

# **RMET**

## **Safeguarding Policy**

### **2023 - 2024**

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Mrs Agnes Hart	Headteacher, Deputy Designated Safeguarding Lead	
Mr Andy Smith	Assistant Headteacher, SENCO, CLA, Deputy Designated Safeguarding Lead	
Mrs Georgina Kershaw	Safeguarding Lead for RMGS Academy Committee	
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Mrs Zoe Huggett	Assistant Headteacher, Deputy Designated Safeguarding Lead	
Miss Laura Tullett	Assistant Headteacher, Deputy Designated Safeguarding Lead	
Mrs Lisa Wood	Home School Support Worker, Deputy Safeguarding Lead	
Mr Kyle Taylor	Safeguarding Lead for RMGS Academy Committee	

<b>TWYDALL PRIMARY SCHOOL</b>	<b>Twydall-office@rmet.org</b>	<b>01634 231761</b>
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Mrs Vicky Symons	Assistant Headteacher, Designated Teacher of CLA, Deputy Designated Safeguarding Lead	
Mrs Nikita Roscoe	Assistant Headteacher, Deputy Designated Safeguarding Lead	
Mrs K Moon	Safeguarding Lead for RMGS Academy Committee	

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Ms Tash Hurtado	CEO – for the Trust	
Mrs Kim Wilmer	Director of Education – for the Trust	
Mrs Agnes Hart	Headteacher – for RMGS	
Mrs Helen Robson	Headteacher – for RPS	
Mrs Louise Hardie	Headteacher – for TPS	

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## Document Change History

<b>Date:</b>	<b>Version:</b>	<b>Description of Changes:</b>
July 2022	1.0	First release of Safeguarding Policy 2022 - 2023
July 2023	2.0	KCSIE 2023 updates added to new version of policy for 2023 - 2024

## 1. Introduction

1.1. This policy aims to:

- promote safeguarding and child protection and to provide information about how we work to keep children safe;
- ensure that all staff are aware of and clearly understand their statutory safeguarding responsibilities;
- provide all members of staff with the information required to meet their safeguarding duty and protect children from harm;
- provide stakeholders with clear information relating to the Trust's safeguarding and child protection procedures; and to
- ensure that we are protecting children from maltreatment or harm.

1.2. This policy applies to all adults, including volunteers, working in or on behalf of our Trust and is an over-arching document which demonstrates how everyone working in or for our Trust shares a commitment to keeping children safe from harm and abuse. All staff members are advised to maintain an attitude of 'it could happen here' where Safeguarding is concerned and should always act in the interests of the child.

1.3. Everyone who comes into contact with children and their families has a role to play in ensuring the Safeguarding and child protection of our child.

1.4. At RMET we ensure that our approach to Safeguarding and Child Protection is child centred, ensuring at all times that we consider what is in the best interests of the child.

1.5. We understand that children can be abused by adults or by other children. We are committed to creating a culture of safety, that actively promotes children's welfare through training, education and robust response procedures.<sup>1</sup>

## 2. Legislation and Guidance

2.1. This policy has been developed in accordance with the following legislation/guidance:

Statutory Guidance:

- Keeping Children Safe in Education (2023);
- Working Together to Safeguard Children (2018);
- Multi-agency statutory guidance on female genital mutilation (July 2020).

Legislation:

- The Children Act 1989 and The Children Act 2004;
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015;
- The Rehabilitation of Offenders Act 1974;
- Safeguarding Vulnerable Groups Act 2006;
- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance);

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<sup>1</sup> For full details on how we work to prevent and respond to peer on peer abuse, please see Appendix A.

- The Education Act 2002;
- The Trust Staffing (England) Regulations 2009;
- Part 1 of the schedule to the Non-Maintained Special Trusts (England) Regulations 2015;
- The Equality Act (2010);
- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment);
- The Childcare Act 2006 (all Trusts with children aged under 8);
- Public Sector Equality Duty (PSED) referenced in KCSIE 2023;
- Human Rights Act 1998 referenced in KCSIE 2023.

The Trust also has regard to relevant non-statutory guidance relating to safeguarding, including:

- What to do if you are worried a child is being abused (2015);
- Guidance for safer working practice for those working with children and young people in education settings (2019 and the addendum added April 2020);
- Sexual violence and sexual harassment between children in Trusts and colleges (2021).

### 3. Statement of Equality

- 3.1. We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils with protected characteristics, as part of our commitments to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

### 4. Context

- 4.1. RMET is committed to Safeguarding and promoting the welfare of all our children. We recognise that some children may be especially vulnerable to abuse, and that children who are abused may find it difficult to develop a sense of worth and to view the world in a positive way. Whilst in our schools, their behaviour may be challenging and we recognise that some children who have been abused may harm others. We will always take a considered and sensitive approach in order that we can support all of our children and recognise that each child's welfare is of paramount importance.
- 4.2. Safeguarding and promoting the welfare of children is defined as:
- Protecting children from maltreatment;
  - Preventing impairment of children's mental and physical health or development;
  - Ensuring children are growing up in circumstances consistent with the provision of safe and effective care;
  - Taking action to enable all children to have the best outcomes.
- 4.3. Children includes everyone under the age of 18, but our policy reflects the support we offer to all our children including those who are aged 18 and attending our schools.
- 4.4. **Child protection** is one part of Safeguarding and promoting welfare and refers to the procedures that are undertaken to protect specific children who are, are believed to, or are likely, to suffer significant harm.



