Ormiston Academies Trust

Ormiston Denes Academy Name
Child Protection and Safeguarding policy

Policy version control

Policy type	Statutory and mandatory
Author In consultation with	REDACTED Safeguarding Manager REDACTED Deputy Safeguarding Manager, Aron Whiles Education Designated Safeguarding Leads
Approved by	Executive, July 2022
Trust Board approved	14 July 2022
Release date	1 September 2022
Review	Policies will be reviewed in line with OAT's internal policy schedule and/or updated when new legislation comes into force
Description of changes	▪ Throughout – References to KCSIE 2021 changed to KCSIE 2022 ▪ Throughout all references to peer-on-peer abuse updated to child-on-child abuse (as per KCSIE 2022) ▪ Throughout – All references to pupils/students removed and replaced with child or children to match statutory documents and reduce 'adultification' risks ▪ Throughout – References to DfE Guidance on 'sexual violence and sexual harassment between children in schools and colleges' removed

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as document has now been removed and content subsumed into KCSIE 2022

- Throughout - Domestic 'violence' replaced with domestic 'abuse'
- Throughout - Content order and numbering changed
- Throughout – Minor syntax changes to aid clarity
- Throughout - Reference to regional directors removed and updated to reflect new role in Education directorate
- Throughout -hyperlinks to some documents removed
- Section 2 – additional paragraphs added to reflect changes to KCSIE 2022 in relation to children not being ready to disclose and children with additional vulnerabilities ie SEND requiring additional support when disclosing.
- 3.1changed emphasis on staff being proactively responsible for reading KCSIE part 1.
  3.3 Inclusion of duty for governors and senior leaders to be aware of obligations under the Equality Act including the Public Sector Equality Duty, Human Rights Act to reflect KCSIE paras 81ff
  3.4 Responsibilities of the DSL – new section added to reflect changes to KCSIE 2022 in relation to the requirement for an Appropriate Adult in police investigations following Serious Case review of Child Q; clarification on storage of paper child protection records paragraphs renumbered
- 4.1.1 -additional signposting to academy procedures
- 4.1.2. sentence added to emphasise the need for immediate reporting of concerns about staff
- 4.3.2 – additional paragraph added to reflect changes in KCSIE 2022 paragraph 19 – children may not be ready to disclose
- 4.3.3 - wording change to indicate the need to report swiftly and to use CPOMS for recording
- 5.11.1.- 'at any age 'added to reflect changes in KCSIE 2022
- 5.12.7 – Addition to reflect KCSIE 2022 changes re extra familial harms
- 5.21.7 – Addition to require strengthened digital safeguarding arrangements particularly in relation to parental engagement
- 5.22. - Added detail about school equipment for photography of children
- 5.23.4 - Addition in relation to testing of filtering and monitoring
- 5.29 - New section added to reflect strengthened LGBT guidance in KCSIE 2022 para 202ff
- 7.2 - Addition of online searches as part of recruitment process for shortlisted candidates
- 8.1 - Introductory paragraph added signposting Allegations against staff policy

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	- 8.9 - Paragraphs added to emphasise the importance of reporting low level concerns - *'Managing situations and exit arrangements'* removed as this is now in the 'Allegations against staff' policy - Section 9 – responsibilities for training clarified - Section 11 – clarity about time limits for transference of child protection files - Section 12 – new addition to clarify safeguarding arrangements required when hiring/leasing academy premises - Appendix 1 redesigned to stress the importance of recording actions and rationale for actions - Appendix 2 removed –concerns should be recorded electronically on CPOMs not on paper

Contents

1.Key contacts:

The Principal	REDACTED
The Designated Safeguarding Lead	
The Deputy Designated Safeguarding Lead (s)	
The Designated Lead for Looked after Children is:	
Safeguarding governor:	
The Special Educational Needs Coordinator is	
The OAT Education Director	
OAT Safeguarding Manager	

2.Introduction and Context

2.1. Our responsibilities

Ormiston Academies Trust is committed to safeguarding children and we expect everyone who works in our academy to share this commitment. This policy sets out how Ormiston Denes Academy will deliver these responsibilities.

2.1.1. This policy **must** be read in conjunction with the statutory guidance documents 'Keeping children safe in education' (September 2022), 'Working together to safeguard children' (July 2018), a guide to inter-agency working to safeguard and promote the welfare of children.

2.1.2. Furthermore, we will follow the procedures set out by the [three safeguarding partners in this LA safeguarding partnership: Suffolk County Council, Suffolk Police and Suffolk Healthcare Services.

2.2. Our principles

2.2.1. We believe that our academy should provide a child-centred, caring, positive, safe and stimulating environment that promotes the emotional, social, physical and moral development of the individual child.

2.2.2. We recognise the importance of providing an environment within our academy that will help children feel safe and respected.

2.2.3. We recognise the importance of enabling children to talk openly about anything that worries them and to feel confident that they will be listened to, kept safe and never be made to feel that they are creating a problem for reporting abuse, sexual violence or sexual harassment.

2.2.4. We recognise that children may not feel ready or know how to tell someone they are being abused, exploited or neglected and may not recognise their experiences as harmful.

2.2.5. We recognise that children with additional needs or vulnerabilities including disability and/or sexual orientation or language barriers may require additional support to enable them to tell someone they are being abused.

2.2.6. We ensure that children are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum in line with the DfE's 'Teaching online safety in school (June 2019) DfE external document template (publishing.service.gov.uk)and UKCIS 'Education for a connected world' June 2020 (Education for a Connected World (publishing.service.gov.uk)

2.2.7. We will work with parents to build an understanding of the academy's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

2.2.8. Safeguarding arrangements in our academy are underpinned by two key principles:

- safeguarding is everyone's responsibility: all staff, governors and volunteers should play their full part in keeping children safe; and maintain and attitude of 'it could happen here' and
- a child-centered and coordinated approach: a clear understanding of the needs and views of children

2.3. Scope

2.3.1. In line with the law, this policy defines a child as anyone under the age of 18 years or any child on roll at this academy.

2.3.2. This policy applies to all members of staff in our academy, including all permanent, temporary and support staff, supply staff, governors, volunteers, contractors and external service or activity providers.

2.4. Our Policy

2.4.1. There are 6 main elements to our policy, which are described in the following sections:

- The types of abuse that are covered by the policy
- The signs of abuse that staff and volunteers should look out for
- Roles and responsibilities for safeguarding
- Expectations of staff and volunteers with regard to safeguarding, and the procedures and processes that should be followed, include the support provided to children
- How the academy will ensure that all staff and volunteers are appropriately trained, and checked for their suitability to work within the academy
- How the policy will be managed and have its delivery overseen

2.4.2. Through implementation of this policy, we will ensure that our academy provides a safe environment for children to learn and develop.

2.4.3. The academy will ensure that we facilitate a whole school approach to safeguarding which means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

3. Safeguarding Roles and Responsibilities

3.1. All staff, volunteers and governors have responsibility for the following:

3.1.1. to provide a safe environment in which children can learn

3.1.2. identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm.

