify, signpost peers and seek support themselves. Key staff will complete mental health training and academies will promote positive mental health and wellbeing through the curriculum.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken in line with the procedures outlined above.

Further information on promoting the mental health and wellbeing of children can be found [here](#).

### **8.10 Private Fostering**

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, in their own home, with the intention that it should last for 28 days or



more. A 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. Academy staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their legal duty to inform the local authority. The Academy itself has a duty to inform the local authority of the private fostering arrangements.

On admission to an academy, steps will be taken to verify the relationship of the adults to the child who is being registered.

#### 8.11 Children Not Collected From School

On rare occasions, instances occur where children of school age are left uncollected for considerable lengths of time. BWT will respond sensitively, yet consistently, to ensure the safety and welfare of all children.

On admission to a school, parents/carers should provide accurate information about who holds parental responsibility for their children i.e. names, addresses and telephone numbers, names and telephone numbers of 2/3 emergency contact persons and any information if anyone other than the parent/carer is to collect a child from school. As specified in the Home School Agreement, parents/carers must provide updated contact details when these are changed.

Schools will ensure that parents are provided with information about the times of the school day and the expectation regarding the delivery and collection of children, where appropriate.

If a child is not collected from school 15 minutes after the end of the school day, staff will telephone (if possible) the parents/carers.

If there is no response, staff will attempt to contact those persons identified as emergency contacts and notify the Principal/DSL.

If, after 30 minutes, it has not been possible to contact parents/carers or emergency contacts, consideration should be given to notifying the police. The Principal/DSL may also contact the Multi-Agency Safeguarding Hub (MASH) team or equivalent, if appropriate.

Detailed, timed records of the action taken, and calls made must be maintained.

### 9. Child on Child Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour

9.1 As outlined in Sections 5 and 8, the academy recognises that children can abuse children. This may involve harmful sexual behaviour, including sexual harassment and sexual violence.

#### 9.2 Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum (see [Hackett Harmful Sexual Behaviour Continuum](#)), ranging from normal and developmentally expected to inappropriate and problematic (problematic sexual behaviour) or abusive and violent (harmful sexual behaviour). Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. It can occur online and/or face-to-face and can also occur simultaneously between the two.

Sexual violence and sexual harassment are examples of harmful sexual behaviour and can occur between two or more children of any age and sex and may occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

All academies adopt a zero-tolerance approach to sexual violence and sexual harassment. Staff will not dismiss incidents as “banter”, “just having a laugh” or “part of growing up”, as this could lead to a culture of unacceptable behaviour, and unsafe environment, or a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it. Staff are expected to challenge and report all forms of sexual violence and sexual harassment.

All staff must adopt an attitude of “it could happen here” and understand that even if there are no reports in their academy, this does not mean it is not happening and may indicate that incidents are not being reported.

All staff will receive training on harmful sexual behaviour, including sexual violence and sexual harassment.

### 9.3 Sexual Violence

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003, 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. (Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes 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).

### 9.4 Sexual Harassment

Sexual harassment may include:

- Sexual comments
- Sexual “jokes” or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes
- Displaying pictures, photos or drawings of a sexual nature
- Upskirting (see 5.6)
- Online sexual harassment, which may include:
  - Consensual and non-consensual sharing of nude and semi-nude images and/or videos (see BWT CPOMS Toolkit and Online Safety Policy for more information)
  - Sharing unwanted explicit content
  - Sexualised online bullying
  - Unwanted sexual comments and messages, including, on social media
  - Sexual exploitation; coercion and threats, and
  - Coercing others in to sharing images of themselves of performing acts they’re not comfortable with online

### 9.5 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.

- A child under the age of 13 can never consent to any sexual activity
- The legal age of consent is 16
- Sexual intercourse without consent is rape.

Children will be taught about consent through the safeguarding curriculum.

All staff are expected to understand the meaning of consent.

### 9.6 Preventing Harmful Sexual Behaviour

The academy will adopt a whole school approach to safeguarding, creating a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment. All students will receive a strong preventative education programme that will help to create an environment in which all children are supportive and respectful of their peers when reports of sexual violence and sexual harassment are made.

The DSL will work with local partner agencies, including police and social care, to ensure that they have a proactive understanding of local protocols for harmful sexual behaviour.

The DSL and DDSLs will map out, and know how to access, local specialist support that is available to children who are victims or those displaying harmful sexual behaviour.

The DSL will regularly analyse reports of harmful sexual behaviour, to identify and respond to emerging trends at the student or cohort level. This may involve working with relevant curriculum leads to respond proactively to emerging themes.

The DSL will make use of a range of quantitative and qualitative student voice information to understand the lived realities of students within each academy.

### 9.7 Initial Response to Reports of Harmful Sexual Behaviour

All incidents of harmful sexual behaviour should be reported and recorded in line with any safeguarding concern for a child, for which all staff are trained.

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

- aim to have two members of staff present, including a DSL or DDSL
- reassure victims that they will be taken seriously, irrespective of whether the abuse has occurred inside or outside of school.
- Not promise confidentiality
- Recognise that the initial disclosure may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- Consider that certain children may face additional barriers to reporting
- Listen carefully to the child, reflect back, using the child's language, be non-judgemental, be clear about boundaries and how the report will be progressed and, not ask leading questions
- Record the incident on CPOMS and notify the DSL or a DDSL. Records should include the facts as the child presents them and free from opinion.

- Have due regard for the [Screening Searching and Confiscation Guidance](#), and the [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people, when responding to incidents involving online sexual abuse](#). Staff will not view or forward illegal images of children, under any circumstances

All DSLs and DDSLs will understand local referral processes to police and social care.

## 9.8 DSL or DDSL Response to Harmful Sexual Behaviour

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

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

In addition to the above, DSLs will consider and record the incident on CPOMS, using the BWT Harmful Sexual Behaviour Reporting Template. This DSL will maintain an understanding of intra familial harms and any necessary support for siblings following incidents.

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

Where a DSL/DDSL makes a referral to police or social care against the victim's wishes, this will be handled carefully and sensitively, with adequate time given to explaining the decision and rationale to the victim.

In cases which are found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who has made the allegation is in need of help and/or may have been abused by someone else. Where this is the case, consideration will be given to referring to children's social care.

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

## 9.9 Managing Police Involvement in Case Of Harmful Sexual Behaviour

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

- Consult with police and agree what information can be disclosed to staff and others, including the parents of the child who is alleged to have displayed harmful sexual behaviour, and how to protect the victim and their anonymity.
- Work closely with the police to ensure that any actions taken by school do not jeopardise the police investigation, but will not wait for an outcome before taking steps to protect all children involved and in the wider academy community
- carefully consider the balance between managing risk and the rights of an unconvicted person, particularly when the police make use of bail conditions
- continue to offer support to the child who has allegedly displayed harmful sexual behaviour
- update the risk assessment in cases where the police find a child guilty of an offence, to ensure relevant protections are in place, and consider any suitable action in line with the Behaviour and Discipline Policy.
- Continue to support all children involved for as long as is necessary in cases where the police outcome is “no further action”.