- 4.5. At RMET we ensure that our approach to Safeguarding and Child Protection is child centred, ensuring at all times that we consider what is in the best interests of the child.
- 4.6. We understand that children can be abused by adults or by other children. We are committed to creating a culture of safety, that actively promotes children's welfare through training, education and robust response procedures.<sup>2</sup>

### **Safeguarding Leads**

#### Trust Safeguarding Leads:

Mr Dave Brockman, Trustee, Safeguarding Lead for the Trust Board

Ms Tash Hurtado, CEO, Safeguarding Lead for RMET (Out of hours contact 07704 665461)

#### Rainham Mark Grammar School Safeguarding Team:

Mrs Georgina Kershaw, Academy Committee Member of RMGS, Safeguarding Lead for local governance

Mrs Kalgi Shah, Academy Committee Member of RMGS, Prevent Lead

Mrs Emma Horstrup, Deputy Headteacher, Designated Safeguarding Lead, Mental Health Lead

Mrs Agnes Hart, Headteacher, Deputy Designated Safeguarding Lead

Mr Andy Smith, Assistant Headteacher, SENCO, CLA, Deputy Designated Safeguarding Lead

#### Other staff with child protection and safeguarding responsibilities:

Mrs Jane Mayes -Head of Year 7

Mr Daniel Holeyman - Head of Year 8

Mr Dan Coker – Head of Year 9

Mrs Sarah Wilkins – Head of Year 10

Mr Gary Adkins – Head of Year 11

Mrs Jemma Wilson – Head of Year 12

Mr Joe Twizell – Head of Year 13

Mrs Jacqueline Curtis – Safeguarding Officer

Mrs Claire Else – Inclusion Manager

Mrs Sue Allen – RMGS Counsellor

Mrs Joanna Buckland- Pastoral Support Assistant

Mrs Julie Fox - Pastoral Support Assistant

Mrs Jayne Jeffrey – Pastoral Support Assistant

Mrs Sarah Kelly - Pastoral Support Assistant

Ms Gabrielle Stewart - Pastoral Support Assistant

Ms Claire Stewart - Pastoral Support Assistant

Mrs Gina Carter – Office Manager

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<sup>2</sup> For full details about how we work to prevent and respond to child on child abuse, please see Appendix A.

Riverside Primary School Safeguarding Team:

Mrs Helen Robson, Headteacher, Designated Safeguarding Lead, Designated teacher of CLA, Mental Health Lead

Mr Kyle Taylor, Academy Committee Member of RPS, Safeguarding Lead for local governance

Mrs Zoe Huggett, AHT, Deputy Designated Safeguarding Lead

Miss Laura Tullett, AHT, Deputy Designated Safeguarding Lead

Mrs Lisa Wood, HSSW, Deputy Designated Safeguarding Lead

Twydall Primary School Safeguarding Team:

Mrs Louise Hardie, Headteacher, Designated Safeguarding Lead

Mrs K Moon, Academy Committee Member of TPS, Safeguarding Lead for local governance

Mrs Vicky Symons, AHT Designated teacher of CLA, Deputy Designated Safeguarding Lead

Mrs Nikita Roscoe, AHT, Deputy Designated Safeguarding Lead

Out of Hours contact

During a school trip or visit, the EVC form requires a named member of the senior leadership team to provide their contact details for emergencies/safeguarding concerns. During out of hours activities run by the school such as extra-curricular clubs or sports fixtures, all staff leading these activities, must have the DSL/DDSL contact numbers saved to their phones for safeguarding concerns that emerge outside the school day. These numbers are shared and updated routinely with staff.

Named personnel with Designated Responsibility regarding allegations against staff are:

Trust Lead (in the event of an allegation against the CEO)

Mr David Brockman, Trust Safeguarding Lead

Trust Lead

Ms Tash Hurtado, CEO

Designated Trust Leads

Mrs Kim Wilmer, Director of Education

Mrs Agnes Hart (RMGS)

Mrs Emma Horstrup (RMGS)

Mrs Helen Robson (RPS)

Mrs Louise Hardie (TPS)

## 5. Scope

- 5.1. This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, Trustees, Academy Committee Members (local governors) and volunteers working in or on behalf of the Trust. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated.

## 6. Definitions

- 6.1. **Safeguarding and promoting the welfare of children** is defined in Keeping Children Safe in Education (KCSIE) 2023:

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

For the purposes of this policy, the term 'safeguarding' refers to everything that the Trust does to keep children safe and promote their welfare, including (but not limited to):

- supporting child's health, safety and well-being, including their mental health;
- meeting the needs of children with special educational needs and/or disabilities;
- the use of reasonable force;
- meeting the needs of children with medical conditions;
- providing first aid;
- educational visits;
- intimate care and emotional wellbeing;
- online safety and associated issues;
- appropriate arrangements to ensure Trust security, taking into account the local context;
- keeping children safe from risks, harm and exploitation;
- child protection.

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

- 6.3. **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. It can be perpetrated by an adult or adults known or unknown to a child, or a child or children known or unknown to the child. It can happen in person or online. Where abuse is perpetrated by another child, it is known as 'Child on Child' abuse.