3.1.3. to take appropriate action, working with other services as needed.

3.1.4. to keep themselves updated with the systems within the academy which support safeguarding that were explained to them as part of their induction (including the staff Code of Conduct). This includes knowing the role, and working with, the academy's designated safeguarding lead.

3.1.5. to ensure they receive appropriate child protection training which is regularly updated.

3.1.6. In addition to working with the designated safeguarding lead or deputy, staff members should be aware that they may be asked to support social workers to take decisions about individual children.

3.2. All academy staff are responsible for:

3.2.1. knowing who the academy's designated safeguarding lead (DSL) and deputy are

3.2.2. raising any concerns with the designated safeguarding lead and deputy immediately

3.2.3. completing a written safeguarding concern when making a referral. Staff should be clear that this should be done immediately, always on the same day

3.2.4. ensuring that their child protection training is up to date

3.2.5. being alert to the signs of abuse, including child on child abuse and their need to refer any concerns to the designated staff member

3.2.6. maintaining an attitude of 'it could happen here'. When concerned about the welfare of a child, staff members should always act in the interests of the child

3.2.7. knowing the academy's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the designated lead

3.2.8. listening to, and seeking out, the views, wishes and feelings of children and young people

3.2.9. sharing information and working together to provide children and young people with the help they need

3.2.10. referring to the principal any concerns about another member of staff immediately, or if the concerns are about the principal, referring them to the academy's education director who will inform the chair of governors, and director of secondary/primary where appropriate

3.2.11. raising concerns about poor or unsafe practice and potential failures in the academy's safeguarding regime through the academy's *Whistleblowing Policy*.

3.2.12. being aware of [Suffolk County Council's] safeguarding procedures, https://suffolksp.org.uk/concerned/] and ensuring these procedures are followed

3.2.13. seeking early help where a child and family would benefit from coordinated support from more than one agency via [Suffolk County Council's] Multi Agency Safeguarding Hub (MASH)

3.2.14. knowing the academy's procedures for dealing with child-on-child abuse, including sexual harassment and sexual violence between children

3.2.15. reading KCSIE 2022 part 1

3.3. Governors and academy leadership are responsible for:

3.3.1. reading, understanding and applying KCSIE 2022

3.3.2. ensuring that there is an effective Child Protection and Safeguarding Policy in place together with a Staff Code of Conduct, which are provided to all staff

3.3.3. ensuring all staff are given a mandatory induction, which includes clear guidance on their child protection responsibilities and procedures to follow if anyone has any concerns about a child's safety or welfare

3.3.4. ensuring that policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff

3.3.5. ensuring that the academy has an appropriate senior member of staff from the academy leadership team, with appropriate status and authority, funding, resources and support to take the lead in responsibility for safeguarding and child protection; (DSL) and that they receive DSL /level 3 training which is updated every two years

3.3.6. ensuring that they are aware of and follow local procedures related to safeguarding.

3.3.7. ensuring that all governors receive appropriate safeguarding and child protection (including online) training at induction which is updated regularly and at least annually to keep pace with KCSIE updates. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the academy are effective and support the delivery of a robust whole school approach to safeguarding

3.3.8. ensuring that they are aware of their obligations under the Human Rights Act 1998, The Equality Act 2010 including The Public Sector Equality Duty, and their local multi-agency safeguarding arrangements (see KCSIE 2022 Part 2 The management of safeguarding)

3.4. The Designated Safeguarding Lead is responsible for:

3.4.1. managing referrals from academy staff or any others from outside the academy

3.4.2. working with external agencies and professionals on matters of safety and safeguarding

3.4.3. undertaking relevant training and attending update sessions

3.4.4. liaising with the principal to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations This should include being aware of the requirement for children to have an Appropriate Adult (PACE code C 2019)

3.4.5. raising awareness of safeguarding and child protection amongst the staff and parents; and ensuring that child protection information is transferred to the pupil's new school/academy

3.4.6. ensuring that the academy have a nominated governor to liaise with the designated lead for Suffolk and any partner agencies in the event of allegations of abuse made against the principal

3.4.7. ensuring all staff receive the appropriate training, and keep it up to date, in line with advice from Suffolk County Council, Suffolk Police and Suffolk Healthcare Services as part of the Suffolk Safeguarding Partnership.

3.4.8. notifying the Children's Social Care department if there are concerns over unexplained absences of a child

3.4.9. informing the local authority when a private fostering arrangement is in place

3.4.10. managing security within the academy and reviewing it annually

3.4.11. ensuring that important policies, such as those for behaviour and bullying, are kept up to date

3.4.12. keeping all child protection records up to date on CPOMS; including a clear summary of the concern, decisions reached and the rationale behind the decision, details of how the concern was resolved/outcomes

3.4.13. having an overview of the numbers of safeguarding and child protection referrals made, and provide an anonymised report to the principal, and governing body termly

3.4.14. having in place effective ways to identify emerging problems and potential unmet needs for individual children and families

3.4.15. ensuring that the curriculum makes best use of Citizenship and PSHE/RSE opportunities to cover safeguarding issues with children

3.4.16. ensuring at least one person on any appointment panel has undertaken safer recruitment training

3.4.17. ensuring the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required; and ensuring volunteers are appropriately supervised

3.4.18. ensuring procedures are in place to handle allegations against members of staff and volunteers

3.4.19. ensuring there are procedures in place to handle allegations against other children

3.4.20. ensuring that there is support available for staff involved in difficult child protection cases/incidents both at the academy and externally through counselling and/or other services

3.4.21. creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the academy's development

3.4.22. ensuring through the safeguarding curriculum that students know the process of raising a concern (about themselves or a friend/other), that they know the academy's Designated Safeguarding Lead (and deputy), and are aware of other support mechanisms such as ChildLine etc.

3.4.23. taking lead responsibility for promoting the educational outcomes for children who have or have had a social worker

3.4.24. making this policy available to parents and carers as appropriate

3.4.25. ensuring that our staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role

3.4.26. ensuring all staff have regular reviews of their own practice to ensure they improve over time

3.4.27. ensuring any paper records are secure and kept separately from the child's main file in a locked location

3.4.28. fulfilling their duties in line with KCSIE 2022 Annex C

4.Safeguarding Processes and Procedures

The academy will deliver its responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures identified in Suffolk County Council's safeguarding partners policies and procedure guidance, available at https://suffolksp.org.uk/

4.1. How to report any concerns

4.1.1. Clear procedures on the reporting of any concerns are given to all staff/volunteers in the academy. This is done as part of the staff induction training and staff are given a reminder of this annually in refresher training. These procedures can be found via the staff intranet and on the staff shared Google drive.

4.1.2. All concerns should be reported in writing, using the academy's safeguarding concern process (whether online or paper based). Concerns should always be completed as soon as possible, on the same day. Staff should never wait until the next day to complete a safeguarding concern report. Concerns about a member of staff should be reported immediately.