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

#### 9.10 Ongoing Management and Support for Children

When safeguarding and supporting the victim, the DSL will:

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

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

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

#### 9.11 Monitoring Harmful Sexual Behaviour

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

### 10. Children at Greater Risk of Harm

- 10.1** Brooke Weston Trust recognises that whilst all children should be protected, some groups of children are potentially at greater risk of harm than others. All staff will be made aware of the potentially heightened vulnerability of the following student groups. Key staff will be made aware of potentially vulnerable students, on a need-to-know basis. DSLs will put in place mechanisms facilitate additional

monitoring of students identified as vulnerable. This may include implementing additional school-level interventions, working with partner agencies to provide early help, or referring to statutory or specialist services, if required.

### **10.2 Special Educational Needs and Disabilities**

The Trust fully recognises the importance of awareness around additional vulnerabilities of children with special educational needs (SEN) and disabilities, or certain medical or physical health conditions and the additional safeguarding challenges children can face both on and offline. All staff will be made aware of the additional barriers that can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- students being more prone to peer group isolation than other students;
- the potential for students 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; and/or
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviors in or the consequences of doing so.

The DSL will liaise closely with the SENCO following any reports of abuse relating to children with SEND. Further information can be found in the BWT SEND Policy.

### **10.3 Children who are LGBT**

Children who are, or are perceived to be, LGBT can be targeted by other children. Risks can be compounded when children who are LGBT lack a trusted adult with whom they can be open. Staff will be mindful of the additional barriers that may face children who are LGBT and will seek to build trusted relationships with students and provide a safe space for them to speak out or share their concerns. LGBT inclusion is embedded within Health Education, Relationship Education and Relationship and Sex Education.

### **10.4 Children with a social worker and those who previously needed a social worker**

Students may need a social worker due to safeguarding or welfare needs. This may be due to abuse and/or neglect and/or complex family circumstances. The Trust 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 positive mental health.

Academies will work with the local authority and external agencies to ensure there is effective support for this group of children.

Local authorities should share the fact that a child has a social worker, and the DSL will hold and use this information to ensure that decisions can be made in the best interest of the child's safety, welfare and educational outcomes. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support), and will be taken into account when making decisions which may increase the level of risk to a child (e.g., fixed term or permanent exclusions). In such circumstances, academies will work with partner agencies to identify and mitigate risks, wherever possible.

### **10.5 Looked after children and previously looked after children**

All staff must be aware of the issues regarding safeguarding for looked after and previously looked after children.

All academies will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, they 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 social workers and relevant virtual school heads;
- each Academy has a Designated Teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance; and
- the designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

## 10.6 Elective Home Education (EHE)

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

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

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

The academy will also look to engage the Local Authority and other relevant agencies at the earliest opportunity to ensure that parents and carers have considered what is in the best interests of their child. This is particularly important where a child has SEND and/or a social worker and/or is otherwise vulnerable.

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

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

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

## 10.7 Children Requiring Mental Health Support

All staff must be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

All academies have a nominated Mental Health Lead, who will implement a range of systems and processes to facilitate the identification of possible mental health problems.

Any concerns relating to mental health and wellbeing, including referrals and escalation to Child and Adolescent Mental Health Services, will be recorded on CPOMS. Academies will also make use of a range of internal and external interventions to support students experiencing mental health problems.

### 10.8 Children Missing from Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding issues. This may include abuse and neglect, which may include child sexual and child criminal exploitation – particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their Academy's unauthorised absence and children missing from education procedures.

All academies will:

- Monitor attendance carefully and address poor or irregular attendance without delay
- Always follow up with parents/carers when students are not at the academy
- Take reasonable steps to obtain at least two up to date contacts numbers for parents/carers. Parents should remember to update the academy as soon as possible if the numbers change. Ensure staff understand what to do when children do not attend regularly
- Follow local authority policies and procedures in relation to children who go missing from education, including notifying the local authority of when a child is missing from education or being removed from roll at standard and non-standard transition points
- Ensure that staff understand the signs and indicators of students who may be at risk of FGM, forced marriage or travelling to conflict zones.

Students who are expected to attend the academy but fail to take up the place will be referred to the Local Authority.

When a student leaves the academy, robust records are maintained including the name of the student's new academy and their expected start date, wherever possible.

## 11. Recognising abuse: Training

**11.1** The Trust is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. All safeguarding training will be underpinned and delivered in line with the BWT Safeguarding Learning and Development Strategy. We strive to ensure that staff fully understand their safeguarding responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect or harm.

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

### 11.3 All staff

**11.3.1** All staff members must undertake safeguarding and child protection training at induction (including online safety and whistle-blowing procedures) to ensure they understand the Academy's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.

**11.3.2** All staff will have training on the government's anti-radicalisation strategy Prevent, to enable



them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. This should be renewed every 3 years, or more frequently depending on the academy's Prevent Risk Assessment.

**11.3.3** 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.

**11.3.4** Teachers and support staff as relevant to their role will receive training to ensure that they can manage behaviour effectively to ensure a good and safe educational environment and they should have a clear understanding of the needs of all Students.

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

**11.3.6** Volunteers will receive appropriate training, as applicable.

#### **11.4 The DSL and Deputy DSLs**

**11.4.1** The DSL and Deputy DSLs will undertake Designated Safeguarding Lead training at least every 2 years.

**11.4.2** 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).

**11.4.3** They will also undertake Prevent awareness training and online safety training.

#### **11.5 Governors and Trustees**

**11.5.1** All governors and trustees receive safeguarding and child protection (including online safety) training at induction. Training is regularly updated. Training is focused on equipping them with the knowledge to provide strategic challenge to test and assure themselves that safeguarding policies and procedures in place in academies are effective and support the delivery of a robust whole school approach to safeguarding.

**11.5.2** In the event that a governor of a BWT Academy has been unable to attend the annual safeguarding training sessions by the specified date for completion, their position as a governor will be reviewed by the Chair of Governors in discussion with the Principal/Associate Principal.

**11.5.3** An annual record of training will be maintained.

**11.5.4** As the Executive Principals and CEO may be required to act as the 'case manager' in the event that an allegation of abuse is made against a Principal or a member of the Central Team, they should receive training in managing allegations for this purpose.

#### **11.6 Recruitment (interview panels)**

**11.6.1** At least one person conducting any interview for a post at the Academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2022), and will be in line with local safeguarding procedures.

#### **11.7 Supervision**

**11.7.1** All DSL's and Deputy DSL's who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

#### **11.8 Specific safeguarding issues**

11.8.1 Staff will also receive appropriate levels of training and/or information on a range of thematic safeguarding issues, as referenced below. Further information about all of these concerns is available in Annex B of Keeping Children Safe in Education (2022):

- Abuse – including domestic, faith and relationship-based abuse
- Bullying
- Child abduction
- Children and the court system
- Children missing from education, home or care
- Children with a family member in prison
- Child exploitation – including sexual and criminal, county lines, modern slavery and trafficking
- Child on child abuse
- Cybercrime
- Drugs
- Health and wellbeing – fabricated illness, medical conditions, mental health
- Homelessness
- Online safety, including up skirting and the consensual and non-consensual sharing of nude and semi-nude imagery peer on peer abuse
- Private fostering
- Radicalisation and Prevent
- so-called ‘honour-based’ abuse, including forced marriage and FGM
- Violence – including serious violence, gangs, women and girls and sexual violence and harassment

11.8.2 Training will be provided through a range of delivery methods, to meet the needs of different groups of staff, and will be prioritised according to locally identified needs.