6.4. **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development<sup>3</sup>.

6.5. **Child on child** abuse refers to the abuse of a child or children perpetrated by another child or children. Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).<sup>4</sup>

6.6. **Children** includes everyone under the age of 18, and those aged 18 attending RMET schools.

6.7. Within this policy:

- **'Parent/carer'** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents and foster carers;
- **'Staff' or 'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the Trust;
- Keeping Children Safe in Education (2023) may be abbreviated to 'KCSIE'.

## 7. Everyone's Invited

7.1. The Everyone's Invited campaign has rightly served to focus our minds on the need to continue to work together to protect children.

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<sup>3</sup> See Appendix B for more information about abuse and neglect.

<sup>4</sup> [Keeping Children Safe in Education \(2023\)](#)

- 7.2. At RMET we believe that Trusts play a crucial role in teaching children about sex and relationships, equality and diversity and modern citizenship as well as preparing them for the modern world. This is enacted through each Trust's culture, its curriculum, and all policies. We aim to give all children and staff a voice to enable them to act in a protective manner towards themselves and others. This includes developing a robust whistleblowing culture as well as fostering a culture of integrity and mutual respect.
- 7.3. We recognise that we have the responsibility of tackling sexual violence and harassment, instilling values in our stakeholders and encourage all to be driven by their strong moral compass. Like so much of education, our work must complement that undertaken by parents and carers so that young people receive a consistent message, and they can go about their lives free from harassment and abuse.
- 7.4. We will continue to engage with their stakeholders, listen to their concerns and signpost necessary support and provision within and beyond its Trusts. We ask that anyone who has experienced such behaviour, or who is suffering because of it, to report it to a member of RMET Safeguarding Team so they can be supported, and steps can be taken to address the issue.
- 7.5. A dedicated NSPCC helpline is now available to support anyone who has experienced sexual abuse in educational settings or has concerns about someone or the issues raised.
- 7.6. The dedicated NSPCC helpline is 0800 136 663 or by emailing [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Staff members can also seek support from their line manager or HR.



## 8. Confidentiality and Information Sharing

- 8.1. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Trusts and colleges have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between Trusts, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

The Trust adheres to the Data Protection Act (2018) and the General Data Protection Regulation (2018).

- 8.2. Sharing information with parents
  - 8.2.1. RMET will ensure the Safeguarding and Child Protection Policy is available publicly via the Trust website.

8.2.2. Where appropriate, we will discuss any concerns about a child with the child's parents. The Designated Safeguarding Lead (DSL/DDSL) or member of The Safeguarding Team will normally do this in the event of a concern, suspicion, or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL/DDSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the Local Authority children's social care team before doing so (see Section 6.2 for more details). In the case of allegations of abuse made against other children, we will normally notify the parent/carers of all the children involved.

### 8.3. Consent

- 8.3.1. The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.
- 8.3.2. As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.
- 8.3.3. When considering whether, or not, to share safeguarding information (especially with other agencies), RMET will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.
- 8.3.4. All staff in the Trust will be made aware of their duties in relation to Data Protection and safeguarding, particularly in respect of confidentiality. This includes the following:
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests;
  - Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts;
  - Timely information sharing is essential to effective safeguarding;
  - Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.<sup>5</sup>

## 9. Roles and Responsibilities

### 9.1. RMET Trust Board

- 9.1.1. Trustees will ensure that there are mechanisms in place to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities. Trustees will ensure that the Trust is working with local safeguarding partners and that the Trust contributes to multi-agency working,

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<sup>5</sup> See [Working Together to Safeguard Children \(2018\)](#), pages 18-22 for more information.

adhering to Working Together to Safeguard Children (2018). All those involved in governance will read KCSIE 2023 and a record will be kept of this.

9.1.2. Part 2 of KCSIE 2023 sets out the responsibilities Trust Boards and our Trustees will adhere to this guidance at all times. As part of these responsibilities the Trustees will:

- ensure that they comply with their duties under statutory guidance and legislation;
- work to facilitate a whole Trust approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- ensure that policies, procedure and training at the school are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- ensure that safeguarding training for staff, including online safety training, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, is integrated, aligned and considered as part of the whole Trust or college safeguarding approach and wider staff training and curriculum planning;
- ensure that the Trust takes into account local criteria for action and protocol for assessment and supply information as requested by the three safeguarding partners;
- ensure that the Trust has an effective safeguarding/child protection policy, which is published on the Trust website and review this annually;
- ensure that the Trust has systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible;
- ensure that the Trust takes safeguarding concerns seriously and takes the wishes and feelings of children into account;
- ensure that there are systems in place for children to safely express their views and give feedback on safeguarding practice;
- ensure that the Trust has a suitable behaviour policy for children in all schools and a Staff Code of Conduct;
- ensure that all staff undergo safeguarding and child protection training on induction;
- consider a whole-Trust approach to online safety, including the use of mobile technology in Trust;
- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- ensure that children are taught about safeguarding, including online safety. See section 12.7 and Appendix E of this policy for further information;
- ensure that an appropriate safeguarding response is in place for children who are absent from school, particularly repeatedly, and/or for prolonged periods, and children missing education;
- appoint an appropriate member of staff to the role of Designated Safeguarding Lead;
- ensure that appropriate filters and monitoring systems are in place to keep children safe online;
- ensure that there are appropriate procedures in place to manage safeguarding concerns, or allegations against staff; and

- respond to allegations of abuse against the Headteacher. The CEO or Chair of the Trust will act as the 'case manager' in the event that an allegation of abuse is made against the head teacher, where appropriate (see Appendix D).

