



**Transform Trust**  
**TRUST CENTRE**

**Child Protection and Safeguarding Overarching Policy**  
**2023-24**

<b>Policy Number</b>	<b>Author</b>	<b>Publication Date</b>	<b>Review Cycle</b>
200	Operational Safeguarding Lead	V4 September 2023	Annual

## Transform Trust – Safeguarding Expectations our schools

### Transform Trust Safeguarding Statement

Transform Trust are committed to safeguarding children. **All** staff are expected to share this commitment. Staff take all welfare concerns seriously and encourage children to speak out about anything that worries them, always acting in the best interests of the child.

### Guardians of the Trust

In 2015, our CEO developed the concept of having a Guardians Group who would be responsible for a strategic overview as well as development and supporting schools with all aspects of a child’s life. For September 2023 our working groups include Safeguarding, SEND, Provision (all and any vulnerable group identified by the Trust), our bespoke Enhanced Provision Panel and our Strategic Group who maintain an overview of all its groups. Our Guardians work continues to evolve but remains focussed on providing support for the whole child.

Guardians Group – Jill Wilkinson, Chair, Chief Operating Officer (COO)					
Provision Group	Safeguarding Group	Enhanced Provision Panel	SENDCo Group	HR (Safeguarding)	Attendance Group
<b>Arvinder Badwal</b> Pear Tree Juniors	<b>Matt Barnham</b> Rosslyn Park	<b>Emma Hampton</b> SEND Associate	<b>Emma Hampton</b> SEND Associate	<b>Rachel Hannon</b> HR Director	<b>Sam Hickey</b> Pear Tree Juniors
Trust Centre Guardians					
<b>Rebecca Meredith</b> <b>Kelly Lee</b>			<b>Claire Smith</b> <b>Mary Farmer</b>		

### Trust Centre Team

Transform Trust have a dedicated team at Trust Centre who have responsibility for all things safeguarding. They are held to account by the Safeguarding Trustee

Trust Board – Dame Susan Jowett, Safeguarding Trustee		
Transform Trust Accountable Officer, CEO - Rebecca Meredith, CBE		
COO – Jill Wilkinson		
Operational Safeguarding Lead	Director of Inclusion	Safeguarding Clerk
Claire Smith	Emma Hampton	Mary Farmer, DSL

For any urgent matters relating to safeguarding, you can contact the Trust via Claire Smith, Trust Operational Safeguarding Lead:

[claire.smith@transformtrust.co.uk](mailto:claire.smith@transformtrust.co.uk)

0115 9825090 (option 1) - This number is available outside of normal working hours.

07929 521578

### Trust Safeguarding Team

The school must have a Senior Designated Safeguarding Lead who is appointed by the Leadership Team and the safeguarding element of their role must form an explicit part of that person’s job description. For Trust Centre this is Claire Smith, Trust Operational Safeguarding Lead.

### Safeguarding Link Trustee

It is a statutory requirement to have a named Safeguarding Trustee. Your Safeguarding Trustee must undertake safeguarding training to a level 2 or equivalent and Safer Recruitment. Training is available through a range of online courses via either SSS Learning or National Online Safety (NOS) or face to face sessions through the

school or the Trust. The Trust support Safeguarding Governors by running termly briefings for them keeping them up to date with all the latest changes to legislation and best practice.

The Safeguarding Governor for Trust Centre is Dame Susan Jowett, [susan.jowett@transformtrust.co.uk](mailto:susan.jowett@transformtrust.co.uk)

### **Chair of Trustees**

The Chair of Trustees is also responsible for having an overview of all matters relating to the school including Safeguarding. They will also be the person who should be contacted if there is an allegation made against the Headteacher. The Chair of Trustees for Trust Centre is Peter Munro, [peter.munro@transformtrust.co.uk](mailto:peter.munro@transformtrust.co.uk)

### **Other Policies, protocols and Guidance documents to support this policy include: -**

- CCTV
- *Community Incident Protocol 2023 (Trust)*
- *Complaints*
- *Confidentiality Reporting (Whistleblowing)*
- *Data Protection*
- *Employee Code of Conduct*
- *Equality*
- *Health & Safety Trust Policy and school's own Health and Safety procedures*
- *Management of allegations (Contained within the Disciplinary Policy)*
- *Offsite Trips Guidance*
- *Online Safety Policy (including filtering and monitoring on school / Trust devices)*
- *Safer Recruitment (including appropriate checks)*
- *Staff Induction (school's own local procedures)*

### **Introduction**

We expect that our staff, governors, and all visitors fully recognise the contribution the Trust and schools make to safeguarding children. We recognise that the safety and protection of all pupils is of paramount importance and that all staff, including volunteers, have a full and active part to play in providing early help protecting pupils from harm. We believe that our Trust and schools should provide a caring, positive, safe and stimulating environment, which promotes all pupils' social, physical, emotional and moral development. In delivering this ambition, we will adhere to the principles set out in the Trust's Safeguarding Policy as well as the Local Authorities guidance and procedures for supporting families in our communities.

Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of everything we do, and by every individual and agency playing their full part; working together to meet the needs of our most vulnerable children; in line with Working Together to Keep Children Safe 2018 and Keeping Children Safe in Education 2023 (KCSIE 2023).

Our Policy and Guidance Document for Schools follows the same structure as the latest KCSIE (September 2023), please note the following.

Where the guidance states "**must**" please consider this to be legal and you will need to do it. Where something is recommended as best practice, we will use the word "**should**".