4.1.3. All child protection and/or safeguarding concerns should be reported to James Lowden (Designated Safeguarding Lead). See Appendix 1 for a flow diagram which explains how all disclosures are dealt with at the academy.

4.1.4. The academy takes its responsibility to safeguard young people seriously. Failure to follow these reporting procedures may result in disciplinary action.

4.2. Taking Action

4.2.1. If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to Suffolk County Council Emergency Duty Team on 0808 800 4005, or Police Child Abuse Investigation Team on 03456 061 499 call 999 if you are concerned a child needs immediate protection.

4.2.2. If the child has an injury that requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

4.2.3. The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

4.3. Children's disclosure of abuse

4.3.1. At Ormiston Denes Academy we have a clear procedure for reporting concerns. If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will let the child know that the staff member must pass the information on to the safeguarding team (DSL) in order to offer the proper support that the child requires. Staff members will allow them to speak freely and will not ask investigative questions.

4.3.2. Staff will be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and /or they may not recognise their experiences as harmful. Staff will be aware this could be due to their vulnerability, disability and or sexual orientation or language barriers.

4.3.3. The staff member will tell the child what will happen next. It is the duty of the member of staff to inform the Designated Safeguarding Lead of what has been discussed. The staff member will write up details of their conversation with the child as soon as possible and certainly on the same day, on CPOMS. If CPOMs is temporarily unavailable the academy 'back up' paper procedures should be followed

4.3.4. Information will be shared on a need-to-know basis only. Issues or concerns will not be discussed with colleagues, friends or family unless necessary for the welfare of the child.

4.4. Suspecting that a child is at risk of harm

4.4.1. There will be occasions when staff may suspect that a child may be at risk but have no 'real' evidence. In these circumstances, staff will try to give the child the opportunity to talk. All staff should be aware that children can abuse other children (child on child abuse) and that it can happen both inside and outside of school and online.

4.4.2. Staff should use CPOMS to record these early concerns. Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead, REDACTED

4.4.3. Staff will be aware of the harm caused by child on child abuse including sexual violence or harassment and recognise that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported.

4.4.4. Staff will use the academy's Anti-Bullying Policy where necessary (located on Google drive, under policies & guidance). However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures.

4.4.5. The academy acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our children receive equal protection, we will give special consideration to children that are considered to be vulnerable.

4.5. Notifying parents

4.5.1. The academy will normally seek to discuss any concerns about a child with their parents. The Designated Safeguarding Lead REDACTED or a member of the safeguarding team, will make contact with the parent in the event of a concern, suspicion or disclosure.

4.5.2. However, if the academy believes that notifying parents could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sought from Children's Social Care.

4.6. Referral to Children's Social Care

4.6.1. The Designated Safeguarding Lead or deputy REDACTED will make a referral to Children's Social Care if it is believed that a child is suffering or is at risk of suffering significant harm.

4.6.2. Contacts at Suffolk County Council can be called on 0808 800 4005 or emailed to customer.first@suffolk.gov.uk

4.6.3. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

4.7. Private Fostering

4.7.1. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent, person with parental responsibility or close relative, in their own home, with the intention that it should last for 28 days or more.

4.7.2. Comprehensive guidance on private fostering can be found here 6091-DfES-ChildrensActFostering (publishing.service.gov.uk)

4.7.3. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or are involved in trafficking, child sexual exploitation or modern-day slavery.

4.7.4. We have a duty to notify to the local authority where we are aware or suspect that a child is subject to a private fostering arrangement. Although academies have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the academy. However, it should be clear to the academy who has parental responsibility.

4.7.5. We have a mandatory duty to notify the local authority if we are involved directly or indirectly in arranging for a child to be fostered privately. Notifications must contain the information specified in Schedule 1 of The Children (private Arrangements for Fostering Regulations 2005 and must be made in writing

4.7.6. Academy staff should notify the designated safeguarding lead or deputy when they become aware of private fostering arrangements.

4.7.7. On admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered.

4.8. Reporting directly to child protection agencies

4.8.1 Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police, or the NSPCC if:

4.8.2 The situation is an emergency and the Designated Safeguarding Lead, REDACTED their deputy REDACTED the Vice Principal/Principal are all unavailable REDACTED

4.8.3 They are convinced that a direct report is the only way to ensure the child's safety

4.9 Early help

4.9.1 At Ormiston Denes Academy we also liaise with a wide variety of outside agencies, many of which are able to see children weekly. Examples of the wider agencies we liaise with include; multi-agency team/s, careers services, academy nurse, Child and Adolescent Mental Health Services (CAMHs), Educational Welfare Officer/s (EWO's), our local Police Community Support Officers (PCSO's), the Police and other services. We encourage families, children, and parents to work with these partner agencies also. The provision of early help services should form part of a continuum of help and support to respond to the different levels of need of individual children and families.

4.9.2 Staff and volunteers working within the academy should be alert to the potential need for early help for children. Staff and volunteers should be alert to children with additional vulnerabilities who may benefit from Early Help:

5.Types of Abuse
5.1 Child abuse and types of abuse

5.1.1 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. They may be abused by an adult or adults, or another child or children.

5.1.2 Further information and resources can be found in annexes A, B and part 5 of KCSIE 2022 and xx of this policy – as well as on the google drive safeguarding resources folder, which can also be accessed using the intranet].

5.1.3 All staff must maintain and attitude of 'it could happen here' and ensure any concern, no matter how small is reported. It could be the vital missing piece of the jigsaw that indicates a child is at risk of harm

5.1.4 All staff will receive ongoing training regarding types of abuse including local and national context.

5.1.5 The DSL and/or deputy will respond to all concerns, following local authority procedures and where there is an immediate risk of serious harm to a child will inform the police.

5.1.6 There are four types of child abuse as defined in 'Keeping Children Safe in Education' September 2021 paras 26-30 and Annex A

- physical abuse
- emotional abuse
- sexual abuse
- neglect.

5.1.7 All staff must know what these are and be alert to the signs.

5.2 Safeguarding Issues

5.2.1 All staff must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

5.3 Child Sexual Exploitation and Child Criminal Exploitation – CSE and CCE (see KCSIE 2022 Annex B)

5.3.1 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

5.3.2 Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines (see below), working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

5.3.3 Children can become trapped by this type of exploitation as perpetrators can threaten victims and their families. Staff must recognise that children involved in CCE are vulnerable and are victims themselves and that they may still have been criminally exploited even if the activity appears to have been something they have agreed or consented to

5.3.4 Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

5.3.5 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can take place as a one off or over a period of time and may occur online.

5.3.6 It is important that staff recognise that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too.

5.3.7 Staff must also be aware that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

5.3.8 Staff should be aware that CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17year old's who can legally consent to have sex. Some children believe they are in a genuine romantic relationship

5.3.9 As a result, many children and young people who are victims of sexual exploitation do not recognise themselves as such which can be an additional barrier to disclosure.