## 9.2. The Headteachers/CEO

9.2.1. The Headteachers in school and the CEO at Trust level are responsible for the implementation of this policy. They will;

- ensure that this policy is reviewed annually and ratified by the Trust Board;
- ensure that this policy and associated procedures are adhered to by all staff and take action as necessary if not;
- ensure that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction;
- ensure that all staff are made aware of the named Trustee/AC member for safeguarding and the Designated Safeguarding Lead;
- ensure that the role of 'Designated Safeguarding Lead' is explicit in the role-holder's job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL/DDSL is absent;
- ensure that 'lead responsibility' for Filtering and Monitoring is added to the DSL/DDSL job description (and you understand what it involves);
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead;
- organise appropriate cover for the role of Designated Safeguarding Lead for any out of hours/out of term activities organised by the school and led by school staff;
- appoint a 'Designated Teacher for Looked After and Previously Looked After Children' to promote the educational achievement of children looked after and previously looked after;
- appoint a lead for online safety. This may be a DSL/DDSL. See guidance in Annex C of KCSIE;
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single central record is maintained with details of all members of staff who are in contact with children;
- manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns), about staff members (including supply staff, volunteers and contractors);
- respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the Trust works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to child protection plans and to protect children from harm;
- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);



- ensure that children’s social care (from the host Local Authority or placing authority) have access to the Trust to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2023).

### 9.3. The Designated Safeguarding Lead (DSL/DDSL)

- 9.3.1. The full responsibilities of the DSL/DDSL are set out in Annex C, KCSIE (2023).
- 9.3.2. Members of our Safeguarding Team are named on the front of this policy. The DSL/DDSL takes lead responsibility for child protection and wider safeguarding. When the DSL/DDSL is absent, the Safeguarding Team will act as cover. The Safeguarding Team will be trained to the same standard as the DSL/DDSL.
- 9.3.3. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL.
- 9.3.4. The Designated Safeguarding Lead will:
  - take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place);
  - act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
  - advise on the response to safeguarding concerns;
  - liaise with the Local Authority and work with other agencies in line with ‘Working Together to Safeguard Children (2018);
  - identify if children may benefit from Early Help Assessment/(Medway Family Solutions);
  - in liaison with the Headteacher, will refer suspected cases, as appropriate, to the relevant body (Local Authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
  - make referrals in line with the Prevent agenda where there is a radicalisation concern and/or support staff that make a referral to Channel;
  - Support the school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
  - refer cases to the police where a crime may have been committed;
  - be available during school hours for staff to discuss any safeguarding concerns. In the event that they are not available, a member of the Safeguarding Team will be made available;
  - undertake training to equip them with the skills to carry out the role and update every two years;
  - in liaison with HR, ensure all staff that work directly with children have read and understood Part 1 and Annex B of Keeping Children Safe in Education (September 2023). Ensure all staff that do not work directly with children have read either Part 1 or Annex A (as appropriate) of KCSIE 2023;
  - update their knowledge and skills regularly and keep up with any developments relevant to their role;

- provide staff in their school with the knowledge, skills and support required to safeguard children;
- take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- take responsibility for the transfer of safeguarding files when a child leaves the school; within 5 days for an in-year transfer, or within the first 5 days of the start of a new term to allow the new school/college to have support in place when the child arrives;
- attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- work closely with other relevant education professionals (e.g. SENDCO) to ensure children with additional vulnerabilities are safeguarded;
- help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the school leadership team;
- promote a 'culture of safeguarding', in which every member of the school community acts in the best interests of the child;
- regularly meet with the safeguarding Trustee/AC member and CEO to review safeguarding at the school and;
- liaise with the Headteacher regarding safeguarding cases and issues.

9.3.5. Details of the way to contact the DSL/DDSL or Medway Children's Services out of school hours are detailed at the front of this policy. This is for safeguarding advice in school arranged and led activities outside the school day such as after school enrichment or trips/visits.

#### 9.4. All Staff

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

- have a responsibility to provide a safe environment, where children can learn;
- will be trained so that they know what to do if a child tells them that he/she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse and neglect;
- will be made aware of systems in the Trust that support safeguarding and child protection;
- will be made aware of safeguarding issues that put children at risk of harm and behaviours associated with these risks;
- will be made aware through their safeguarding and online safety training, of their expectations, roles and responsibilities around filtering and monitoring systems;
- will receive and access directed updated training as appropriate;
- should ensure that they know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;
- will be made aware of and should be clear on the school procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;