### **The aims of our Policy are to:**

- Confirm that the pupils' development is supported in ways that will foster security, confidence and independence.
- Raise the awareness of teachers, non-teaching staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse, including Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE) and Honour Based Violence (HBV).
- Sexual Violence and Sexual Harassment (SVSH). Guidance on SVSH is a new section in Keeping Children Safe in Education, 2023. Previously there was separate guidance for professionals to follow, however this has been incorporated into the KCSIE 2023 guidance. Guidance refers to "Perpetrators" and "victims", it is important that we remember that all children involved are likely to be a victim in some way and therefore these terms should not be used with the child.
- Confirm the structured procedures to be followed by all members of each school community in cases of suspected harm or abuse.
- Emphasise the need for good levels of communication between all members of staff and those with designated responsibility for child safeguarding, health and safety and other safeguarding responsibilities.
- Emphasise the importance of maintaining and implementing appropriate safeguarding policies, procedures and arrangements of those service providers who use the school's premises through extended schools or provide any other before and after school activities.
- Confirm the working relationship with the Local Authority agencies such as Children and Families Direct, the LA Safeguarding Board, and other agencies with similar services in neighbouring authorities. Working Together to Safeguard Children (July 2018) outlines how the agencies should work together.
- Highlight the working relationship between the school and the Trust's Safeguarding Team.
- Following the publication of [Meeting digital and technology standards in schools and colleges](#) (updated March 2023) and KCSIE 2023, we ensure that all staff are aware of our filtering and monitoring duty. Senior leaders work closely with governors, the Lead DSL and IT service providers in all aspects of filtering and monitoring.

### **Definition of Safeguarding/Child Protection**

**All** staff must understand that Safeguarding and Child Protection are two different things:

- **Safeguarding is** what we do for all our pupils and staff.
- **Child protection** being the procedures we use for children and young people who have been significantly harmed or are at risk of such harm.

*"We promote a culture of Safeguarding through policy application and curriculum opportunities. We must remember that it could happen here".*

*Guardians Group 2023.*

KCSIE 2023 states that a schools should have a child centred and coordinated approach to safeguarding and this is mirrored by the work that we do as a Trust. Paragraph 4 (KSCIE 2023, pg6) states that for the purpose of the Guidance, Safeguarding and promoting the welfare of children is defined as: -

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

Our Safeguarding Policy must apply to **all** staff, Governors, volunteers, and visitors to the Trust or any of our schools.

## Responsibilities

### *Transform Trust:*

Transform Trustees and the Trust's Safeguarding team are responsible for ensuring the safety and well-being of all children and staff across the Trust. The Trust will provide support in the form of: -

- Regular briefing sessions via the Trust's Safeguarding Working Group for school DSLs and other members of the safeguarding team the school feel appropriate.
- Peer-led mini-case conferences across each Partnerships for DSLs and other safeguarding colleagues to present complex cases and identify best practice and learning points.
- Termly safeguarding briefings for Safeguarding Governors.
- Access to a range of safeguarding training.
- Support for safeguarding colleagues who may need to present and/or attend court on safeguarding matters.
- Provide advice, support, and challenge for school DSLs to talk through concerns and next steps.
- Any Trust Centre staff who are based, or work in schools, will be required to follow the school's own Safeguarding Policies.
- The Trust has a clear process in place for managing serious safeguarding concerns or incidents (Appendix 1). This includes supporting with the Local Authority processes (Rapid Review/Local Child Safeguarding Practice Review (LCSPR) as well as Trust processes that mirror the external review processes.

The Trust mandates that all schools use the online safeguarding recording system MyConcern. The Trust's Safeguarding team will also conduct regular audits of the MyConcern system for each school to look for learning points and best practice.

We will also run our own 'Internal Case Reviews' and conduct 'No Notice' visits when there has been a serious child (or staff) injury to ensure that our processes are robust.

As part of the Trust's commitment to safeguarding, we highly recommend that all safeguarding colleagues in schools access Supervision. The Trust have a team of three trained Supervisors, led by the Trust's Operational Safeguarding Lead. Working Together to Safeguard Children (2018) states "Practitioners should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively" (Pg 58), and whilst KCSIE 2023 does not mandate supervision, we as a Trust feel that this is a key factor in effective case management as well as supporting our colleagues in schools.

### *Transform Trustees*

We have a named Safeguarding Trustee who meets termly with the CEO, COO and the Trust's Operational Safeguarding Lead. The Safeguarding Trustee fulfils the same role as that of the Safeguarding Governor in schools. In addition, the COO presents a half-termly update on key strategic safeguarding developments to the full Trust Board.

All Trustees will receive appropriate safeguarding training, including information about online safety (KCSIE S81).

The named Trustee will liaise with appropriate agencies in the event of any allegations made against the CEO or another Trustee.



### ***The Trustees will:***

- Ensure one of their members is nominated to liaise with the Trust, the Local Authority and/or partner agencies on issues of child protection in relation to safeguarding and in the event of allegations of abuse made against the Executive Team, a Member, a Trustee or Governor.
- Ensure that all staff and volunteers are aware of the indicators of abuse and neglect as outlined in KCSIE, 2023 –S26-S30. This includes abuse, physical abuse, emotional abuse, sexual abuse and neglect.
- Ensure there is no period where there is no appointed safeguarding trustee e.g., after a member resigns and before another is appointed. If necessary, Trust Board will provide a transition period where there will be two appointed trustees.
- Ensure that Trust Centre has a Child Protection/Safeguarding policy; Staff Conduct policy and appropriate procedures in place; operates safer recruitment; undertakes appropriate checks on staff and volunteers and has procedures for dealing with allegations against staff and volunteers that all comply with the Local Authorities Safeguarding Board - Local Authority Designated Officer (LADO).
- Ensure that Trust Centre creates a culture of safer recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might pose a risk to children (Part three: Safer Recruitment, Keeping Children Safe in Education 2023).
- Ensure staff, trustees and volunteers are aware of the four types of indicators of abuse/neglect.
- Ensure that the school has appointed a member of staff of the school’s leadership team to the role of Senior DSL.
- Ensure Trust Centre HR team keep an up-to-date Single Central Record of pre-employment checks, specifying when the check was made and when it will be renewed.
- Monitor the adequacy of resources committed to child safeguarding, and the staff and Governor training profile.
- Recognise that neither it, nor individual trustees, have a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against staff).
- Ensure that relevant staff have “due regard to the relevant data protection principles”, which allow them to share (and withhold) personal information (KCSIE 2023 paragraphs 118-119).
- Ensure that the Trust and all schools have appropriate filtering and monitoring standards and appropriate cyber security protocols are in place to keep children, adults and our data safe.
- All trustees will receive appropriate safeguarding training, including information about online safety (KCSIE S81).