5.3.10 Staff will receive training and updates on CSE and CCE to ensure awareness of and mitigate these additional difficulties to ensure children receiving appropriate intervention and support at the earliest opportunity.

5.3.11 CSE is a form of child sexual abuse and can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media

5.3.12 The local response and support for CSE and CCE can be found here and here respectively

5.4 Serious Violence

5.4.1 All staff should be aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, as significant decline in performance, signs of self harm or significant changes in well-being, signs of assault or unexplained injuries.

5.4.2 Unexplained gifts or new possessions are also potential indicators that children have been approached by or are involved with criminal networks or gangs and may be at risk of CCE.

5.4.3 All staff should be aware of the range of risk factors which increases the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending such as theft or robbery.

5.4.4 Staff will receive training and updates on serious violence and have access to information and resources to support development of their knowledge, skills and understanding.

5.4.5 Any concerns, no matter how small must be reported using the academy's usual procedures. The DSL or deputy will follow the local authority safeguarding procedures. Where there is a risk of imminent harm an immediate referral to the police should be made.

5.5 County Lines

5.5.1 County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

5.5.2 Signs to look out for:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

5.5.3 Where staff have a concern around county lines they should inform the DSL immediately who will follow the local authority safeguarding procedures. Where there is a risk of imminent harm an immediate referral to the police should be made.

5.5.4 Suffolk County Council County lines information/links are found here

5.6 Honour-Based Abuse (HBA)

5.6.1 So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

5.6.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (or deputy). Professionals in all agencies, and individuals and groups in

relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

5.6.3 Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency. Where FGM has taken place please refer to section 5.7 of this policy. (see below)

5.7 Female Genital Mutilation

5.7.1 Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

5.7.2 All staff should speak to the DSL or deputy with regard to any concerns about FGM

5.7.3 Teachers should be aware that there is a specific legal duty upon them that, if in the course of their work, they discover that an act of FGM appears to have been carried out on a girl under 18 years, they must report this to the police (see annex B of KCSIE for further details)

5.7.4 Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out and discuss any such cases with the Designated Safeguarding Lead and children's social care. The duty does not apply in relation to at risk or suspected cases though staff will always refer to the DSL to take the next appropriate steps.

5.8 Forced Marriage

5.8.1 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.

5.8.2 Forced marriage is recognised as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

5.8.3 An arranged marriage is not the same as a forced marriage. In an arranged marriage, the families take a leading role in choosing the marriage partner, but both parties are free to choose whether to enter into the marriage or not.

5.8.4 Where staff or volunteers have any reason to suspect that someone is experiencing pressure or being forced in marriage, they must report this to the DSL through the academy process.

5.8.5 For more information on forced marriage see Annex B in KCSIE

5.9 Breast Ironing/Flattening

5.9.1 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.

5.9.2 Staff or volunteers worried about the risk of breast ironing in the academy should refer through the appropriate channels to the Designated Safeguarding Lead as soon as possible who will make a referral to children's services. If staff or volunteers are concerned that the girl is in immediate danger, contact the police by calling 999.

5.9.3 The DSL will need to contact the Foreign and Commonwealth Office if the girl has been taken abroad:

5.9.4 For more information on breast ironing or flattening see KCSIE 2022, Annex B.

5.10 Preventing Radicalisation

5.10.1 The Counter-Terrorism and Security Act, 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism "the Prevent duty".

5.10.2 Where staff are concerned that children are developing extremist views or show signs of becoming radicalised they should discuss this with the Designated Safeguarding Lead and be recorded on CPOMS.

5.10.3 The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

5.11 Channel

5.11.1 We understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

5.11.2 We use the curriculum to ensure that children understand how people with extreme views share these with others to radicalise others, especially using the internet.

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

5.12 Child on Child Abuse

5.12.1 All staff should be aware that children can abuse other children at any age and that it can happen both inside and outside of school and online

5.12.2 All staff must know the indicators and signs of child-on-child abuse, know how to identify it and respond to reports of it. This includes sexual violence and sexual harassment.

5.12.3 All staff must be aware that even if there are no reports it does not mean child on child abuse is not happening. It may be the case that it is just not being reported.

5.12.4   Staff must be vigilant and if they have any concerns they should speak to the DSL or deputy

5.12.5   We will minimise the risk of all types of child-on-child abuse by [ensuring that rules, expectations, types of harm and the impact on others forms a key part of our personal development curriculum, robust behavior policies, duty coverage, multiple reporting mechanisms, staff training, including vulnerable group risk factors, CCTV and intervention and support programmes are in place.]

5.12.6   All staff must challenge inappropriate behaviours between children including, but not limited to:

- Bullying (including cyberbullying, prejudiced based and discriminatory bullying, inappropriate touching).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault which may also include an online element.
- Sexual harassment such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery).
- Up skirting – taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals.

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

5.13   Child on child sexual violence and sexual harassment

5.13.1   This section of the policy must be read in conjunction with KCSIE 2022 Part 5

5.13.2   Sexual violence and sexual harassment can happen anywhere, Staff should be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely that it will be perpetrated by boys.

5.13.3   All staff should be aware of and respond appropriately to all reports and concerns.

5.13.4 The academy has a zero tolerance approach to sexual violence and sexual assault. It is never acceptable, will not be tolerated and will never be passed off as 'banter' 'just having a laugh' 'part of growing up' or 'boys being boys.

5.13.5 We recognise that sexual violence and sexual harassment exists on a continuum, may overlap and can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

5.13.6 We also recognise that sexual violence and sexual harassment can occur online and face to face (both physically and verbally) and is never acceptable. All staff and volunteers will maintain an attitude of 'it could happen here'.

5.13.7 We will ensure that all children are taught, in an age appropriate way, about sex and relationships and understand that the law is in place to protect children rather than criminalise them.

5.13.8 We recognise that some children will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the academy's Behaviour Policy.

5.14 Responding to reports of sexual violence and sexual harassment

5.14.1 Allegations may be made against children by other children in the academy, which are of a safeguarding nature.

5.14.2 Safeguarding issues raised in this way may include sexual violence, sexual harassment, sexual exploitation, physical abuse, emotional abuse.

5.14.3 We will support and reassure the victims that they are being taken seriously and that they will be supported and kept safe. We will ensure that victims are never given the impression that they are creating a problem or made to feel ashamed by reporting sexual violence or sexual harassment.

5.14.4 We will ensure that we are aware of intra familial harms and support is provided for siblings following incidents.

5.14.5 Abuse that occurs online or outside of the academy will not be downplayed and will be treated equally seriously.

5.14.6 All staff will be trained in how to manage a report.

5.14.7 The academy recognises that certain children may face additional barriers to disclosure because of their vulnerability, disability, sex, ethnicity and/or sexual orientation and that procedures will ensure that all children are able to report easily.

5.15   Risk Assessment

5.15.1   Where there has been a report of sexual violence the DSL or deputy will make an immediate written risk and needs assessment which will be kept under review and will work to engage with children's social care and specialist services as required.