- will be made aware of the Early Help Assessment process and understand their role in it;
  - should be prepared to identify children who may benefit from Early Help Assessment and will discuss early help requirements with the safeguarding lead in the first instance;
  - may be required to support social workers and other agencies following a referral;
  - will be made aware of the process for making referrals to Children’s Social Care (via the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
  - should be prepared to make referrals to the MASH if they have concerns about a child’s welfare and understand the role that they may be expected to play in such assessments;
  - will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety;
  - will receive safeguarding updates throughout the year as part of continuous professional development;
  - will be encouraged to contribute to the development of safeguarding policy and practice;
  - should always seek advice from the Designated Safeguarding Lead if they are unsure; and
  - all teachers should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).
- 9.4.2. All staff will be made aware of our systems and documents that support safeguarding, including this policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL/DDSL) and any deputies, the behaviour policy and the safeguarding response to children who are absent from school, particularly repeatedly, and/or for prolonged periods, and children missing education.
- 9.4.3. All staff that work directly with children will be provided with a copy of, and must read, Part 1 and Annex B of Keeping Children Safe in Education (September 2023) annually and will receive annually updated training on their safeguarding roles and responsibilities. All school staff and those working within our organisation will be asked to read Part 1 and Annex B to ensure that all can support our rigorous culture of safeguarding.
- 9.4.4. Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of Trust safeguarding policy or practice, they will speak to the Designated Safeguarding Lead without delay, so that additional training can be put in place.

## 10. Recognising Abuse: Training

- 10.1. The Trust is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. We strive to ensure that staff fully understand

their safeguarding responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect or harm.

#### 10.2. All Staff

- 10.2.1. All staff members will undertake safeguarding and child protection training at induction (including online safety, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, FGM, the Prevent duty and whistle-blowing procedures) to ensure they understand the Trust's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.
- 10.2.2. All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- 10.2.3. All Staff will also receive regular safeguarding and child protection updates (for example, through emails, briefing notes and INSET Days) as required, but at least annually.
- 10.2.4. Contractors /agency staff/volunteers will receive appropriate training, in line with the Trust HR policy as applicable.

#### 10.3. The DSL/DDSL

- 10.3.1. The DSL/DDSL will undertake child protection and safeguarding training at least every 2 years.
- 10.3.2. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSL/DDSL, or taking time to read and digest safeguarding developments).
- 10.3.3. They will also undertake Prevent awareness training and online safety training including an understanding the filtering and monitoring systems and processes in place.

#### 10.4. Trustees and Academy Committees

- 10.4.1. All trustees and AC members receive safeguarding training, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.
- 10.4.2. As the Chair of the Trust or a Trustee may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher or CEO, they should receive training in managing allegations for this purpose.

#### 10.5. Recruitment – interview panels

- 10.5.1. At least one person conducting any interview for a post at the Trust will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2023), and will be in line with local safeguarding procedures. Details of the trained panel member will be recorded on the interview paperwork.

#### 10.6. Supervision

- 10.6.1. All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## 10.7. Specific safeguarding issues

10.7.1. Staff will also receive specific training on the following issues and action will be taken if the Trust suspects that a child is at risk of or is the victim of:

- physical abuse;
- sexual abuse;
- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation (including involvement in county lines);
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- online safety, including understanding the filtering and monitoring systems and processes;
- child on child abuse including intra-familial harms and ‘teenage relationship abuse’;
- radicalisation and extremism;
- relationship abuse;
- serious violence;
- sexual violence or sexual harassment (including child on child abuse);
- sexting or sharing of youth produced sexual imagery;
- so-called ‘honour-based’ abuse;
- Mental health and wellbeing concerns;
- trafficking and modern slavery.

10.7.2. All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the Trust or school and/or can occur between children outside of these environments. All staff will be expected to consider whether children are at risk of abuse or exploitation in situations outside their families (extra-familial harm).

10.7.3. Staff will also be made aware of the additional safeguarding vulnerabilities of:

- children in the court system;
- children absent from school, particularly repeatedly, and/or for prolonged periods, and children missing education;
- children with family members in prison;
- children who are homeless;
- child who have or have had a social worker;
- children with special educational needs or disabilities (SEND), or certain medical or physical health conditions;
- children with particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race);
- children who are young carers;

- children looked after or previously looked after; and
- children with mental health problems.

## 11. Recognising and Responding to Abuse: How to take action

- 11.1. If a member of staff, parent or member of the public is concerned about a child's welfare, they should report it to a member of the Safeguarding Team as soon as possible. On occasions when the DSL/DDSL is not available, it should be reported to the Safeguarding Team. If in exceptional circumstances, the DSL/DDSL or Safeguarding Team are not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.
- 11.2. Although any member of staff can make a referral to children's social care, where possible there should be a conversation with a member of the Safeguarding Team. All staff must follow the procedures set out below in the event of a safeguarding issue.
- 11.3. All staff will be alert to indicators of abuse (including child on child abuse) and will report any of the following to the Safeguarding Team immediately:
- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
  - any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
  - any significant changes in attendance or punctuality;
  - any significant changes in a child's presentation;
  - any indicators that a child may be experiencing child on child abuse;
  - any concerns relating to people who may pose a risk of harm to a child; and/or
  - any disclosures of abuse that children have made.
- 11.4. More information about our approach to child on child abuse (including sexual violence and sexual harassment) can be found at Appendix A.
- 11.5. The following procedures are in line with statutory guidance (see Section 2. Referral procedures can be found in section 12).
- 11.6. If a child discloses that they are suffering or at risk of suffering abuse
- 11.6.1. If a child discloses that they have been abused in some way, the member of staff/volunteer will:
- listen to what is being said without displaying shock or disbelief;
  - accept what is being said;
  - allow the child to talk freely;
  - reassure the child whilst not promising them that it will be ok or that it might not be possible to keep;
  - never promise a child that they will not tell anyone;
  - reassure them that what has happened is not their fault;
  - stress that it was the right thing to tell;
  - listen, only asking questions when necessary to clarify;