### ***The CEO for the Trust Centre and Headteachers for schools will ensure that:***

- The policies and procedures adopted by the Trustees and Local Governing Bodies are followed by all staff.
- The policy is reviewed and updated whenever it is required, at a minimum this will happen annually.
- The policy is available publicly on the Trust website.
- Designated staff review the policy in consultation with the Trust and any guidance from the Local Authority.
- Sufficient resources and time are allocated to enable the designated persons and other staff to discharge their responsibilities including taking part in strategy discussions and other multi-agency meetings, to contribute to the assessment and support of children and young people and be appropriately trained.
- A Single Central Record all staff and volunteers, and their safeguarding training dates is maintained and that this list confirms that all staff and those volunteers who meet the specified criteria have had a DBS check, when this check was made and when it will be renewed.
- All staff and volunteers feel able to raise their concerns about poor and unsafe practice in regard of pupils, and such concerns are addressed in a timely manner in accordance with agreed policies.

- School staff are sensitive to signs that may indicate possible safeguarding concerns. This could include, for example, poor or irregular attendance, persistent lateness, children missing from education, forced marriage or female genital mutilation.
- All staff, governors and volunteers should undertake appropriate (to role) child safeguarding training, which is updated regularly, in line with Transform Trust guidance.
- Will be responsible for overseeing that all staff and visitors to the school site are wearing the appropriate ID badge at all times.
- All staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. The training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners.

***The trained Designated Leads (Headteacher/senior managers) for safeguarding are:***

- |   |   |
|---|---|
| 1. Senior DSL for the Trust                             | Claire Smith, Trust Operational Safeguarding Lead   |
| 2. Deputy DSL for the Trust                             | Mary Farmer   |
| 3. List all staff with responsibility for Safeguarding: | Rebecca Meredith, CEO<br>Jill Wilkinson, COO<br>Emma Hampton, Director of Inclusion<br><br>Rachel Hannon, HR Director – Safer Recruitment |

***Designated Safeguarding Leads will:***

- Have their roles explicitly defined in their job descriptions.
- Be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively.
- Undergo updated child safeguarding training every year, normally during the admin day in at the start of autumn term.
- Liaise with relevant agencies in accordance with the Local Authority procedures when referring a pupil where there are concerns about possible abuse or harm.
- Be able to access the contents of the Local Authority procedures and Personnel procedures (as identified by Transform Trust) and make these accessible to all staff.
- Support staff who attend strategy meetings, looked after reviews and/or case conferences.
- Support staff and volunteers who may find safeguarding issues upsetting or stressful by enabling them to talk through their anxieties and to seek further support from the school leadership group or others as appropriate.
- Ensure involvement of other designated leads e.g., where there are concerns about a pupil who is 'looked after'.
- Support staff to reflect on the information they hold about children and provide an alternative perspective on issues in order to promote a better understanding of what may or may not be concerning.
- Ensure all staff **must** be trained on how to make a referral.
- Ensure that MyConcern is used effectively for all safeguarding matters. Where staff don't have access to MyConcern they should have immediate access to paper copies of the forms.
- Records of concerns are kept on MyConcern, and that all concerns are reviewed in a timely manner. DSLs should add a file note to each concern outlining any decisions, including rational, next steps and follow up work.
- Phone calls about absences are similarly logged on the relevant MyConcern record the children missing education- statutory guidance for local authorities is adhered to;



- Records are reviewed for patterns of what, when taken in isolation would appear to be low level concerns, but when viewed together indicate a pattern which requires further action.
- Where there are existing concerns about a pupil, and they transfer to another school, a copy of information held is transferred securely and confidentially. Where there are safeguarding records, there should also be a discussion with the receiving schools safeguarding team and this should be recorded on MyConcern as an audit trail.
- Concerns are categorised in line with the Trusts MyConcern categories groupings.
- Take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

### **All Staff**

All staff, teaching and non-teaching, volunteers and others working in our schools need to:

- Read, and sign to say that they have read Part 1 and Annex A of Keeping Children Safe in Education (2023) (staff and volunteers) [Transform are asking all staff, regardless of role, to read Part 1 and Annex A].
- Be aware that to safeguard children, they have a duty to share information with the DSLs, and through the Lead DSL, with other agencies.
- Be aware that despite the requirement to share information with the safeguarding team they can make their own referral to children's Social Care, e.g., in urgent situations. All staff must be trained to make a referral.
- All staff to have a clear understanding that disclosures may cover abuse, neglect and exploitation. They should receive guidance on how to reassure victims that are being taken seriously and that they will be supported. KCSIE 2023, explains that *"a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or harassment. Nor should a victim every be made to feel ashamed for making a report"* (Paragraph 18)
- Be alert to signs and symptoms of harm and abuse. Further information regarding potential indicators of abuse, including specific information about risks such as Online safety, Female Genital Mutilation and Forced Marriage.
- Know how to respond to their duty when they have concerns or when a pupil discloses to them and to act.
- Know how to record concerns and what additional information may be required.
- Undergo child safeguarding training which is updated regularly in line with advice from the Trust, Local Authority and other advisors. Guidance is available in both Keeping Children Safe in Education, 2023 and Working Together to Safeguarding Children, July 2018.
- Recognise that abuse and neglect can happen in any setting and maintain an attitude *'it could happen here'*.
- Familiarise themselves with "[What to do if you're worried that a child is being abused: advice for practitioner's guidance](#)" (2015).

Where there are concerns about a member of school staff's suitability to work with children, concerns should be referred straight to the Headteacher and not discussed with other colleagues, if the concern is about the Headteacher then the staff member should contact the Rachel Hannon (HR Director, [Rachel.hannon@transformtrust.co.uk](mailto:Rachel.hannon@transformtrust.co.uk)). If the concern is regarding a member of Trust Centre Staff than Rachel Hannon should be contacted immediately, details should not be discussed with any other colleagues, including the persons line manager. If there are concerns about the way that safeguarding is carried out in any school, staff should refer to the [Trust's Confidential Reporting policy](#) (Whistleblowing). A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A legal obligation has been breached.
- There has been a miscarriage of justice.





- The health or safety of any individual has been endangered.
- The environment has been damaged.
- Information about any of the above has been concealed.