5.15.2   Action will be taken immediately to protect the victim, alleged perpetrator(s) and other children in the academy. The academy will not wait for the outcome or even the start of any police investigation before taking action to protect the children involved.

5.15.3   Any relevant action under the academy behaviour policy will be considered.

5.15.4   Where there has been a report of sexual harassment the need for a risk assessment will be considered on a case-by-case basis.

5.15.5   The risk and needs assessment will consider

- The victim, especially their protection and support.
- Whether there may have been other victims.
- The alleged perpetrator(s).
- All the other children (and, if appropriate adults and staff) at the academy, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms.

5.16   Action following a report of sexual violence and/or sexual harassment

5.16.1   When a report has been received the DSL or deputy will consider the following:

- The wishes of the victim.
- The nature of the alleged incident (s) including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed.
- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children.
- If the alleged incident is a one off or a sustained pattern of abuse.
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers.
- If there are any ongoing risks to the victim, other children, or staff.
- Intra familial harms.
- Support for siblings.
- Other related issues and the wider context including links to CSE and CCE.

5.16.2   Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) and any other children involved or impacted.

5.16.3   The DSL will consider 4 options when managing a report

- Manage the report internally
- Provide support through the local Early Help process
- Make a referral to Children's Social Care
- Report to the police

5.16.4 All concerns, discussions, decisions and reasons for decisions will be recorded on CPOMS

5.16.5 The academy will ensure that if a child is convicted or receives a caution for a sexual offence the risk assessment will be updated to ensure relevant protections are in place and needs are being met.

5.16.6 If a report is assessed as being unsubstantiated, unfounded, false or malicious the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been by someone else and that this is a cry for help. In such circumstances the DSL may make a referral to children's social care. An Early Help process may be initiated

5.16.7 If a report is deliberately invented or malicious, the academy will consider what disciplinary cation is appropriate as outlined in the behaviour policy.

5.17 Ongoing response – safeguarding and supporting the victim

5.17.1 The following principles will help shape and decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim will be paramount.
- Consideration of the age and development stage of the victim, nature of the allegations and the potential risk of further abuse.
- The victim will never be made to feel they are the problem or made to feel ashamed.
- Proportionality of response. Support will be tailored on a case-by-case basis.
- A holistic approach with an awareness of health needs associated with sexual assault including physical, mental and sexual health problems and unwanted pregnancy.

5.18 Academy procedures

[An outline of the academy's procedures and response to incidents such as these are as follows:

- Report logged and processed by Designated Safeguarding Lead

- Alleged victim pupil voice sought, to help inform follow up, in conjunction with professional and legal obligations

- Inform parent/carers, report to police, social care, or consider early help referral, depending on severity or frequency of incident.

- Alleged perpetrator voice sought (in conjunction with any advice or guidance otherwise from external agencies if appropriate)

- Risk and contact assessment undertaken – consider factors including (but not limited to, class, social spaces, transport, online activity) to inform curriculum provision and strategy – this may include timetabling, access to certain areas, consequences and interventions (for both victim and perpetrator)

- Review strategy in conjunction with outcomes of external referrals and/or subsequent risk scaling

- Agencies we may use include, CEOP, NSPCC, Suffolk's Diversion Programme and engagement with police community support officer, or direct crime report to the police.

5.19 Domestic Abuse and young people

5.19.1 This form of abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

5.19.2 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).

5.19.3 Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

5.19.4 We encourage children to come forward by raising awareness of the issue and teaching the children about health relationships through SRE, the wider curriculum and modelling behaviour in the academy.

5.20 Adolescent to Parent Violent Abuse

5.20.1 APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach.

5.20.2 What to look out for when a child is witnessing domestic abuse:

- The emotional responses of children who witness domestic violence may include fear, guilt, shame, sleep disturbances, sadness, depression, and anger (at both the abuser for the abuse and at the victim for being unable to prevent the abuse).
- Physical responses may include stomach aches and/or headaches, bedwetting, and loss of ability to concentrate. Some children may also experience physical or sexual abuse or neglect. Others may be injured while trying to intervene on behalf of the victim or a sibling.
- The behavioural responses of children who witness domestic abuse may include acting out, withdrawal, or anxiousness to please. The children may exhibit signs of anxiety and have a short attention span which may result in poor academic performance and attendance. They may experience developmental delays in speech, motor or cognitive skills. They may also use

violence to express themselves displaying increased aggression with peers or family. They can become self-injuring.

- If a child discloses that they have witnessed domestic abuse, or an adult linked to a child in the academy discloses that they are being abused, follow the academy safeguarding procedures and report your concern to the designated safeguarding lead.

5.21 Digital Safeguarding (also known as-online safety/E-safety)

5.21.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within digital safeguarding is considerable but can be categorised into four areas of risk. These are content, contact, conduct, commerce. (cf KCSIE para 134ff).

5.21.2 We will ensure digital safeguarding is a running and interrelated theme when devising and implementing policies and procedures. This will include considering how digital safeguarding is reflected, as required, in all relevant polices. In addition, we will consider digital safeguarding whilst planning the curriculum, staff training, the role of the DSL and parental engagement.

5.21.3 Whilst the DSL has lead responsibility for digital safeguarding, we will ensure there is support, if required, for operational digital safeguarding and the appropriate technical and safeguarding knowledge, skills and understanding to be able to quality assure systems, policies and processes, train staff and contribute to the safeguarding curriculum is available.

5.21.4 We will keep our digital safeguarding processes and procedures under review through our digital safeguarding group using an independent tool such as the SWgFL 360 safe process 360 Degree Safe - Online Safety Review Tool | SWGfL

5.21.5 We are thoroughly committed to improving children's online safety awareness at Ormiston Denes Academy. Our Technology Acceptable Use policy is signed up to by all children and staff annually.

5.21.6 If a child, parent/carer or member of staff has a concern relating to online safety children are encouraged to report it. They can report it directly to the DSL/Deputy DSL at the academy.

5.21.7 Through our regular communication with parents, we will reinforce the importance of children being safe online, explain what systems we use to filter and monitor online use, explain what children are being asked to do online including sites they will be asked to access and who from the academy (if anyone) their child is going to be interacting with online.

5.22 Photography and images

5.22.1 The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

5.22.2   To protect children, we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications).
- Seek parental consent.
- Use only the child's first name with an image.
- Ensure children are appropriately dressed.
- Encourage children to tell us if they are worried about any photographs that are taken of them.
- Remove photographs where requested.
- Only use school equipment when taking photographs of children.
- Comply with GDPR.

5.22.3   Parents, carers or relatives may only take still or video photographic images of children in the academy or on academy-organised activities with the prior consent of the academy and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

5.23   Filtering and monitoring

5.23.1   The academy will limit children's exposure to risks from the academy's IT system

5.23.2   Ofsted concluded in 2013 that "Pupils in the schools that had 'managed' systems had better knowledge and understanding of how to stay safe than those in schools with 'locked down' systems. Pupils were more vulnerable overall when schools used locked down systems because they were not given enough opportunities to learn how to assess and manage risk for themselves." The Trust will take this approach.