**12. Relationship Education, Relationship and Sex Education and Health Education**

12.1 Through the curriculum, staff will ensure that children receive a preventative education that teaches them how to keep themselves and others safe, including online, and prepares them for live in modern Britain. This includes creating a culture of zero tolerance for sexism, misogyny/misandry, homophobic, biphobia and sexual violence and harassment.

12.2 Through regularly timetabled lessons, students receive an inclusive, age and stage appropriate Health Education, in addition to Relationships Education for primary pupils and Relationships and Sex Education for secondary pupils. Key messages are reinforced throughout the curriculum and staff will receive training to support them in the delivery of the curriculum. Schools will use a variety of methods to meet the needs of vulnerable children, including children who are victims of abuse, and children with special educational needs or disabilities. The curriculum will explore issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and quality
- Body confidence and self-esteem
- How to recognise an abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable

More information can be found in the Relationship Education, Relationships and Sex Education and Health Education Policy.

**13. Alternative Provision**

- 13.1** All academies are responsible for the safeguarding of their students when they are placed in an alternative provision.
- Academies must obtain a written statement from the provider that they have completed all the vetting and barring checks that are necessary on their staff.
  - An annual quality assurance check should take place, along with random spot and planned visits.
  - It is essential that all students on the academy roll have their attendance checked daily and their progress and attainment at least once a half term.
  - Regular contact with parents must be maintained and at least half-termly visits must be completed by the academy to seek ongoing assurance with regards to the student's safety.

**Staff Safeguarding Expectations****14. Safer working practice**

- 14.1** All staff work to create and embed a culture of openness, trust and transparency, in which the Trusts values and expected behaviour (as set out in the Professional and Safe Conduct Policy) are constantly lived, monitored and reinforced by all staff.
- 14.2** All staff must act with professionalism at all times. To reduce the risk of unsafe or harmful practice, safer working practice training should be included in annual training days and staff should be familiar with the Professional and Safe Conduct Policy, Acceptable Use Policy and Safer Recruitment Consortium document Guidance for safer working practice for those working with children and young people in education settings (February 2022).
- 14.3** The Board, Governors and senior leaders will ensure that this policy is adhered to by:
- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others through effective training;
  - empowering staff to share any low-level safeguarding concerns;
  - addressing unprofessional behaviour and supporting the individual to correct it at an early stage; and
  - providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and
  - helping to identify any weakness in the academy's or Trust's safeguarding system.
- 14.4** Staff must adhere to the staff Professional and Safe Conduct Policy at all times. In the event of any concerns or allegations, the school will deal with them promptly, in line with local guidance and KCSIE (September 2022).
- 14.5** Staff use of mobile phones
- Staff will limit such use to times when students are not present. Staff members' personal phones will remain in their bags, cupboards or out of sight during contact time with students. Staff will not take pictures or recordings of pupils on their personal phones or cameras.
  - The General Data Protection Regulation and Data Protection Act 2018 will be adhered to when taking and storing photos and recordings for use in the school.
  - Individual schools will have their own mobile phone guidance to be followed whilst on their sites, and staff should familiarise themselves with this.

**15. Abuse of trust**

- 15.1** Inappropriate behaviour by staff towards students is unacceptable. Under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a student under 18 may be a criminal

offence, even if that student is over the age of consent. Other examples of inappropriate behaviour can be found in the Professional and Safe Conduct Policy. Such offences will be handled in line with the Dealing with Allegations of Abuse Against Staff.

## 16. Safeguarding concerns about and allegations against members of staff

**16.1** The Trust recognises the possibility that adults working in the Academy may harm children, including governors, volunteers, supply teachers and agency staff.

### **16.2** Allegations that may meet the harms threshold

The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the Academy or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

This includes behaviour or incidents that have occurred in the Academy and outside of the Academy.

Staff who are concerned about the conduct of a colleague towards a student may worry that they have misunderstood the situation and may wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The Trust's Whistleblowing Policy and Dealing with Allegations of Abuse Against Staff Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

**16.3** If a concern or allegation of abuse arises against any person working or volunteering on the school site (other than the Principal), this must be reported to the Principal immediately and not discussed directly with the person involved. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. Alternatively, staff are able to report the concern through the Trust Whistleblowing Procedure or directly to the Designated Officer (details on p.5). Further detail is provided in the Dealing with Allegations of Abuse Against Staff Policy.

The Principal should consider if the concern or allegation meets the threshold for Designated Officer intervention. Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made, and the police will be contacted if necessary.

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

**16.4** Allegations against the Principal must be reported to the Executive Principal.

Allegations against the Executive Principal must be reported to the CEO.

Allegations against Central Team Colleagues must be reported to the CEO.

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

### **16.5** Safeguarding concerns that do not meet the harm threshold (low level concerns)

In the event that there is a safeguarding concern about a member of staff, guidance outlined in Part 4, Section 2 of KCSIE (September 2022) will be adhered to.

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

**16.6** It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. All Academies will act quickly, proportionately and appropriately in the event of a low-level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (September 2022).

#### **16.7 Reporting low level concerns**

Low-level concerns should be reported to the Principal in line with the Low-Level Concern Policy. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept by the Principal/Associate Principal and/or HR.

The Principal may:

- Speak directly to the person who raised the concern (unless it has been raised anonymously).
- Speak to the individual involved and/or witnesses.

The Principal will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues within the Academy are identified, the Academy will either:

- take action through our disciplinary procedures;
- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

The academy will retain information about low-level concerns until the member of staff is no longer employed by the Trust.

#### **16.8 Supply staff**

Although the academy does not directly employ supply teachers, any concerns or allegations against supply teachers are handled properly. No academy will cease to use a supply teacher for safeguarding reasons without finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome. The Principal will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation.

The academy will inform supply agencies of its process for managing allegations and will take account of the agency’s policies and their duty to refer to the DBS as personnel suppliers. Informing supply agencies of our process for managing allegations includes inviting the agency’s human resource manager (or equivalent) to meetings and regularly updating agencies on relevant school policies. Please also refer to the Managing Allegations Against Staff Policy.