The NSPCC runs a [whistleblowing helpline](#) on behalf of the Home Office, the number is 0800 0280285, (08:00-20:00 Monday to Friday) or you can email them ([help@nspcc.org.uk](mailto:help@nspcc.org.uk)) if you believe a child is in immediate danger call 999.

### Managing allegations of abuse made against teachers (including supply teachers) other staff, volunteers and contractors

**All** members of staff as well as volunteers in any of our schools should report any concerns that they have about the conduct of another adult in a school. If they have concerns, they should **not** speak to the adult concerned, but go straight to either the Headteacher or Senior DSL immediately. Where an allegation is made against the Headteacher or equivalent, where there are concerns about a member of school staff's suitability to work with children, concerns should be referred straight to the Headteacher and not discussed with other colleagues, if the concern is about the Headteacher then the staff member should contact Rachel Hannon, (HR Director), [Rachel.hannon@transformtrust.co.uk](mailto:Rachel.hannon@transformtrust.co.uk)

If the concern is regarding a member of Trust Centre Staff, Rachel Hannon, should be contacted in the first instance and as soon as possible following the concern arising. Details should not be discussed with any other colleagues, including the persons line manager.

**All** allegations about any other adults working in the school should also be reported to Rachel Hannon, HR Director, immediately.

### Reporting Concerns to the Designated Safeguarding Leads

Any concern should be discussed in the first instance with *one of the DSLs or in their absence the Headteacher*, as soon as possible. **If at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care or the police immediately.** Under *Keeping Children Safe in Education* guidance, it is made clear that all staff should know how to make a referral. The National Police Chief Council (NPCC) have produced [guidance](#) of when to call the police, it also gives guidance of what you can expect to happen when you do make a report.

All concerns must be reported in at the earliest opportunity. Staff should alert the DSL if information regarding a child is recorded on another system in school so that it can be logged on MyConcern (e.g., persistent absence information held on Scholarpack). This helps the safeguarding team build a chronology of the lived life of the child/ siblings/ wider family and can be used to help inform referrals to professional services.

### Immediate response to the pupil

It is vital that our actions do not harm the pupil further or prejudice further enquiries, for example:

- Listen to the pupil, if you are shocked by what is being said, try not to show it.
- It is OK to observe bruises but not to ask a pupil to remove their clothing to observe them.
- If a disclosure is made:
  - accept what the pupil says.
  - stay calm, the pace should be dictated by the pupil without them being pressed for detail by asking leading questions such as "what did s/he do next?" It is your role to listen - not to investigate.



- use open questions such as “is there anything else you want to tell me?”
- be careful not to burden the pupil with guilt by asking questions like “why didn’t you tell me before?”.
- acknowledge how hard it was for the pupil to tell you.
- do not criticise the perpetrator, the pupil might have a relationship with them.

**do not promise confidentiality, reassure the pupil that they have done the right thing, explain whom you will have to tell (the designated lead) and why; and, depending on the pupil’s age, what the next stage will be. It is important that you avoid making promises that you cannot keep such as “I’ll stay with you all the time” or “it will be all right now”.**

- all staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child.

### **Recording information**

- All concerns should be reported using MyConcern.
- All staff members have a secure password to access to MyConcern from any web enabled device that is linked using a school email address. Personal email addresses are not to be used, and the Trust DSL will audit this.
- If the concern is urgent, then this should be recorded promptly and flagged as urgent on MyConcern.
- All concerns should be followed up with a conversation with a DSL, urgent concerns should be followed up with a conversation immediately.
- All concerns should be logged before you leave the premises on that day.
- All concerns should be categorised consistently with the agreed transform categories.
- For those staff members who do not have access to MyConcern a paper version of the form will be available at all times and must be completed and returned to the DSL as per the school policy (as above).

### **All concerns should:**

- Note the date, time, place and context of disclosure or concern, facts and not assumption, opinion or interpretation.
- If it is observation of bruising or an injury try to record detail, e.g., “right arm above elbow” **must** be recorded on the Body Map function on MyConcern (paper body maps may be used and uploaded to the file). **Do not take photographs under any circumstances.**
- Note the non-verbal behaviour and the key words in the language used by the pupil (try not to translate into ‘proper terms’).

### **Supporting pupils**

- The staff, Trust safeguarding team and trustees recognise that a child or young person who is abused or witnesses’ violence may find it difficult to develop and maintain a sense of self-worth. We recognise that in these circumstances pupils might feel helpless and humiliated, and that they might feel self-blame.
- We recognise that this school might provide the only stability in the lives of pupils who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a pupil in these circumstances might range from that which is perceived to be normal to aggressive or withdrawn. We regularly update training and briefings to ensure all staff are as equipped to spot potential signs of abuse or neglect as possible.
- The school will support all pupils by discussing child protection cases with due regard to safeguarding the pupil and his or her family; supporting individuals who are, or are thought to be, in need or at risk in line with NCSCB

procedures; encouraging self-esteem and self-assertiveness; challenging and not condoning aggression, bullying or discriminatory behaviour; promoting a caring, safe and positive environment.

- We recognise that the provision of the right help at the right time is a key element of our wider safeguarding responsibilities.

### **Confidentiality**

- The personal information about all pupils' families is regarded by those who work in this school as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will adhere to the GDPR policy and guidance.
- KCSIE 2023, makes it clear that the Data Protection Act 2018 and GDPR do **not** prevent the sharing of information for the purposes of keeping children safe (KCSIE paragraph 94).
- Staff understand that they need know only enough to prepare them to act with sensitivity to a pupil and to refer concerns appropriately. The DSL and Headteacher will disclose information about a pupil to other members of staff on a need-to-know basis only. It is inappropriate to provide all staff with detailed information about the pupil, incidents, the family, and the consequent actions.

### **Staff must be aware that:**

- They cannot promise a pupil complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the pupil or other pupils safe.
- Where there are concerns about a pupil's welfare relevant agencies need to be involved at an early stage. If a member of staff or a volunteer has concerns about a pupil's welfare, or if a pupil discloses that s/he is suffering abuse or reveals information that gives grounds for concern, the member of staff must speak to their Designated Lead with a view to passing on the information. All staff should ensure that they are familiar with the list in paragraph 20 which outlines who may need early help.