- not criticise the alleged perpetrator;
  - explain what has to be done next and who has to be told;
  - make a written record but do not ask the child to write their own account (see Record Keeping); and
  - pass the information to the Designated Safeguarding Lead or a member of the Safeguarding Team without delay using the record procedures of each individual school. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 11.7), and tell the DSL/DDSL as soon as possible that you have done so.
- 11.6.2. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.
- 11.7. If a child is suffering or likely to suffer harm, or in immediate danger
- 11.7.1. If you think that a child is suffering or at risk of suffering significant harm, you must report this to the Safeguarding Team immediately.
- 11.7.2. Where possible, there should be a conversation with the Designated Safeguarding Lead but a referral must be made if a child may be suffering or at risk of suffering harm. **Anyone can make a referral to children's social care.** If anyone other than the Safeguarding Team makes a referral to children's social care or to the police, they should inform the DSL/DDSL as soon as possible.
- 11.8. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)
- 11.8.1. If you have any concerns about a child's welfare, please contact a member of the Safeguarding Team without delay.
- 11.8.2. The DSL/DDSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care. If it is decided to make a referral to children's social care the parent/carer will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 8.2 for more details.
- 11.8.3. All concerns, discussions and decisions will be recorded in writing.
- 11.8.4. The DSL/DDSL will provide guidance on the appropriate action. Options will include:
- managing any support for the child internally via the school pastoral support processes;
  - seeking advice from the local early help co-ordinator/s;
  - an Early Help Assessment; or
  - a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.
- 11.9. Early Help Assessment
- 11.9.1. All staff should be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. If Early Help is appropriate, the Safeguarding Team will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to

support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

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

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation;
- is at risk of Forced Marriage; it is 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;
- children with particular protected characteristics;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day, particularly repeatedly, and/or for prolonged periods.

#### 11.10. Referrals

11.10.1. If it is appropriate to refer the case to Local Authority children's social care or the police, the DSL/DDSL or Safeguarding Team member will do so. In the exceptional circumstances where you make a referral directly (see Section 10), you must tell the DSL/DDSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process.



This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

- 11.10.2. The Local Authority will make a decision about what course of action to take and will let the person who made the referral know the outcome. The DSL/DDSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.
- 11.10.3. If the child's situation does not seem to be improving after the referral, the DSL/DDSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.
- 11.10.4. The DSL/DDSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH/MARF), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Safeguarding Referrals must be made in one of the following ways:

**If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999.**

## 12. Specific Safeguarding Issues

- 12.1. For more information relating to specific safeguarding issues, please see Appendix B. For more information about child on child abuse, please see Appendix A.

### 12.2. Female Genital Mutilation (FGM)

- 12.2.1. Any staff member who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a child under 18 must immediately report this to the police, personally. This is a statutory duty, and staff will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL/DDSL and involve children's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a child under 18 must speak to the DSL/DDSL and follow our local safeguarding procedures.
- 12.2.2. The duty for staff mentioned above does not apply in cases where a child is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine children.
- 12.2.3. Any member of staff who suspects a child is at risk of FGM or suspects that FGM has been carried out must speak to the DSL/DDSL and follow our local safeguarding procedures.

### 12.3. Radicalisation and Extremism

- 12.3.1. All Trusts are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions to have "due regard" to the need to prevent people from being drawn into terrorism. In the event that concerns are raised relating to radicalisation and extremism, the DSL/DDSL should be informed immediately.

### 12.4. Children potentially at greater risk of harm (both online and offline)

- 12.4.1. The Trust recognises that some children need a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage.
- 12.4.2. The Safeguarding Team will hold information relating to social workers working with children at the Trust/college. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).
- 12.4.3. We will also act to promote the educational outcomes of and to protect:
- children who are absent from school, particularly repeatedly, and/or for prolonged periods, and children missing education;
  - children missing from home or care.
- 12.4.4. There are other familial issues that can have a detrimental impact on children. We work with other agencies in line with KCSIE 2023 to support children and families in the following circumstances:
- children facing the court procedures and/or children in the court system;
  - children with family members in prison;
  - children who are homeless;
  - children who need a social worker.
- 12.5. Mental Health
- 12.5.1. 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.
- 12.5.2. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health issue or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these experiences, can impact on their mental health, behaviour and education.
- 12.5.3. If staff have a mental health concern about a child we will respond to the concern, inform and discuss our concerns with the relevant pastoral leader and parents/carers where appropriate, to seek ways to support the child in and out of school.
- 12.5.4. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 11.
- 12.5.5. If you have a mental health concern that is not also a safeguarding concern, speak to a member of the Pastoral Team (secondary) or Head of Inclusion (primary) to agree a course of action.
- 12.5.6. Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, schools will provide information and signposting services to children and parents and assist with the teaching of emotional health and wellbeing to children through our curriculum.
- 12.5.7. Although a school can (only in consultation with, and if accepted by NELFT) make a direct referral to the North East London NHS Foundation Trust (NELFT), where it is deemed necessary and in a child's interest, the school will also request that the parent/carer request a CAMHS referral through their GP. In some cases, if it is felt that the parent/carer is not engaging with the school and other agencies to address a mental health issue with their child, a Safeguarding referral may be made by the school to Children's Services.