**17. Recruitment and selection of staff**

- 17.1 The Trust recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff and volunteers working at the academy are suitable to do so, therefore, they do not pose any kind of risk to our students.
- 17.2 Safer recruitment should be reflected in every stage of the process and safeguarding judgements need to be made, in differing degrees, in relation to all those that a student in an academy may come into contact with, as they may be perceived to be safe and trustworthy adults.
- 17.3 The Trust will ensure that its recruitment and selection procedures include clear systems to vet all applicants before they are placed at an academy. Details can be found in the SCR, Safer Recruitment and Staff Files Policy.
- 17.4 The Principal will ensure that members of the Senior Management team have received training in Safer Recruitment and that all interview panels have a member of trained staff on them. Safer Recruitment training should be renewed at least every 3 years.
- 17.5 Where the Trust recruits temporary or supply staff through an agency, the Trust will ensure that assurance is sought from the agency that all relevant pre-employment checks have been conducted, as set out in the SCR, Safer Recruitment and Staff Files Policy. Supply staff will present a copy of their DBS certificate and ID on arrival at the school site.
- 17.6 Each academy will ensure that the following procedures are followed for contractors on site:
  - Contractor to provide assurance that appropriate levels of pre-employment checks have been conducted.
  - Employees of the contractor will present ID on arrival at the school site
  - Acceptance by Academy/site of documentation.
  - Site inserts copy of documentation into an "approved visitors" folder with register at reception. NB all documentation must be destroyed on completion of project.
  - Contractor "signed into/onto" site and given formal site induction by Site Manager and safeguarding lead who outlines Safeguarding Policy/practice at earliest opportunity.
  - Contractor issued with an "approved visitor" badge.
  - Contractor conducts work.
  - On departure signs out, returns badge and visit duration is recorded in approved visitor register.
  - On subsequent visits contractor shows photo ID and signs in at reception. Reception refers to approved visitor register and records and alerts contractor to any known issues/risks/events.
  - Site staff notified accordingly by reception staff.
  - Approved visitor granted access to site to undertake work task.

**18. Single Central Record**

- 18.1 Each academy will maintain a Single Central Record (SCR) of all Academy employees, agency staff, volunteers (including governors), contractors and any others involved in regulated activity (including Alternative Provision).
- 18.2 The SCR will be overseen and directly managed by the Principal, with the support of the DSL, who is responsible for safeguarding in the academy and the academy safeguarding leadership team. It is the

responsibility of the HR Administrator/equivalent within the academy to maintain the information on the single central record.

- 18.3 Audits will be conducted half-termly, by the Designated Safeguarding Lead and Principal alternately. The Trust HR Manager will complete annual audits of the SCR.
- 18.4 The details of an individual should be removed for the SCR once they no longer work for the Academy and/or Trust.
- 18.5 A SCR will be maintained centrally for all Central Team and Trust-wide members of staff and Directors/subcommittee members. This will be shared with all Brooke Weston Trust academies as and when it is updated.
- 18.6 For further information about DBS checks, please refer to the Trust’s Disclosure and Barring Service Checks Policy.

**Records**

**19. Confidentiality and information sharing**

- 19.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children’s welfare, including their educational outcomes. Academies have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between each Academy, Children’s Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. If staff are unsure whether information should be provided, advice should be sought from the Data Protection Officer.
- 19.2 All academies adhere to the Data Protection Act (2018) and the General Data Protection Regulation (2018).
- 19.3 Sharing information with parents:
  - Each academy will ensure the Safeguarding and Child Protection Policy is available publicly on each academy’s website and on the Brooke Weston Trust website.
  - Where appropriate, staff will discuss any concerns about a child with the child’s parents. The Designated Safeguarding Lead (DSL) will normally do this in the event of a concern, suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.
  - 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.
- 19.4 Consent:  
The Data Protection Act 2018 introduced ‘safeguarding’ as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child at risk, or where it is not possible to gain consent. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.
- 19.5 As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.
- 19.6 When considering whether, or not, to share safeguarding information (especially with other agencies), staff will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.

- 19.7** All staff in each Academy will be made aware of their duties in relation to Data Protection and safeguarding, particularly in respect of confidentiality. This includes the following:
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
  - Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
  - Timely information sharing is essential to effective safeguarding.
  - Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.

## **20. Record keeping and File Transfer**

- 20.1** All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.
- 20.2** When a child has made a disclosure, the member of staff/volunteer should;
- record as soon as possible after the conversation, using CPOMS
  - not destroy the original notes in case they are needed by a court (this includes notes taken by the member of staff);
  - record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
  - Use a CPOMS body map to indicate the position of any injuries if relevant; and
  - record verbatim statements and observations within records, rather than interpretations or assumptions
- 20.3** All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.
- 20.4** The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.
- 20.5** Records will include:
- a clear and comprehensive summary of the concern;
  - details of how the concern was followed up and resolved; and
  - a note of any action taken, decisions reached and the outcome.
- 20.6** Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with the records retention schedule.
- 20.7** If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. The transfer will take place as soon as possible, and within 5 days for an in-year transfer and within 5 days of the start of a new term. Confirmation of receipt will be obtained. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- 20.8** When receiving child protection files for new students, academies will ensure that key staff (such as the DSL and SENCO) are aware, as required.
- 20.9** The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 is in place to protect the personal information of individuals. It does not prohibit information about children being shared with specific authorities if it is for the purposes of safeguarding children and individuals at risk. Information that could be relevant to keeping a child safe should be shared so that informed decisions



can be made about a child's welfare. We have a duty of care for our students and safeguarding is of upmost importance to us. GDPR does not 'trump' safeguarding. Processing safeguarding data is necessary for compliance with our legal obligation to which Brooke Weston Trust is subject. Therefore, consent is not needed for the effective sharing of safeguarding information between an academy and relevant authorities.

- 20.10** Upon receipt of any request regarding direct access to academy documentation on a Child Protection file, the Principal and DSL will be informed and a decision taken on the appropriate way forward in accordance with the Data Protection Policy.
- 20.11** Any external individual or organisation contracted by the academies to work with academy students must report any child protection incidents or disclosures from students to the Principal or DSL at the earliest opportunity. Such bodies will, as part of their contractual arrangements with the academies, be required to work in accordance with the Trust's child protection and safeguarding policy.

### Additional Information

#### 21. Use of physical interventions

- 21.1** There is an absolute ban on the use by any member of staff of any form of corporal punishment. This includes any physical contact which is deliberately intended to punish a student, or which is primarily intended to cause pain, injury or humiliation.
- 21.2** It is important to allow children to do what they can for themselves, but depending on age and circumstances, it may be necessary for some physical contact to take place; (e.g., a child who is hurt, who needs instruction in the use of a particular instrument/piece of equipment, safety issues such as the need to prevent a child hurting themselves, running into the road etc.).
- 21.3** Section 93 of the Education and Inspections Act 2006 enables Academy staff to use 'reasonable force' to prevent a student from:
- committing any offence (or, for a student under the age of criminal responsibility, what would be an offence for an older student);
  - causing personal injury to, or damage to the property of, any person (including the student themselves); or
  - prejudicing the maintenance of good order and discipline at the Academy or among any students receiving education at the Academy, whether during the teaching session or otherwise.
- 21.4** Reasonable force means using no more force than is needed. When using reasonable force in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, staff will recognise and consider the additional vulnerability of these groups and seek to reduce the need to use reasonable force by planning positive and proactive behaviour support and working with parents and carers.
- 21.5** Authorised Academy staff may, under certain circumstances, use reasonable force to carry out a search. These include, but are not limited to, searches for knives and weapons, alcohol and illegal drugs, stolen items and items that could be used to commit an offence or cause injury to self or others, as identified in Paragraph 3 of the DfE Searching, Screening and Confiscation guidance. In the event of searches or physical restraint being needed, parents will be informed the same day and all searches and uses of physical intervention will be recorded on CPOMS. See [Appendix A](#) for more information on searching.