### **Working with Parents/Carers**

Trust Centre staff are unlikely to have to work with parents directly, however if they are undertaking a role that means they are part of the school leadership team in a particular school they should use the guidance below (in line with the school policy).

- Parents and Carers play an important role in protecting their children from harm.
- In most cases, the school will discuss concerns about a pupil with the family and, where appropriate, seek their agreement to making referrals to Children and Families Services within their Local Authority setting.
- Where there are any doubts, the DSL should clarify with Children and Families Direct on whether, and if so when and by whom, the parents should be told about the referral. Alternatively, they could ring the Consultation Line in Children's Duty team to discuss this case.
- The pupil's views will be considered in deciding whether to inform the family, particularly where the pupil is sufficiently mature to make informed judgments about the issues, and about consenting to that.
- The school aims to help parents understand that the school, like all others, has a duty to safeguard and promote the welfare of all pupils. The school may need to share information and work in partnership with other agencies when there are concerns about a pupil's welfare.

### **The Child's wishes**



*“Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child’s wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the **best** interests of the child at their heart” (KCSIE, 2023 S95).*

### **Looked After Children**

Supporting children in care is a key priority for our school. We recognise that the needs of this group of children can only be effectively met when all agencies work together. To ensure we have a coordinated approach to meeting the needs of children in care who attend our school we have a designated lead.

### **Prevention in the Curriculum**

- The school recognises the importance of developing pupils’ awareness of behaviour that is unacceptable towards them and others, and how they can help keep themselves and others safe.
- The PSHE programme *in each key stage* provides personal development opportunities for pupils to learn about keeping safe and who to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils are taught to, for example:
  - safely explore their own and others’ attitudes
  - recognise and manage risks in different situations and how to behave responsibly
  - judge what kind of physical contact is acceptable and unacceptable
  - recognise when pressure from others (including people they know) threatens their:
    - personal safety and well-being and develop effective ways of resisting pressure.
    - including knowing when and where to get help
  - use assertiveness techniques to resist unhelpful pressure.
  - How to keep safe online
  - The risks associated with sharing indecent images of, or information about, themselves. This is something that is often referred to as Sexting. Research indicates that this is increasingly associated with concerns such as sexual exploitation. Our work in this area is based on the guidance set out in Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People.
- School staff should be aware of the school’s position statement on Sexting (also referred to as Youth Produced Imagery). This includes sharing of nudes or semi-nudes.

### **Online safety**

Online safety is covered across the curriculum in our schools and they be able to provide more information about how we educate our children to be safe online and when different themes are taught.

In response to a number of extremely worrying hoaxes and online challenges there has been additional guidance published which can be found [here](#).

Every opportunity should be taken to promote online safety with our children. The online world means that we all have access to material and people that we may not come across in everyday life. KCSIE 2023 S135-137 includes details for online safety and outlines the 4 main risks: -

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, succedent-Semitism, radicalisation and extremism.

- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

### Filtering and Monitoring

*We recognise that online learning is an essential part of everyday life and we will ensure that we provide a safe environment in which to learn, doing all we can to limit children's exposure to inappropriate online material.*

*We will work with our IT provider to ensure that our filtering and monitoring system is in place; that any harmful or inappropriate content is blocked without unreasonably impacting teaching and learning; and that our Trust register is regularly monitored by our Lead DSL and COO. Our Safeguarding Trustee will also monitor and review this as part of their safeguarding role.*

*All staff will have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified".*

### Information Security and Access Management

Cyber security is an essential part of keeping our children and data safe. We will ensure that we have a high level of security protection procedures in place in order to safeguard our systems; our staff; our children and other adults who use our networks.

Cyber security is also identified as part of our risk management procedure and is regularly reviewed by the school and Trustees.

### Mental Health

Schools have an important role to play in supporting the mental health and wellbeing of our pupils. In some cases, mental health concerns can be an indicator that the child has or is at risk of suffering some form of abuse, neglect or exploitation. Schools should be familiar with the guidance document Mental Health and Behaviour in schools.

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, school staff 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. Staff need to be aware of how past experiences can impact on mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSLs.

### Definitions, Signs and Symptoms of the four kinds of Abuse and Neglect

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. (see Appendix 2 for signs and symptoms of abuse)

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Emotional abuse** may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

(See Appendix 3 for signs and symptoms of emotional abuse).

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

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

(See Appendix 4 for signs and symptoms of sexual abuse).

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. It can be difficult to know when to take action to protect a child from neglect, ensure that staff know who they can approach to voice their concerns and discuss next steps.

One-off signs may not mean that a child is being neglected. Knowing when a child or family need help requires someone to recognise that there are ongoing or persistent patterns of neglect.

### **Child on Child abuse**

Child on child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the two. Children with SEND are three times more likely to be abused than their peers. Transform Trust recognises that children sometimes display abusive behaviour themselves and that such incidents or allegations must be referred for appropriate support and intervention. Such abuse will not be tolerated or passed off as “banter” or “part of growing up”.

Our Trust has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

- 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 harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sexting (also known as youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they should follow the standard reporting procedures, speaking to a DSL and adding to MyConcern.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

### **Particularly Vulnerable Groups**

Some children and young people may be particularly vulnerable to abuse and harm, which is documented in Section 35 of the Safeguarding Vulnerable Groups Act 2006. This includes for example privately fostered children, children with a disability, children with communication needs. Certain forms of behaviour can also increase the vulnerability of a young person such as drug or alcohol misuse. The DSLs should be aware of the range of guidance that is

available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (NCSCB) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

#### **Child Sexual Exploitation**

The sexual exploitation of children and young people (CSE) under 18 is defined as that which:

*‘involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive ‘something’ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.’*

Child sexual exploitation can occur through the use of technology without the child’s immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economic and/or emotional vulnerability’ (Department for Education, 2012).

Child sexual exploitation is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity. Schools are well placed to prevent, identify and respond to children at risk of sexual exploitation.

#### **Who is at risk?**

Child sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that **they** are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a child safeguarding issue. of KCSIE 2023, 40-42 which gives further guidance.