12.5.8. Staff at each school in the Trust receive training and support in working with children who have mental health difficulties.

12.5.9. Refer to the Department for Education guidance on mental health and behaviour in Schools<sup>6</sup> for more information.

#### 12.6. Child on Child Abuse

12.6.1. The Trust takes all reports and concerns about child on child abuse, including child on child sexual violence and harassment, very seriously. This includes any reports or concerns that have occurred outside of any of our school premises, or online.

12.6.2. In order to ensure that our policy on child on child abuse is well-promoted, easily understood and accessible, we have included information about our approach to minimising and responding to child on child abuse as an appendix. Full details of how the Trust prevents, responds to and supports victims of child on child abuse can be found at Appendix A. We also have a child-friendly Behaviour and Anti-Bullying policy outlining our approach to child on child abuse.

#### 12.7. Online Safety

12.7.1. Our Online Safety Policy can be found in Appendix E. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.

12.7.2. All staff are made aware of the Trust policy on Online Safety which sets our expectations relating to:

- creating a safer online environment including filtering and monitoring processes with clear lines of responsibility;
- training requirements; giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line; inspiring safe and responsible use and behaviour;
- safe use of mobile phones both within Trust and on Trust trips/outings;
- safe use of camera equipment, including camera phones; and
- what steps to take if you have concerns and where to go for further help.

12.7.3. Staff must read the Online Safety Policy in conjunction with our staff Code of Conduct in relation to personal online behaviour.

#### 12.8. Children's mobile phone and smart devices

12.8.1. We recognise that mobile phones and smart devices are part of everyday life for many children and that they can play an important role in helping children to feel safe and secure when travelling to and from school. However, we also recognise that they can prove a distraction from learning and can provide a means of child on child abuse or harassment. Therefore, children's mobile phones or smart devices are not permitted to be seen or heard at school. If a parent/carer would like their child to travel to or from school with a mobile phone, in secondary schools it must be turned off and in the child's bag or locker throughout the day. In primary schools, only children in Y6 and those with agreed exceptional circumstances for phone possession are permitted to bring them to school. Each day phones must be handed into the class teacher at the start of the day and collected at the end of the day. The Behaviour and Anti Bullying Policy of each school outlines the

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<sup>6</sup>[Mental Health and Behaviour in Schools](#)

sanctions for having a mobile phone, smart device or corresponding electrical accessory (e.g. ear pods/headphones), where applicable, along with information on confiscation. The Trust take no responsibility for any accidental loss or damage to mobile phones brought into school.

### 13. Children with special educational needs and disabilities (SEND)

13.1. We recognise that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

13.2. We offer extra support for children with SEND. This includes:

- personal safety skills activities, including sex and relationships education, travel training and stranger danger, that raises awareness of abuse for children with SEND and their ability to seek help;
- child support, which can have a beneficial effect on reducing bullying and enabling children to explore issues and make decisions;
- raising awareness about the abuse of children with SEND and challenging attitudes and assumptions that act as barriers to protection via staff CPD and assemblies;
- Promoting safe and accessible services;
- Ensuring that children with SEND are fully included and have access to the same information shared with other children in keeping themselves safe;
- Communicating appropriately e.g. using signs, symbols, electronic devices, or adapting the information, so that children with SEND are able to access the RSE curriculum and any safety training;
- Liaising with specialist services and other professionals to ensure children with SEND understand how to keep themselves safe and what to do if they are concerned;
- Liaising with parents/carers and signposting to services and resources which support the safety of all children e.g. NSPCC.

### 14. Children with a Social Worker and those that have previously needed a Social Worker

14.1. Children may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. We work with local authorities to ensure that we are providing effective support for this group of children.

14.2. The Safeguarding Team and all members of staff will work with and support social workers to protect vulnerable children.

- 14.3. Where we are aware that a child has a social worker, the Safeguarding Team will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare and educational outcomes. For example, it will inform decisions about:
- responding to unexplained/unauthorised absence or missing education where there are known safeguarding risks; and
  - the provision of pastoral and/or academic support.

## 15. Children Looked After and Previously Looked After (CLA)

- 15.1. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
- 15.2. Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements. The DSL/DDSL has details of children's social workers.
- We have appointed a designated teacher as detailed at the front of this policy who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.<sup>7</sup>
  - The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- 15.3. As part of their role, the designated teacher will:
- Work closely with the DSL/DDSL to ensure that any safeguarding concerns regarding looked after and previously looked-after children are quickly and effectively responded to;
  - Work with virtual heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how child premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

## 16. Record-Keeping

- 16.1. All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing and in most cases be referred to the DSL/DDSL.
- 16.2. When a child has made a disclosure, the member of staff/volunteer must:
- record as soon as possible after the conversation. Use the school system of recording using the referral;
  - not destroy any notes in case they are required later;
  - record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
  - Use the body map template to indicate the position of any injuries if relevant; and record statements and observations rather than interpretations or assumptions.