5.23.3   The academy has in place appropriate filtering and monitoring systems that are in line with the recommendations in the UK Internet Centre document Appropriate Filtering for Education Settings Appropriate Filtering for Education settings 2021_2.pdf (d1afx9quaogywf.cloudfront.net)

5.23.4   The academy will conduct regular, at least termly, tests of the filtering and monitoring provision in the academy and report on findings to the governing body.

5.24   Sharing of nudes and semi-nudes

5.24.1   This section of the policy must be read in conjunction with KCSIE paras 134 ff and the UKIS advice 'Sharing nudes and semi-nudes advice for education settings working with children. Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk) Further resources and guidance can also be found – (*signposted via the safeguarding page of our website, as well as the separate digital safeguarding page.*

5.24.2   All staff will be trained in digital safeguarding and will have a role in educating and protecting children about online harms

5.24.3 All staff will be available and approachable for children to make disclosures which will then be referred to the DSL for further action

5.24.4 We will seek to prevent children from online harms through educating them about the laws and potential consequences of activity online.

5.24.5 Digital safeguarding may be addressed through, during lessons, specialised digital safeguarding sessions, PHSE, flexi-learning weeks and assemblies and use of the INEQ Safer Schools app

5.24.6 Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery.
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children under the age of 18.
- 'sexting'. Many adults may use this term, however some children interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images • image-based sexual abuse. This term may be used when referring to the nonconsensual sharing of nudes and semi-nudes.

5.24.7 Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

5.24.8 In dealing with cases of sending of nudes, semi-nudes etc the response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of any children involved.

5.24.8.1 We will:

- Outline our expectations and explain the rules of having a mobile, tablet or smartphone;
- Ask students what they feel is acceptable to send to other people then discuss appropriate images and the dangers of inappropriate images (listed above);
- Make sure children are comfortable saying no, that they know their body is private and being asked to share explicit images is inappropriate and illegal;
- Explain to children about the importance of trust and consent in a healthy relationship (*see Sex and Relationships policy);
- Tell children that it's not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they're unhappy about;
- Tell children what can happen if things go wrong through real life examples such as television programs or news stories as far as possible;
- Ask children about the 'Granny rule' would you want your Granny to see the image you're sharing?

- Talk about whether a person who asks for an image from you might also be asking other people for images;
- Discussion revenge sending of images after relationships have broken down or a friend has done something as a joke and lost control of the image etc.
- Let children know that they can speak to us if this ever happens and that disclosures will be treated confidentially and without embarrassment and support will be given. Staff will react calmly and listen to the concerns of the child and explain that they must share the information confidentially with the DSL;
- Provide details of sources of support and coping strategies if the child finds themselves in an uncomfortable position such as the Zipit App to control the conversation with funny images to prevent further request for pictures or ChildLine if the situation has got out of control.

5.24.9   When a child has been affected by the sending of an explicit image staff will:

- Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious talking about this.
- Recognise that they themselves may feel shocked, upset, angry, confused or disappointed while listening to the child.
- Give themselves time to process the information, remembering that the child will be watching their reactions.
- Reassure the child that they are not alone.
- Listen and offer support – they're probably upset and need help and advice, not criticism;
- Not shout or make them feel like it's their fault;
- Will not ask questions like "why have you done it?" as this may stop them from opening up;
- Discuss the problem and the wider pressures that they may face, to help them to understand what's happened and understand any wider safeguarding concerns;
- Assure the child that they will do all they can to help and explain that they will seek the support of the DSL
- Remind them that they can always talk to Childline or another trusted adult if they are not comfortable talking directly to the staff member.

5.24.10   If a child has shared an explicit image, the DSL or deputy will:

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else.
- Support the victim to get the images removed by contacting the Internet Watch Foundation.
- Assess the situation for wider safeguarding concerns and agree who will be contacted and when then contact parents/police/CEOP/ as appropriate to the case.
- Contact the Child Exploitation and Online Protection Centre (CEOP) if the image was requested by an adult, as this is grooming which is illegal.
- Contact the DSL at the relevant school if the image was requested by a school aged child not from this academy, to raise awareness of potential wider safeguarding issues or circulation of the image in their school.

- All actions and information to be logged on CPOMS.
- Parents to be contacted as appropriate.

5.24.11 If a child has been sent a sexually explicit image:

- The DSL or deputy should ask them if they know the person who sent it and their age.
- if the image was sent by another child, staff may want to help the child to speak to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media.
- the DSL will consult the UKIS sharing nudes and semi nudes advice Sharing nudes and semi-nudes: how to respond to an incident (publishing.service.gov.uk).
- if the image was sent by an adult, staff should contact CEOP, the Child Exploitation and Online Protection Centre, as this may be part of the grooming process.
- All actions and information to be logged on CPOMS.
- Parents to be contacted as appropriate.

     Staff must **not**:

- View, copy, print, share, store or save images.
- Ask a child to share or download images (if you have already viewed the images by accident, you must report this to the DSL).
- Delete the images or ask the child to delete it.
- Ask the child/children who are involved in the incident to disclose information regarding the image (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the child it involves or their, or other, parents and/or carers.

5.25   Upskirting

5.25.1   Under the Voyeurism (Offences) Act 2019, upskirting is a criminal offence punishable by up to two years in prison. Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

5.25.2   Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlines within this policy and where appropriate staff will also consult the behaviour policy.

5.26   Homelessness

5.26.1   Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead is aware of routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

5.26.2   Indicators that a family may be at risk of homelessness include:

- household debt,
- rent arrears,
- domestic abuse and anti-social behaviour,
- as well as the family being asked to leave a property.

5.26.3   In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

5.26.4   Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

5.27   Children with Special Educational Needs (SEN) and disabilities

5.27.1   Children with SEN and disabilities can be more susceptible to safeguarding risks as:

- Staff may not be able to spot the signs of abuse in children with SEND or assume that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Children with SEND may be prone to peer group isolation and more vulnerable to bullying, coercion and 'grooming' without outwardly showing any signs
- Children with SEND may experience increased feelings of anxiety which prevent them from 'speaking out'
- Some children with SEND rely on adults for personal care, and this vulnerability puts them at greater risk of being harmed or abused
- Children with SEND are more likely to work alone with a single adult, putting them at greater risk of being harmed or abused
- Children with SEND may not be able to recognise that they are being abused

5.27.2   In addition to these increased risk factors, disabled children may have communication difficulties which make it difficult to tell others what is happening to them. Adults, including professionals assessing their needs and caring for them, may concentrate on the child's special needs and overlook signs and symptoms that they are being maltreated.