#### **Child Criminal Exploitation**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity for:

- a) in exchange for something the victim needs or wants, and/ or
- b) for the financial or other advantage of the perpetrator or facilitator and/or



- c) through violence or the threat of violence.

Data shows children as young as 8 can become victims of CCE, however staff should be vigilant for all children and families regardless of age.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals. They may still have been criminally exploited even if the activity appears to be something they have agreed to or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however, professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that boys and girls being criminally exploited may be at higher risk of sexual exploitation. KCSIE S37-S39.

### County Lines

KCSIE 2023 (p143-144) documents how children can be at risk of exploitation in a geographically widespread form of abuse relating to drug and gang cultures. Children are moved around the area and in some cases across the country to carry drugs, money and other illegal activities. Further information is available in the document produced by the Home Office - [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#).

### Preventing Radicalisation

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counterterrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all schools to respond when they become concerned that a child is being, or is at risk of, becoming radicalised. Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk and that staff are appropriately trained to look out for signs of radicalisation. Also, schools will be monitored to ensure they are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology.

Statutory guidance has been published and is available here:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

If you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact at your regional police Prevent Team who will then contact you to discuss whether a referral should be made. Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

Staff will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board and local police force.

Staff will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

Staff should **always** take action if they are worried. All staff are responsible as individuals to report any concerns.

### **Honour-Based Violence (HBV)**

So-called 'honour-based' violence (HBV) encompasses 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. All forms of so-called HBV are abuse and illegal in the UK (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency. The school should also notify the Trust Operational Safeguarding Lead.

## Female Genital Mutilation

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.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

### Risk factors for FGM include:

- Low level of integration into UK society.
- Mother or a sister who has undergone FGM.
- Girls who are withdrawn from PSHE.
- Visiting female elder from the country of origin.
- Being taken on a long holiday to the country of origin.
- Talk about a 'special' procedure to become a woman.

### Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Potential indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers**. If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. (**KCSIE 2023 p154-155**). The school should also notify the Trust Operational Safeguarding Lead.

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students,

but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. [FGM Fact Sheet](#). Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve local authority children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty:

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

(See Appendix 6 which identifies countries that practice FGM).

### Forced Marriage

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

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](#) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk).

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

### Domestic Abuse

KCSIE 2023 S43 has been updated with information around domestic abuse and the impact that can have on how children form relationships: -

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

### **Children Missing from Education (cmie)**

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures.

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

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

### **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

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 be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools 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 school. However, it should be clear to the school who has parental responsibility.

School staff should notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority.

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

### **Sexual Violence/Sexual Harassment (SVSH)**

Part 5 of **KCSIE 2023 (p105-p135)** documents how schools should manage reports of sexual violence and sexual harassment. The schools safeguarding policy should document how staff should manage allegations and how they should put measures in place to safeguard the alleged victim and alleged perpetrator.

All staff must be trained to deal with these allegations and how to make a referral to the relevant authorities such as the police. There is additional guidance available for allegations about online abuse at the UKCCIS sexting advice document.

KCSIE is very clear that any allegation regarding sexual violence and / or sexual harassment is not acceptable and will not be tolerated. Allegations should not be passed off by any party as “Banter” “Part of growing up” or “having a laugh”.

### **Sexual harassment**

Staff should be aware that safeguarding issues can manifest themselves via sexual harassment/sexual abuse. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of sexual harassment/sexual abuse. Even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. Any concerns regarding sexual harassment/sexual abuse should be reported to the DSLs as a matter of urgency.

Sexual harassment might include, but not limited to: -

- Sexual comments, such as telling sexual stories, making inappropriate comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual jokes or taunting.
- Physical behaviour, such as, deliberately brushing against someone, interfering with someone’s clothes. Sexual violence to another pupil.
- Displaying pictures, photos or drawings of a sexual nature
- Upskirting (this is a criminal offence)
- Online harassment. This may be standalone or part of a wider pattern of sexualised harassment and/or sexualised violence.
- Sharing of consensual and non-consensual nude and semi-nude images, including photos of the child taken by themselves.
- Coercing children to share images of themselves or others.

Different gender issues can be prevalent when dealing with sexual harassment/sexual abuse. All staff should be clear in their role and the important part they have in preventing it by responding where they believe a child may be at risk from sexual harassment/sexual abuse.

At Transform Trust we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other pupils.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy (which includes cyberbullying, prejudice-based and discriminatory bullying).

At Transform Trust schools we work with agencies such as the police and social care to support anyone affected by sexual harassment/sexual abuse.

### **Sexting**

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

### **Upskirting**

The Voyeurism (Offences) Act, often referred to as Upskirting Act was introduced on 19<sup>th</sup> April 2019. Upskirting is defined by KCSIE, 2023 is "typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm." Upskirting is illegal, and the perpetrator can face up to 2 years in prison. **The victim can be any gender.** KCSIE 2023 has been updated to clarify that although referred to as "Upskirting" the victim can be any gender.

### **Mobile Devices**

Appropriate use of mobile devices is essential. The use of mobile devices must not detract from the quality of supervision and care of children. Practitioners are able to use their personal mobile phones during their break times. During working hours, they must be kept out of the reach of children and parents, in a secure area accessible only to staff. All staff are made aware of their duty to follow this procedure which is set out in the Code of Conduct.

Visitors to schools are requested not to use their mobile phones (or other personal devices) on the premises. If it is needed a member of school staff will show them where it can be used away from children.

We believe that photographs validate children's experiences and achievements and are a valuable way of recording milestones in a child's life. Parental permission for the different ways in which we use photographs is gained as part of the initial registration. We take a mixture of photos that reflect the pre-school environment; sometimes this will be when children are engrossed in an activity either on their own or with their peers. Children are encouraged to use the camera to take photos of their peers. In order to safeguard children and adults, and to maintain privacy, cameras are not to be taken into the toilets by adults or children. All adults whether teachers/practitioners or volunteers at Transform Trust understand the difference between appropriate and inappropriate sharing of images. All images are kept securely in compliance with the Data Protection Act.