#### 22. Use of Academy premises for non-Academy activities

- 22.1** When Academy facilities are rented or hired out to organisations or individuals the Business Manager/Principal/Associate Principal must ensure that appropriate arrangements are in place to keep children safe.

- 22.2** When services are provided under the direct management of the Academy, the Academy's safeguarding and child protection procedures apply. If this is not the case Academy must seek assurances that the body concerned has appropriate procedures in place and inspect these as needed and ensure that arrangements are in place to liaise with the Academy on relevant matters. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.
- 22.3** Safeguarding arrangements must be included in any transfer of control agreement (such as letting or hire agreement). Failure to comply with this would lead to termination of the agreement.

### **23. Early years settings within academies**

- 23.1** As an early year's provider delivering the Early Years Foundation Stage (EYFS), all Brooke Weston Trust primary academies aim to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance  
<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>
- 23.2** All BWT Primary academies will ensure that all children in the nursery and reception classes, and/or two-year old provision, are able to learn, develop, be safe and healthy by providing;
- a safe secure learning environment;
  - a member of staff who holds a current, paediatric first aid certificate is available on the premises at all times, and accompanies children on Academy trips;
  - a designated key worker who liaises with parents and carers;
  - routine monitoring of health and safety practices, to promote children's safety and welfare;
  - Appropriate staffing, ratios and qualifications comply with statutory guidance and can meet the needs of all children;
  - an environment where children can be seen and heard at all times;
  - a member of staff responsible for leading on safeguarding within the early years; and
  - training and development for all staff so they are able to take appropriate action where there are safeguarding or child protection concern.

### **24. Complaints**

- 24.1** The Brooke Weston Trust's complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Complaints are managed by senior staff, the Principal/Associate Principal and governors and in exceptional circumstances the Chief Executive. Complaints from staff are dealt with under the Academy's complaints and disciplinary and grievance procedures (TPO/QA/02).

### **25. Policy Review**

- 25.1** This policy will be reviewed annually or as required by legislature changes.

## Appendix A – Strip Searches and Appropriate Adults

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

### *Strip Searches*

A strip search is a search involving the removal of more than outer clothing. Strip searches on school premises can only be carried out by police officers under the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with the Police and Criminal Evidence Act 1984 (PACE) Code C. While the decision to undertake the strip search itself and its conduct are police matters, staff retain a duty of care to the students involved and should advocate for student wellbeing at all times. **Staff are not permitted to conduct strip searches on students.**

Before calling police into school, staff should assess and balance the risk of a potential strip search on the student's mental and physical wellbeing and the risk of not recovering the suspected item. Staff should consider whether introducing the potential for a strip search through police involvement is absolutely necessary, and should always ensure that other appropriate, less invasive approaches have been exhausted. Once the police are on school premises, the decision on whether to conduct a strip search lies solely with them, and the role of the school is to advocate for the safety and wellbeing of the student(s) involved.

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

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

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

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

Students will be given appropriate support, irrespective of whether the suspected item is found. If an item is found, this may be a police matter, but should always be accompanied by a safeguarding process handled by the school which gives attention to the student's wellbeing and involves the DSL/DDSL. Safeguarding should also be at the centre of support following a strip search in which the item is not found, both in the sense of supporting the student

to deal with the experience of being searched, and regarding wider issues that may have informed the decision to conduct a strip search in the first place. In both cases, students should feel that they have an opportunity to express their views regarding the strip search and the events surrounding it. School staff should give particular consideration to any students who have been strip searched more than once and/or groups of pupils who are more likely to be subjected to strip searching with unusual frequency, and consider preventative approaches.

### *Appropriate Adults*

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code. PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS. If having been informed of the vulnerabilities, the DSL or DDSL does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

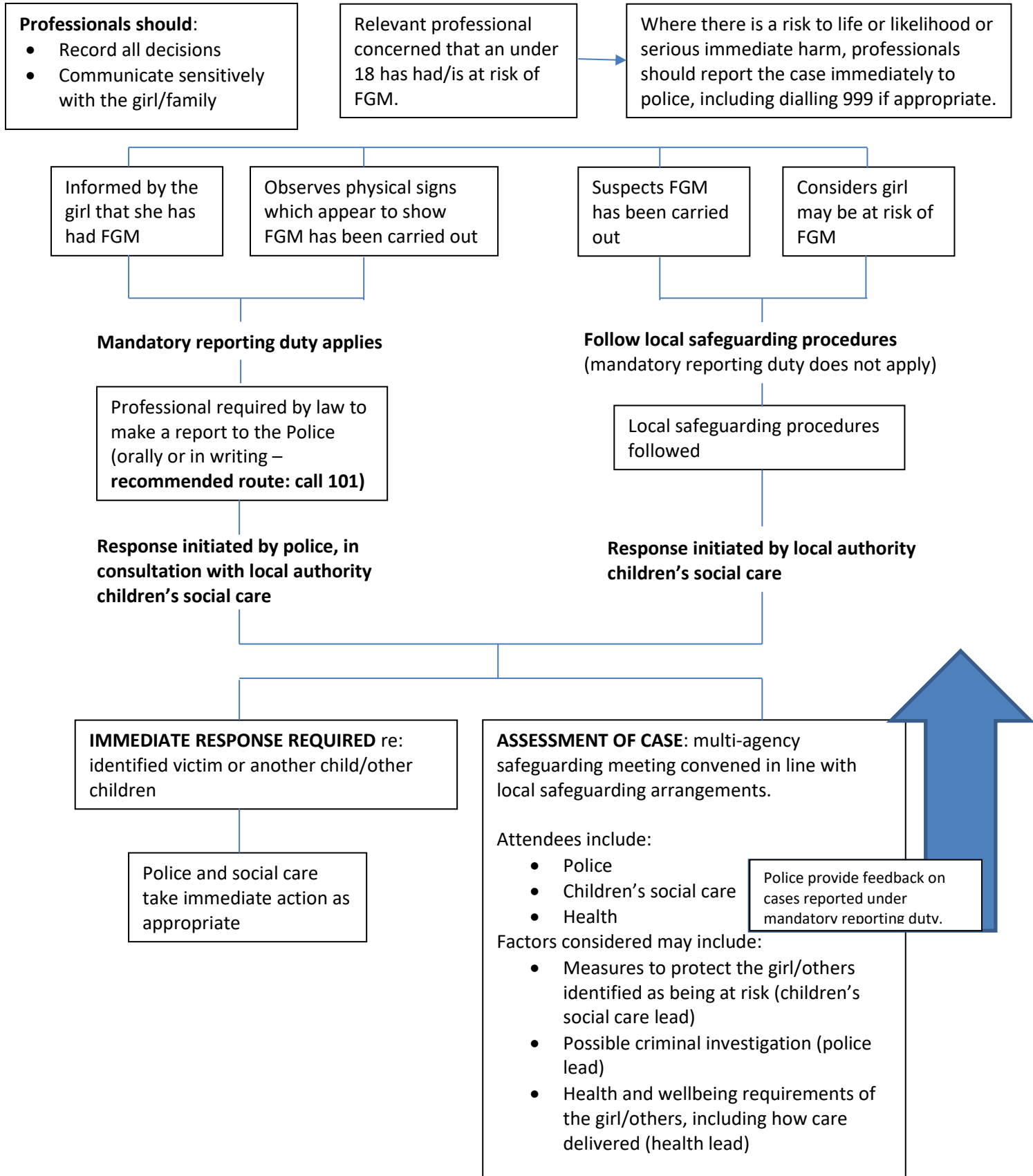
### **The 'appropriate adult' means, in the case of a child:**