5.27.3   All staff must therefore be aware of and extra vigilant to the possible indicators of abuse and/or neglect for disabled children. The designated safeguarding lead should liaise regularly with the special educational needs co-ordinator, the behaviour lead and the

attendance lead, maintaining a culture of vigilance and being alert to any relevant new information or concerns.

5.27.4   If staff have a concern for a disabled child they must consider:

- The child's communication needs and how they can communicate effectively with them
- What information in relation to the child disability and special needs staff need to be aware of in order to assess risk of abuse
- What resources staff require in order to undertake an informed assessment of safeguarding risk
- Where child protection issues are considered regarding a child with disabilities, there must be involvement by key professionals who know the child well, including those who have a comprehensive understanding of the child's disability, method of communication, and any associated medical condition.

5.27.5   Schools should consider what specialist advice, guidance and training may be required in order for staff to understand why children with SEND can be more vulnerable to abuse and how to recognise signs of abuse and/or neglect of disabled children

5.28   Mental Health

5.28.1   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.

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

5.28.3   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. We will ensure that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

5.28.4   We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

5.28.5   We seek to embed positive mental health and mental health awareness through our academy to create a culture where children can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PHSE schemes [Our mental health and wellbeing webpage also has a range of useful resources and signposts to support organisations, with a dedicated page also targeted at parents and carers.

5.28.6   If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the referral mechanisms listed within this policy and speaking to the designated safeguarding lead or a deputy.

5.29 Children who are LGBT

5.29.1 Children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

5.29.2 Staff will endeavour to reduce the additional barriers LGBT children face and provide a safe space for them to speak out or share their concern with members of staff.

5.29.3 The academy will actively encourage LGBT children to share their lived experience and views in order to inform practice.

6. Attendance

6.1 Lack of, or erratic attendance or persistent absence is a safeguarding issue and must act as a warning sign to a range of concerns including neglect, sexual abuse, child sexual or child criminal exploitation. It may also be an indication of child-on-child abuse including bullying and sexual harassment or significant mental ill health concerns. It must not be seen as an isolated concern.

6.2 We have a separate attendance policy (which includes protocols for children missing education and elective home education) in place which references both Working together to improve school attendance Working together to improve school attendance (publishing.service.gov.uk) and Children Missing Education Stat guidance template (publishing.service.gov.uk)

6.3 General information and advice for academies can also be found in the Government's Missing Children and Adults - A cross government strategy (publishing.service.gov.uk)

6.4 We have a named senior leader with strategic responsibility for attendance (James Lowden).

6.5 Academy attendance operational leads, in addition to the general safeguarding training that all staff receive are given access to role specific safeguarding training and ensure they understand the safeguarding implications behind poor or non-attendance.

6.6 Academy leaders and governors ensure that attendance data, particularly for identified vulnerable groups is closely and regularly monitored identifying trends or patterns which may indicate safeguarding concerns.

6.7 Where appropriate, social workers will be involved, informed and updated about attendance issues.

6.8 Children Missing Education (CME)

6.8.1 Children who go missing from education are at significant risk and children who are already known to children's social care, who are on a child in need or child protection plan or in the care of the local authority are additionally vulnerable and in need of additional protection.

6.8.2 We will follow the protocols laid out our attendance policy

6.8.3   The DSL will ensure the academy response to identifying children missing from education supports identifying potential abuse or exploitation and also prevents them going missing in the future.

6.8.4   The academy will ensure compliance with the guidance and regulations contained in the appropriate sections of the Keeping Children Safe in Education (September 2022) document and Children Missing Education Statutory guidance for local authorities (September 2019).

6.9 Elective Home Education (EHE)

6.9.1   We will follow the protocols laid out our attendance policy

6.10 Children with medical conditions who cannot attend school

6.10.1   We will follow the protocols laid out our attendance policy

7. Recruitment of staff and volunteers

7.1   The academy will ensure that safer recruitment practices always follow KCSIE and will be adhered to by staff.

7.2   Every interview panel will have at least one member who has a current certificate in safer recruitment. These certificates will be updated every two years. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process including carrying out an online search as part of due diligence on shortlisted candidates.

7.3   We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.

7.4   We will ensure that any alternative provision facility working with the academy provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.

7.5   Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

7.6   We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.

7.7   The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. The academy will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.

7.8   The types of checks undertaken will be in accordance with the guidance given in the Keeping Children Safe in Education (September 2022) document.

7.9   Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in the Keeping Children Safe in Education (September 2022) document.

7.10   Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.

7.11   The academy will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all shortlisted candidates, including internal ones, before interview (unless the candidate has expressly denied permission for the employer to approach their referees). Where references have been sought, any issues or concerns they raise can be explored further with the referee and taken up with the candidate at interview.

7.12   The academy will keep a single central record in accordance with the regulations given in the Keeping Children Safe in Education (September 2022) document.

7.13   Recruitment and/or deployment checks will be undertaken as stated in the Keeping Children safe in Education (September 2022) document.

7.14   The academy will carry out all relevant checks if there are concerns about an existing member of staff and refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

8. Dealing with allegations against staff and volunteers which meet the harms threshold

8.1.   The academy holds a comprehensive 'Allegations against staff' policy and a staff code of conduct which can be found on the staff shared drive on Google, under policies and guidance] and which outline in detail expected standards of adult behaviour and procedures to take where there are concerns. Where any member of the academy staff or any volunteer has concerns that a person has caused harm or poses a future risk of harm to vulnerable groups, including children they must act in accordance with this academy policy.

8.2.   We will prevent people who pose risks to children from working in our academy by ensuring that all individuals working in any capacity at our academy have been subjected to safeguarding checks in line with the statutory guidance Keeping Children Safe in Education (September 2022).

8.3.   At Ormiston Denes Academy we recognise the possibility that adults working in the academy may harm children. Any concerns about the conduct of other adults in the academy should be taken to the principal without delay (or where that is not possible, to the designated

safeguarding lead); any concerns about the principal should go to the academy education director (Richard Dolding).

8.4. If for any reason you cannot make a referral through these routes you have a duty to refer directly to the Local Authority Designated Officer (LADO) whom you can contact here:

- **[LADO@suffolk.gov.uk]**
- **0300 123 2044**

8.5. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

8.6. Allegations against staff should be reported to the principal. Allegations against the principal or the designated safeguarding lead should be reported to the academy education director who will inform the director of secondary education and the chair of governors as required.

8.7. Where a child makes an allegation against a staff member, supply teacher or volunteer, the allegation will be taken seriously and acted upon immediately and assessed to determine if they meet the harms threshold or can be dealt with under the 'low level concerns' advice in KCSIE 2022. Parents will be contacted as soon as reasonably possible. The child will be offered support and their wishes will be carefully considered before any actions are carried out.

8.8. Under its duty of care for its employees, the academy will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The academy will ensure its obligations for confidentiality when an allegation has been made.