### **Children who Self-harm**

Staff should always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary age child has self-harmed

serious consideration must be given to whether there are other underlying factors, including abuse. All such cases should be discussed with children's social care.

Even in those unusual cases where a primary age child is thought to have self-harmed it is important to recognise that this behaviour is an indicator of emotional distress, and the child will need support to address this.

### **The Children's Code**

The Children's Code came into effect on 2 September 2021. This is a data protection code of practice for online services such as apps, online games, web and social media sites likely to be accessed by children. Schools and DSLs need to ensure that any online services commissioned are compliant with the 15 standards in which to protect children's data online. More information and teaching resources are available: <https://ico.org.uk/for-organisations/childrens-code-hub/>

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

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- children with SEND and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers.

### **Training**

Regular training and discussion within the school environment is important and should be led by the Lead DSL. The Trust additionally provides opportunities for DSLs to network and share best practice with their peers across the Trust through mini-case conferences.

Staff training will include reference to filtering and monitoring so that staff understand and have an awareness of this.

### ***Timelines for training***

All safeguarding training should be refreshed within the required timeline issued by the Trust.

All staff, schools and Governing bodies should be open to new learning and keep up to date with changes made to national and local safeguarding policy, procedure and guidance including that provided by our safeguarding partners.

Schools need to evaluate and demonstrate how well they fulfil their statutory responsibilities and exercise professional judgment in Keeping Children Safe as outlined in KCSIE 2023.

Safeguarding training records should be made available for viewing by the Trust Safeguarding Team and the Safeguarding Governor upon request.



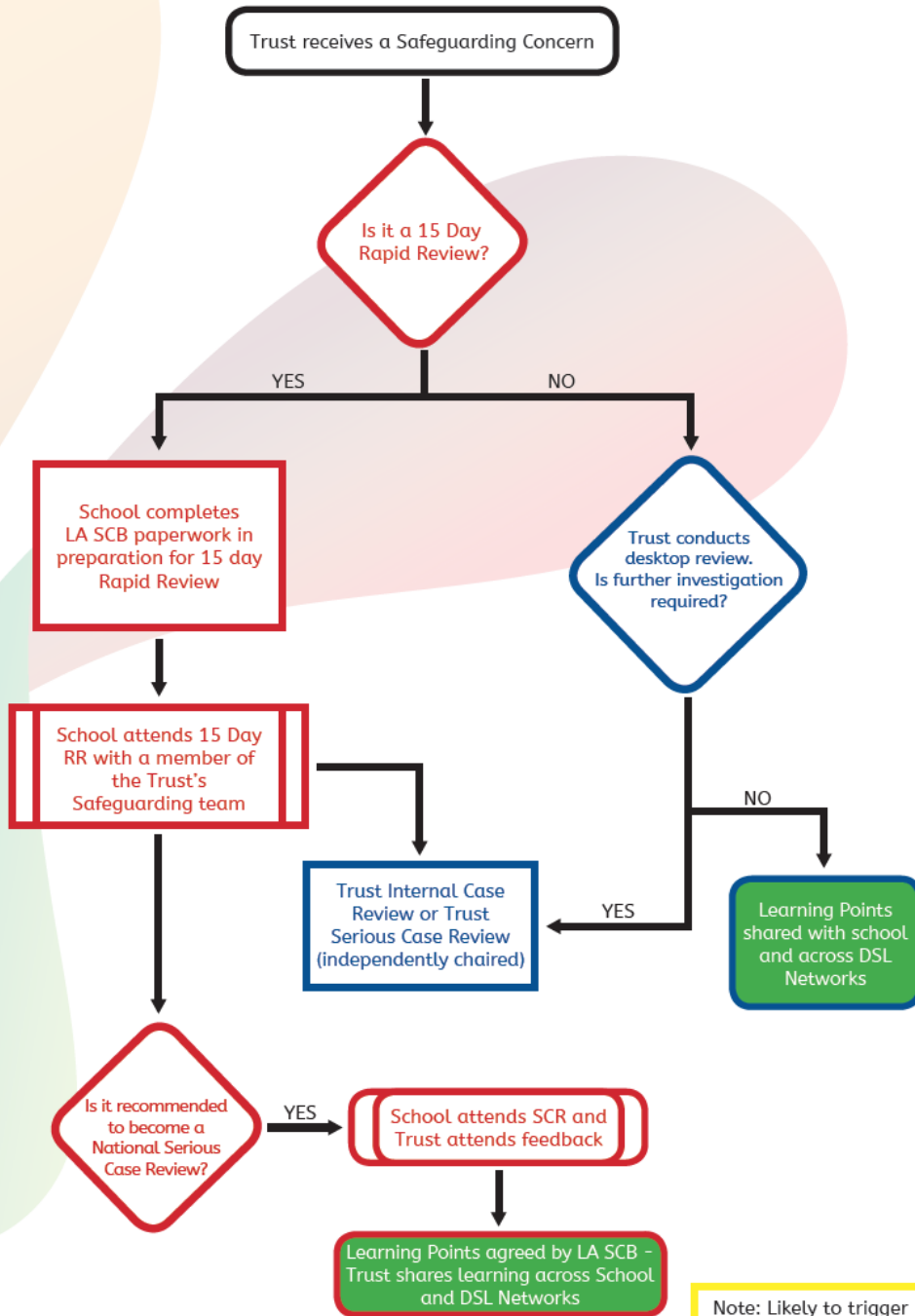
## Schools and Partnerships

Schools invest time and other resources in partnership activity and this investment should be aimed at improving outcomes for pupils. The Local Authority actively promotes the benefits to schools of partnerships and in this case to safeguard and improve the outcomes for potentially vulnerable pupils. Examples of this are:

- **Parental E-learning (free): Child Sexual Exploitation** is a high profile issue. Schools are asked to promote this e-learning with their parents and carers as it is an opportunity to improve their awareness in identifying and responding to child sexual exploitation from a preventative or early intervention perspective. <http://www.paceuk.info/the-problem/keep-them-safe/>. These tools can also be used by Primary school staff and adapted as appropriate.