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
  - a. a police officer;
  - b. employed by the police;
  - c. under the direction or control of the chief officer of a police force; or
  - d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

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

Appendix B – FGM Reporting Process Map



Appendix C – Main Issues within our locality				
Academy / Local Authority	Main issues identified in the area	How our curriculum addresses these issues	Training staff have received to address these issues	How our Academy promotes positive messaging about tackling these issues with key stakeholders
Beanfield Primary Academy Northamptonshire	<ul style="list-style-type: none"> <li>• Neglect</li> <li>• Domestic Abuse</li> <li>• Parental Mental Health.</li> <li>• Child Mental Health</li> <li>• Poverty</li> <li>• Physical Abuse</li> <li>• SEND/SEMH</li> </ul>	<p>Contact with local services and professionals i.e. school nurses, NSPCC, PHSE lessons, assemblies, wellbeing week. Regular safety e-safety briefings for parents with newsletters providing details of support for families and individuals. Children have open door access to the Wellbeing Office and Rainbow Room for all of their pastoral and safeguarding needs.</p>	<p>Tea break Guides distributed, annual training, DSL specialist training, regular DDSL/DSL meetings, regular updates to staff on pressing issues identified, regular training for DSLs and DDSLs on current topics to enhance knowledge.</p>	<p>Letters home, information sharing on social media, website, and open door policy for all to talk though any issues. Class Dojo is in use promoting positive parent/staff relations.</p>
Compass Primary Academy Northamptonshire	<p>Parental Mental Health Neglect Poverty Child Mental Health/Wellbeing SEND/SEMH</p>	<p>Protective Behaviours programme delivered to all year groups. Assembly schedule has planned opportunities to address these contextual issues. 'The Hub' provision to support vulnerable students and Wellbeing Office, both with open-door policy to pupils. Whole school 'Zones of Regulation' scheme adopted. PSHE scheme of work.</p>	<p>Statutory safeguarding training refresher and regular training sessions throughout the year, reflecting contextual issues identified and any changes to legislation and/or practice. Regular Safeguarding updates for all staff through briefings/bulletins. Qualified Adult and Youth Mental Health First Aiders. Pastoral/key staff are trained to</p>	<p>Website. Social media. Open-door policy. Parent drop-in sessions/ workshops. National Online Safety – membership with parent access. Curriculum newsletters.</p>

		<p>1:1 and small group targeted mentoring programmes. Parental workshops. Liaison with local and national organisations (NSPCC/Service Six/Police) to provide education and workshops around specific topics for children. Regular online safety support/education. Child-friendly Safeguarding guidance.</p>	<p>deliver Drawing &amp; Talking and Protective Behaviours programmes. Targeted CPD for DSL/DDSL and other relevant key staff in line with Trust Learning and Development Framework. This information is then cascaded to all relevant staff. Bespoke training and resources from organisations such as TaMHS and National Online Safety.</p>	
<p>Gretton Primary Academy Northamptonshire</p>	<ul style="list-style-type: none"> <li>• Online messaging, children having unrestricted access to the internet and gaming at home.</li> <li>• Parents with mental health issues.</li> <li>• Many issues arise at the local park (which backs onto the school) at weekends and evenings which spill over into school.</li> </ul>	<p>PSHE curriculum, E Safety week, assemblies, newsletters, parent workshops, support for parents from pastoral support assistant. Leaflets made by children to promote online safety and to explain how chn can keep themselves safe. Annual assemblies with NSPCC. External speakers brought in to work with upper KS2 around online safety, peer pressure, drugs.</p>	<p>Statutory safeguarding training for all DSLs. Two x Advanced DSL trained staff. SG is standing item on weekly staff briefings. Adult and Youth Mental Health First Aid trained staff. School has newly trained Emotional Literacy Support Assistant (ELSA) to support children and families. Pastoral staff are trained in Lego Therapy, Protective Behaviours, Volcano in my tummy. 3 staff have pastoral roles as part of their contracts.</p>	<p>School Facebook page – closed group, website, newsletter, parent workshops. National Online Safety newsletters shared with parents.</p>

			Tea Break guides and Andrew Hall SG briefings distributed to all staff.	
Oakley Vale Primary School Northamptonshire	<ul style="list-style-type: none"> <li>• Online Safety</li> <li>• Child Mental Health</li> <li>• Child on Child Abuse</li> </ul>	<ul style="list-style-type: none"> <li>• PSHE Curriculum</li> <li>• Protective Behaviours sessions delivered to all year groups</li> <li>• ‘The Dome’ structured wellbeing interventions in school for vulnerable students</li> <li>• Individualised, bespoke support for students</li> <li>• Workshops</li> <li>• Assemblies</li> <li>• Working with external agencies e.g. School Nursing, Arson Task Force, Young Carers</li> </ul> <p>Liaison between DSL, Computing Lead and PSHE Lead to inform curriculum planning based on emerging themes</p>	<ul style="list-style-type: none"> <li>• Safeguarding training and regular updates for all staff via 3 - point weekly briefing</li> <li>• Protective Behaviours training for specific staff and overview for all staff</li> <li>• DSL specialist training</li> <li>• Trained Youth and Adult Mental Health First Aiders.</li> <li>• Emotional Literacy Support Assistant (ELSA).</li> <li>• Brooke Traffic Light Tool trained staff.</li> <li>• Senior Mental Health Lead Training completed by Principal</li> <li>• Drawing and Talking training for specific staff</li> <li>• Online Safety Training for all staff</li> </ul>	<ul style="list-style-type: none"> <li>• National Online Safety Membership</li> <li>• Online Safety Workshops for parents of students identified as vulnerable</li> <li>• Parent workshops/drop ins related to identified safeguarding themes.</li> <li>• Social Media</li> <li>• Pupil Leadership opportunities specifically related to wellbeing</li> <li>• Promotion of Early Help Assessments and opportunities</li> <li>• Website &amp; Signposting</li> <li>• Governors receive weekly Safeguarding updates, termly reports and meet regularly with DSL</li> <li>• Open door policy</li> <li>• Timetable of scheduled parental engagement opportunities</li> </ul>
Peckover Primary School Cambridgeshire	<ul style="list-style-type: none"> <li>• Neglect</li> <li>• Physical chastisement</li> <li>• Domestic violence</li> </ul>	PSHE curriculum, Annual talk form NSPCC ‘PANTS’ agenda and PANTS/pantasaurus	Safeguarding training, DSL specialist training, regular staff briefings, trained	Open door policy, trusting relationships built with parents. Encouraging parents