8.9. Concerns or allegations that do not meet the harm threshold/low level concerns

8.9.1 The academy holds a comprehensive 'Allegations against staff' policy and a staff code of conduct which can be found in the staff shared drive on Google under policies and guidance] and which outline, in detail, expected standards of adult behaviour and procedures to take where there are concerns. Where any member of the academy staff or any volunteer has concerns about a member of staff, they must act in accordance with this academy policy

8.9.2 A low-level concern is described in KCSIE as

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

8.9.3   All staff will be made aware that is it crucial that all low-level concerns are shared responsibly with the principal or DSL, recorded and dealt with appropriately.

9. Training for all staff and children

9.1. Every year all staff (including non-teaching and volunteers) must undertake a variety of Child Protection and Safeguarding training including on KCSIE. This training will be informed by national and local context as well as identified gaps in knowledge and understanding

9.2. Training is recorded and logged. All staff are informed clearly as to how to report anything of concern to [a Designated Safeguarding Lead] immediately. See Appendix 1 for a flow diagram of how concerns are dealt with at the academy academy to customise as required. In addition all staff must read KCSIE part 1

9.3. All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the safeguarding and child protection policy, behaviour policy, staff code of conduct, systems and processes for CME and Keeping Children Safe in Education: Statutory Guidance for Academies and Colleges, Part One and Annex A (September 2021), and other related policies.

9.4. The designated safeguarding lead will undergo updated level 3/DSL level child protection training every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.

9.5. All staff members of the academy will undergo safeguarding and child protection training (whole-academy training) which is regularly updated.

9.6. All governors must undergo governor specific online awareness training at least every two years.

9.7. Staff members who miss the whole-academy training should notify the DSL and will be required to undertake other relevant training to make up for it, e.g., by joining another academy's whole-academy training. It is the responsibility of each member of staff to ensure they have completed all mandatory safeguarding training.

9.8. We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-academy training if it takes place during their period of work for the academy.

9.9. The designated safeguarding lead will provide an annual briefing to the academy on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews. This will be supplemented with bulletins, refreshers or updates through the academic year, coupled with any role-specific additional training for certain groups of staff.]

9.10. The DSL will ensure the academy maintains accurate records of staff induction and training.

10. Establishing a safe environment in which children can learn and develop

10.1. Anti-bullying

10.1.1   We hold a comprehensive anti-bullying policy

10.1.2   At this academy we do the following to raise awareness of bullying and what to do about it [Reports of a concern can be made verbally, in writing or email to any staff member, through the anonymous online reporting forms on our webpage, or through the suggestion and worry boxes in the academy.]

10.1.3   If any child / member of staff / parent / carer has a concern about bullying, they should report it to: [their form tutor or year team] or any member of staff.

11. Confidentiality and sharing information

11.1.   Staff should only discuss concerns with the designated safeguarding lead, principal or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

11.2.   All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that anything being released into the public domain does not compromise evidence.

11.3.   Child protection files must be transferred to a new school within 5 days for in year transfers or within the first 5 days of the start of a new term

11.4   Storage and handling of records

11.4.1   Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1998 and the GDPR (2018) and the academy's Data Protection Policy (Stored in the academy Policies Folder).

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

11.4.3   Any paper record of concern forms and other written information will be stored in a locked facility accessed only by the principal and Designated Safeguarding Lead. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive; these items will also be password protected and kept in locked storage.

11.4.4   Child protection information will be stored separately from the child's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy they will be sent separately from the child's file and under a confidential cover or in an encrypted electronic file.

11.4.5   Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to the principal or Designated Safeguarding Lead. The Data Protection Act does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child.

11.4.6   We will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

11.4.7   being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.

11.4.8   understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

11.4.9   for schools, not providing children's personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR.

11.4.10   Further details on information sharing can be found:

- in Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing
- at Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful
- The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR. When in doubt the academy will contact OAT Data Protection Officer.

12. Use of academy premises for non-academy activities

12.1. Where the academy premises are hired or rented out the academy leadership will ensure that appropriate arrangements are in place to keep children safe.

12.2. The academy policies will apply where the services or activities are provided by the academy and are under the direct supervision or management of academy staff.

12.3. Where services or activities are provided separately by another body, the governors and academy leadership will seek written assurance that the body concerned has appropriate child protection and safeguarding policies in place (including inspecting these as needed) and ensure that there are arrangements in place to liaise with the academy on these matters where appropriate.

12.4. This applies whether or not the children who attend any of these services or activities are children on the academy roll.

12.5. The academy leadership and governors should also ensure safeguarding arrangements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

13. Management of the Policy

13.1. The academy will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the Education Act 2002, the Education (Independent Academy Standards) Regulations 2014 and the Education (Non-Maintained Special Academies) (England) Regulations 2011, Currently: *Keeping children safe in education: Statutory guidance for academies and colleges* (September 2021) and the departmental advice: *What to do if you are worried a child is being abused – Advice for practitioners* (September 2016). Nothing written in this policy overrides the academy's duties under such legislation.

13.2. The Governing Body will oversee the policy, ensure its implementation and review its content on an annual basis.

13.3. The principal will report on safeguarding activity and progress within the academy to the governing body termly.

13.4 Feedback on this policy

Staff are encouraged to feedback to Ormiston Academies Trust directly through email at any point in the year policies@ormistonacademies.co.uk and *[through the academy's line management structure, drop-in meetings with the Senior Team/Principal or staff working party groups]*.

Signed by:

Chair of Governors:

Date:

Principal:

Date:

Appendix 1

Raising safeguarding concerns about a child – (this outline cannot cover every eventuality – all cases will keep the best interests of the child at the heart of any decision)

Concern put in writing on CPOMS

(or on paper form if CPOMS temporarily unavailable)

Designated Safeguarding Lead(s):

James Lowden
Michelle Read

Link Governor:

Louise Bernasconi

Designated Safeguarding Lead /safeguarding team reviews CPOMS and discusses next steps with appropriate safeguarding colleagues (a strategy meeting may be necessary)

The local authority Designated Safeguarding Lead (LADO) for concerns about adults is:

Contact details:

LADO@suffolk.gov.uk

Tel: 0300 123 2044

https://www.suffolksp.org.uk/assets/Working-with-Children-Adults/LADO/ssp_lado_leaflet.pdf

Decision made to monitor the concern.

Actions and rationale recorded clearly on CPOMS

Decision made to discuss the concern informally with the parents/child

Actions and rationale recorded clearly on CPOMS

Decision made to refer the concern to social care/other safeguarding partners

Actions and rationale recorded clearly on CPOMS

Class teacher/tutor/other staff member asked to monitor child and feedback to the designated safeguarding lead within an agreed timescale

Actions and rationale recorded clearly on CPOMS

Once discussed with parents and child decision made to

- monitor
- instigate Early Help processes or
- refer to social care

Actions and rationale recorded clearly on CPOMS

Monitor

Refer

Actions and rationale recorded clearly on CPOMS

In exceptional circumstances, concerns may be referred directly to children's social care without parental consent.

Contact Details

Social Care Referrals: 0808 800 4005

Prevent/Channel Referrals:

preventreferrals@suffolk.pnn.police.uk