Appendix 1:

Transform's Flow Chart for managing serious Safeguarding Concerns



Note: Likely to trigger a Sec 8 Ofsted

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 Claire Smith, Trust DSL: [claire.smith@transformtrust.co.uk](mailto:claire.smith@transformtrust.co.uk)  
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## Appendix 2: Signs and Symptoms of Physical Abuse

### Physical symptoms:

#### Bruises

- commonly on the head but also on the ear or neck or soft areas - the abdomen, back and buttocks
- defensive wounds commonly on the forearm, upper arm, back of the leg, hands or feet
- clusters of bruises on the upper arm, outside of the thigh or on the body
- bruises with dots of blood under the skin
- a bruised scalp and swollen eyes from hair being pulled violently
- bruises in the shape of a hand or object.

#### Burns or scalds

- can be from hot liquids, hot objects, flames, chemicals or electricity
- on the hands, back, shoulders or buttocks; scalds may be on lower limbs, both arms and/or both legs
- a clear edge to the burn or scald
- sometimes in the shape of an implement for example, a circular cigarette burn
- multiple burns or scalds.

#### Bite marks

- usually oval or circular in shape
- visible wounds, indentations or bruising from individual teeth.

#### Fractures or broken bones

- fractures to the ribs or the leg bones in babies
- multiple fractures or breaks at different stages of healing

#### Other injuries and health problems

- scarring
- effects of poisoning such as vomiting, drowsiness or seizures
- respiratory problems from drowning, suffocation or poisoning

#### Things you may notice

Withdrawn, suddenly behaves differently, anxious, clingy, depressed, aggressive, problems sleeping, eating disorders, wets the bed, soils clothes, takes risks, misses school, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts about suicide.

### Appendix 3: Signs and Symptoms of Emotional Abuse

There often aren't any obvious physical symptoms of emotional abuse or neglect but you may spot signs in a child's actions or emotions.

Changes in emotions are a normal part of growing up, so it can be really difficult to tell if a child is being emotionally abused.

Babies and pre-school children who are being emotionally abused or neglected may:

- be overly affectionate towards strangers or people they haven't known for very long
- lack confidence or become wary or anxious
- not appear to have a close relationship with their parent, e.g., when being taken to or collected from nursery etc.
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you wouldn't expect them to know for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends.

Things you may notice

Withdrawn, suddenly behaves differently, anxious, clingy, depressed, aggressive, problems sleeping, eating disorders, wets the bed, soils clothes, takes risks, misses school, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts about suicide

## Appendix 4: Signs and Symptoms of Sexual Abuse

Children who are sexually abused may:

### Stay away from certain people

- they might avoid being alone with people, such as family members or friends
- they could seem frightened of a person or reluctant to socialise with them.

### Show sexual behaviour that's inappropriate for their age

- a child might become sexually active at a young age
- they might be promiscuous
- they could use sexual language or know information that you wouldn't expect them to.

### Have physical symptoms

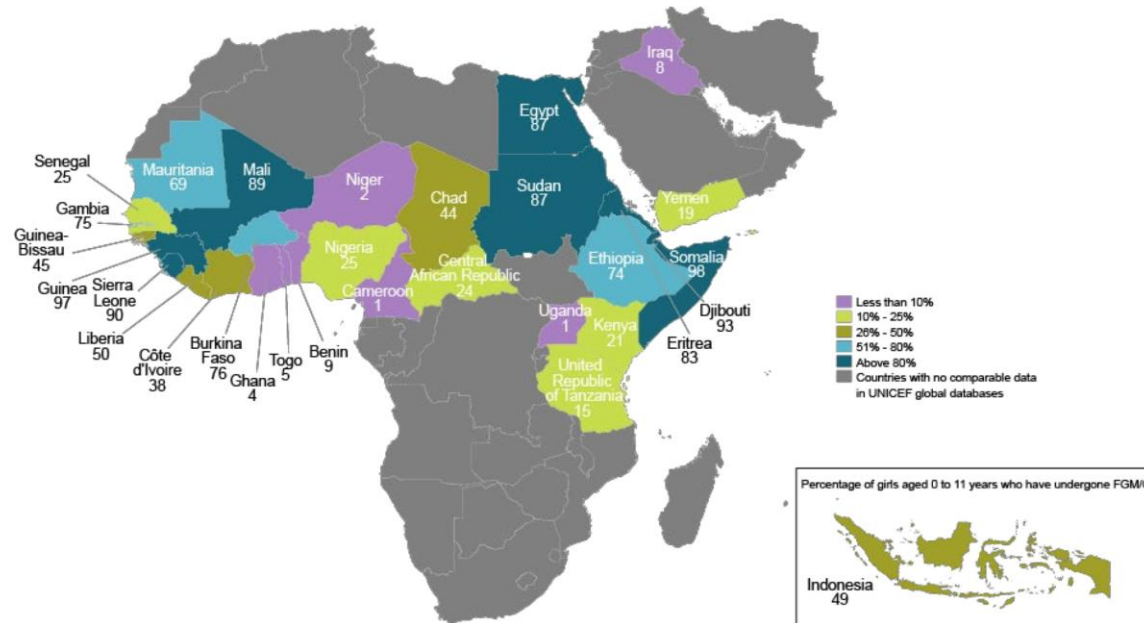
- anal or vaginal soreness
- an unusual discharge
- sexually transmitted infection (STI)
- pregnancy.

### Things you may notice

Withdrawn, suddenly behaves differently, anxious, clingy, depressed, aggressive, problems sleeping, eating disorders, wets the bed, soils clothes, takes risks, misses school, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts about suicide.

## Appendix 5: Countries that practice FGM

Figure 1: Percentage of girls and women aged 15-49 who have undergone FGM in Africa, the Middle East, and Indonesia



**Notes:** In Liberia, girls and women who have heard of the Sande society were asked whether they were members; this provides indirect information on FGM since it is performed during initiation into the society. Data for Indonesia refer to girls aged 0 to 11 years since prevalence data on FGM among girls and women aged 15 to 49 years is not available. **Source:** UNICEF global databases, 2016, based on DHS, MICS and other nationally representative surveys, 2004-2015. [Map disclaimer](#)

10 | Multi-agency statutory guidance on female genital mutilation

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