	<ul style="list-style-type: none"> <li>• Substance and alcohol abuse</li> <li>• Adult mental health issues</li> <li>• Online bullying/grooming</li> <li>• County lines</li> <li>• SE prevalent in the area</li> </ul>	<p>video shown in class regularly.</p> <p>Childline talk in assembly.</p> <p>Childline posters around school.</p> <p>e-safety updates and information for parents on newsletters with latest information + website.</p> <p>Online safety lessons and assemblies.</p> <p>Child voice in child council. Mental health info on website. Mental health and wellbeing policy. Pastoral base for children to drop in, nurture sessions to raise self-esteem and resilience, Forest schools for mental well-being.</p> <p>Senior mental health lead training in place with a plan to liase with PSHE lead in training and curriculum mental health issues. PSHE and computing lead/DSL liaise regarding lesson delivery.</p> <p>Liaison with external agencies regarding relevant support and needs.</p>	<p>ELSA pastoral team, regular LA training updates for DSL's on emerging issues such as County Lines, CSE, our own designated Early Intervention family worker.</p> <p>Online safety lead training for EF.</p> <p>Senior mental health lead training.</p> <p>DSL are building a network of contacts around local area concerns e.g. county lines.</p> <p>Safeguarding governor regularly shares updates around local issues e.g. SE.</p>	<p>to come and talk to us in school.</p> <p>Class dojo communication</p> <p>Home visits</p> <p>Support with signposting as necessary</p> <p>Referrals made to external agencies e.g. adult mental health</p> <p>Social media</p> <p>Website information</p> <p>Weekly newsletters with signposting.</p> <p>Coffee mornings to specifically target areas of concern.</p> <p>In house FW delivers virtual workshops and offers weekly drop in sessions for parents.</p> <p>One to one support meeting for parents as required.</p> <p>In house foodbank, uniform swap, money for trips and swimming as well as shoes.</p> <p>Refer to external financial charities and services.</p>
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<p>Brooke Weston Academy</p>	<p>CCE/ County lines / Knife crime</p> <p>Domestic Abuse</p> <p>Mental health</p> <p>Drugs and alcohol</p> <p>Harmful sexual behaviour</p>	<p>PD lessons</p> <p>IT lessons</p> <p>Assemblies</p> <p>Workshops</p> <p>Special assemblies</p> <p>Tutor time activities</p> <p>Working with local</p> <p>How to be happy campaign</p> <p>Holiday care pack</p> <p><b>Using local agencies, including:</b></p> <p>School Nurse</p> <p>PCSO</p> <p>Local counselling services</p> <p>CAMHS</p> <p>NGAGE</p> <p>Aquarium</p> <p>CIRV</p>	<p>Annual KCSIE part 1 training</p> <p>Whole staff safeguarding training</p> <p>DSL specialist training</p> <p>Regular staff briefings</p> <p>Annual National Online Safety training</p> <p>Prevent training</p> <p>Regular Teams safeguarding updates</p> <p>Tea break guides</p>	<p>#MindfulMonday-weekly mental health awareness tips</p> <p>School website</p> <p>Social media</p> <p>Regular emails</p>
<p>Corby Business Academy Northamptonshire</p>	<p>CCE, Vaping, CSE</p> <p>Self-Harm</p> <p>Online Safety</p> <p>Peer on Peer abuse (sexualised comments/Online Mental health Harmful sexualised behaviour</p>	<p>PD Lessons, Tutor time interventions for online safety (peer on peer abuse). Interventions with Steve Coles (PCSO) - knife crime, Assemblies, Newsletters, Workshops with Target for self-harm and healthy relationships</p> <p>Corby contextual safeguarding meetings</p> <p>MDI meetings</p>	<p>Safeguarding training, Protective Behaviours training, DSL specialist training, regular staff briefings, CPD, E-bulletins, Student Safeguarding Profiles</p> <p>Whole school safeguarding RAG (HoY)</p> <p>School councillor appointed</p>	<p>Social media, website.</p> <p>Open evenings</p> <p>Reception posters and leaflets</p> <p>PCSO</p> <p>Communication with parents</p> <p>Meetings</p> <p>EHA's</p> <p>Student care room</p> <p>Staff CPD to increase vigilance</p> <p>Curriculum – PD lessons/tutor time.</p> <p>PCSO</p> <p>Awareness days/ weeks</p> <p>Corby Contextual safeguarding meetings</p> <p>Support with uniform/food vouchers</p> <p>Home visits</p>

				Parental communication
Corby Technical School Northamptonshire	Online safety Domestic Violence Mental Health Contextual Safeguarding in local area i.e., risk of knife crime, gangs and criminal exploitation	PD lessons Mental Health Support Hub Delivery to HOY and assemblies all year groups Protective Behaviours interventions Themed assemblies/workshops PCSO Safer Community/County Schools Challenge RSE curriculum Outside agency support: Aquarius Service Six Youth Works OPFCC/Ace CIRV CAMHS	KCSIE-annual training (whole staff) DSL specialist training National Online Safety training Safeguarding CPD through the National College Safeguarding updates Safeguarding assemblies Protective Behaviours Brook Traffic Light – Harmful Sexual Behaviour Senior Mental Health Lead	Letters home Contextual Safeguarding Meetings disseminated Key Stakeholder Information - plans identified Mental Health Awareness Week School website Posters to identify DSL's and Mental Health First Aid staff Social media National Online Safety
Kettering Science Academy North Northamptonshire	Domestic Abuse Mental Health Neglect CSE/CCE County lines and gangs Knife crime Child on Child Abuse Harmful Sexual Behaviour Online safety	PSHE lessons Assemblies Knife crime workshops Workshops with external agencies Drop down days Protective Behaviours 5 Ways to wellbeing Therapy Dog Wellbeing Drop In sessions Academy Counsellor Academy Nurse Anti-bullying programme LGBTQ+ Group	Safeguarding training DSL specialist training Staff briefings Staff bulletin, induction training for new staff, Termly CPD sessions SLT Briefings Individual training delivered by specialists e.g. OPFCC Protective Behaviours	School Website Working with county initiatives such as CIRV, NCC KSA Food Bank Uniform Bank Local Governing Board Parent Groups PCSO Mental Health Awareness Week Anti-Bullying Week Pride Month Safeguarding Newsletter

		Computing curriculum	Mental Health First Aiders Mental Health DSL	
Thomas Clarkson Academy Cambridgeshire	Mental Health Self Harm POPA Bullying Drugs/Alcohol Home Issues	PSHE lessons Assemblies Newsletters School web site Pastoral specific support Mentoring Programme (TFTF) Thrive Counselling Service Well-being Dog	Safeguarding training LA:DSL specialist training Weekly staff briefing Staff quick reference booklet Safeguarding Staff weekly Mental Health Lead Working with angry children DV Lead training Brook Traffic Light Tool Risk Assessment Training/Safety Planning for DV Working Together training	School Social media, Website Information Display Boards (Public Viewing) LGB agenda item Parental text message service Personal Parental Communication Food Bank/Food Parcel Uniform Bank Collaboration with Police

## Appendix D – Equality Impact Assessment

<b>Name of Assessment</b>	Safeguarding and Child Protection Policy
<b>Name of completing officer</b>	
<b>Date of Assessment</b>	01.09.2022
<b>Approved by</b>	
<b>Date of Approval</b>	
<b>Review Date</b> (if applicable)	

The Public Sector Equality Duty places a general duty on all public bodies to have due regard to the need to achieve the objectives set out under s149 of The Equality Act 2010;

- To eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under The Equality Act.
- To advance equality of opportunity for those covered by The Equality Act
- To foster good relations

We do this by undertaking Equality Impact Assessments (EIAs) to help us consider and understand the implications of policies and decisions on people with protected characteristics. It is a way to make sure individuals and teams think carefully about the likely impact of their work on employees and take action to improve activities, where appropriate.

Part 1 should be completed to determine if a full EIA is needed. If it is determined that a full EIA is needed, then section 2 should also be completed.

Guidance on the toolkit is set out in Appendix 1

All assessments must be approved and included as an appendix to any written policy.

## Part 1 – Screening

The following questions should be completed to determine if the full EIA is required.

- If you answer **YES** to **any** of the screening questions, complete Part 2 Equality Impact Assessment
- If you answer **NO** to **any** of the screening questions, provide supporting evidence that explains your answer
- If you answer **NO** to **all of** the questions, include the following statement within the policy “This policy / project was screened for impact on equalities on [insert date]. The following evidence [Evidence] has been considered. No full equality impact assessment is required.”

Question	Yes/No	Include any explanation required
1. Does the policy affect employees or service users? <i>(A potential to affect a small number of people in a significant way is as important as a potential to affect many people)</i>	Yes	The policy applies to all staff and students.
2. Are there any aspects of the policy that could contribute to equality or inequality?	Yes	The policy outlines roles and responsibilities and processes for ensuring children and young people are safe and protected from harm (physical and/or mental)
3. Does it relate to an area where there are known inequalities? <i>(for example, disabled people’s access to public transport, the gender pay gap, racist or homophobic bullying in schools, educational attainment of Gypsies and Travellers, etc).</i>	Yes	Yes Outcomes for students with special educational needs and/or disabilities.
4. If this is an amendment of an existing policy, was the original policy impact assessed?	Yes, Yes	This is an amendment due to statutory changes (Keeping Children Safe in Education September 2022).
<b>Is an Equality Impact Assessment needed?</b>	Yes	

## Part 2 – Equality Impact Assessment

### Summary of aims and objectives of the policy / activity / event etc being assessed

*Set out what provision is currently in place and who the current stakeholders are.*

*What is the proposal to be considered, or what changes are being made to the current provision/policy/activity?*

The Brooke Weston Trust commits to providing an environment which safeguards and promotes the welfare, safety, health and guidance of our students. The Brooke Weston Trust recognises the importance of the contribution it can make to protecting and supporting students across its academies.

The policy covers legal duties as set out in Keeping Children Safe in Education (KCSIE) (September 2022) and Working Together to Safeguard Children (February 2019) and the processes and responsibilities to implement them.

Stakeholders are staff, students, parents/carers, local authority, external agencies, Local Governing Body and BWT governance.

### What involvement and consultation has been done in relation to this policy / activity / event etc?

*Any relevant groups that this has been discussed or consulted with.*

None – statutory policy.

### Who is affected by this policy / activity / event etc? What evidence is there to show the impact?

*Any relevant groups/ individuals that may be affected by this change / new policy etc*

- Students who are vulnerable and/or at risk of significant harm to their physical and mental health are positively affected as they will benefit from processes and resources in place so their needs are met within the resources that each academy has.
- Parents and carers
- Staff need to be aware of and implement the policy

Tick the relevant box for each line	Based on the above information, what impact will this proposal have on the following groups? *see appendix 2 for more details on how each group may be affected, and appendix 3 for possible impacts		
	Positive / Negative / Neutral	Please explain and give examples of any evidence/data used	Action to address negative impact (e.g. adjustment to the policy)
<b>Sex</b>	Neutral		
<b>Gender Reassignment</b>	Positive	<ul style="list-style-type: none"> <li>➤ Early help for mental health and/or emotional wellbeing.</li> </ul>	
<b>Age</b>	Positive	<ul style="list-style-type: none"> <li>➤ Safe environments.</li> <li>➤ Raised awareness of safeguarding issues.</li> <li>➤ Clear procedures in place.</li> <li>➤ Improved information sharing.</li> <li>➤ Improved record keeping.</li> <li>➤ Voice of the child heard.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Acknowledgement that safeguarding has particular impact for children and young people.</li> <li>➤ Staff becoming over sensitive – training and support.</li> </ul>
<b>Disability</b>	Positive	<ul style="list-style-type: none"> <li>➤ Safe environments.</li> <li>➤ Raised awareness of safeguarding issues.</li> <li>➤ Clear procedures in place.</li> <li>➤ Improved information sharing.</li> <li>➤ Improved record keeping.</li> <li>➤ Voice of the child heard.</li> <li>➤ Early help.</li> </ul>	
<b>Race &amp; Ethnicity</b>	Positive	<ul style="list-style-type: none"> <li>➤ Safe environments.</li> <li>➤ Raised awareness of safeguarding issues.</li> <li>➤ Clear procedures in place.</li> <li>➤ Improved information sharing.</li> <li>➤ Improved record keeping.</li> <li>➤ Voice of the child heard.</li> <li>➤ Early help.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Stereotyping (e.g. FGM, HBA, extremist views) - training</li> </ul>
<b>Sexual Orientation</b>	Positive	<ul style="list-style-type: none"> <li>➤ Early help for mental health and/or emotional wellbeing.</li> </ul>	
<b>Religion or Belief (or No Belief)</b>	Positive	<ul style="list-style-type: none"> <li>➤ Safe environments.</li> <li>➤ Raised awareness of safeguarding issues.</li> <li>➤ Clear procedures in place.</li> <li>➤ Improved information sharing.</li> <li>➤ Improved record keeping.</li> <li>➤ Voice of the child heard.</li> <li>➤ Early help.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Stereotyping (e.g. terrorism, extremist views)- training</li> </ul>
<b>Pregnancy &amp; Maternity</b>	Positive	<ul style="list-style-type: none"> <li>➤ If under age then protective measures will be in place.</li> </ul>	
<b>Other Groups: socio-economic exclusion</b>	Positive	<ul style="list-style-type: none"> <li>➤ Raised awareness of safeguarding issues.</li> <li>➤ Clear procedures in place.</li> <li>➤ Improved information sharing.</li> <li>➤ Improved record keeping.</li> <li>➤ Voice of the child heard.</li> </ul>	



		<ul style="list-style-type: none"> <li>➤ Children’s needs are met.</li> <li>➤ Early help</li> </ul>	
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**Evaluation:**

Question	Explanation / Justification	
Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people?	<p>No – this policy outlines how schools meet their statutory duties in relation to safeguarding and child protection.</p> <p>The policy fully adheres to the guidance as outlined by Keeping Children Safe in Education (KCSIE) (September 2022) and Working Together to Safeguard Children (February 2019).</p>	
Final Decision:	Tick the relevant box	Include any explanation / justification required
5. No barriers identified, therefore activity will <b>proceed</b> .	Yes	
6. You can decide to <b>stop</b> the policy or practice at some point because the data shows bias towards one or more groups		
7. You can <b>adapt</b> or <b>change</b> the policy in a way which you think will eliminate the bias		
8. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore, you are going to <b>proceed with caution</b> with this policy or practice knowing that it may favour some people less than others, providing justification for this decision		