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<sup>7</sup> [Designed Teacher for Looked After Children](#)

- 16.3. All staff will receive training on what good recording of concerns looks like. All written records must to be given to a member of The Safeguarding Team promptly. No copies should be retained by the member of staff or volunteer.
- 16.4. The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Child Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.
- 16.5. Records will include:
- a clear and comprehensive summary of the concern including the date and time that the concern was raised;
  - details of how the concern was followed up and resolved; and
  - a note of any action taken, decisions reached and the outcome.
- 16.6. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with our records retention schedule.
- 16.7. If a child for whom the Trust has, or has had, safeguarding concerns moves to another school, the DSL/DDSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main child file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL/DDSL will speak to the DSL/DDSL of the receiving Trust and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- 16.8. Appendix C sets out our policy on record-keeping specifically with respect to recruitment and preemployment checks. Appendix D sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## 17. Relationships, Sex and Health Education (RSHE)

- 17.1. At RMET we believe that our high-quality Relationships and Sex Health Education will stay with our children for life. RSHE is not about encouraging young people to become sexually active nor is it about promoting any particular lifestyle of relationship choice. RSHE is about providing children with the knowledge, skills and confidence to make safe, healthy and informed relationship choices as young people and in the future as adults. RSHE at RMET is pioneering an innovative curriculum fit for the world our young people are living in. We believe in empowering our children to understand their bodies, to reflect on their relationship values and to be able to openly discuss relationships and sex. We believe that this approach will reduce the risk of unhealthy and abusive relationships. At RMET we are committed to the important role that RSHE plays child's holistic education and we aim to build on the RSHE programmes covered in schools. We introduce children to the importance of consent from Year 7 and this is revisited on a yearly basis and adapted to the age of each year group.

## 18. Safer Working Practice

- 18.1. We work to create and embed a culture of openness, trust and transparency, in which the Trust's values and expected behaviour (as set out in the staff code of conduct) are constantly lived, monitored and reinforced by all staff.
- 18.2. We expect all staff to act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the guidance contained in the staff handbook and the Adult Code of Conduct and Safer Recruitment Consortium Document Guidance for safer working practice for those working with children and young people in education settings (September 2019).<sup>8</sup>
- 18.3. Trustees and senior leaders will ensure that this policy is adhered to by:
  - ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others through effective training;
  - empowering staff to share any low-level safeguarding concerns;
  - create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online);
  - addressing unprofessional behaviour and supporting the individual to correct it at an early stage; and
  - providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- 18.4. Trustees will help to identify any weakness in the Trust's safeguarding system through their monitoring.
- 18.5. Staff are expected to adhere to the Code of Conduct at all times. In the event of any concerns or allegations, the Trust will deal with them promptly, in line with HR policy, local guidance and KCSIE (2023).
- 18.6. Staff use of mobile phones
  - 18.6.1. Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when children are not present. Guidance for staff is outlined in the Acceptable Use policy. Staff will not take pictures or recordings of children on their personal phones or cameras. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the Trust.

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

- 19.1. Allegations that may meet the harms threshold
  - 19.1.1. In the event that there is an allegation of abuse against a member of staff, we will adhere to Part 4, Section 1 of KCSIE (2023). See Appendix D for more details.

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<sup>8</sup> [safer Recruitment Consortium](#)

- 19.1.2. Allegations that may indicate that a person would pose a risk of harm if they continue to work in their present position or in any capacity with children in a Trust or college include:
- staff having behaved in a way that has harmed a child, or may have harmed a child;
  - staff possibly committing a criminal offence against or related to a child;
  - staff behaving towards a child or children in a way that indicates they may not be suitable to work with children; and/or
  - staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children.
- 19.1.3. This includes behaviour or incidents that have occurred both in or out of school.
- 19.2. Allegations against staff
- 19.2.1. If there is any concern about any member of staff, supply teacher or volunteer other than the Headteacher, including low level concerns, this must be reported to the Headteacher without delay. This includes supply staff, volunteers and anyone working in or on behalf of the Trust, whether paid or unpaid. Allegations against the Headteacher must be reported to the CEO and allegations against the CEO to the Chair of the Trust. In reporting allegations of abuse against staff or low level concerns, these must be immediately reported and not discussed directly with the person involved.
- 19.2.2. The Headteacher or CEO or Chair of Trust should consider if the concern or allegation meets the threshold for Investigating Officer intervention.
- 19.2.3. Allegations against staff relating to a position of trust will be referred to the Local Authority Designated Officer within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made and the police will be contacted if necessary.
- 19.2.4. A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, or would have been removed if they had not resigned.
- 19.2.5. Should there be information shared about an ex-member of staff, the Headteacher/CEO should refer that straight to the police.
- 19.3. Safeguarding concerns that do not meet the harm threshold (low level concerns)
- 19.3.1. In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of KCSIE (2023).
- 19.3.2. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the Trust or college may have acted in a way that:
- is inconsistent with the staff Code of Conduct, including inappropriate conduct outside of work; and
  - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 19.3.3. It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but might not be in specific circumstances, through to humiliating behaviour and that which is ultimately intended to enable abuse. We



will act quickly, proportionately and appropriately in the event of a low-level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of Trusts and colleges from potential false allegations or misunderstandings.

19.3.4. Staff will receive guidance about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2023).

#### 19.4. Reporting low level concerns

19.4.1. Low level concerns should be reported to the Headteacher.

19.4.2. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept for as long as this member of staff remains employed.

19.4.3. The Headteacher may:

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

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

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

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

19.4.6. HR will retain low level concerns information until the person is no longer employed by the Trust.

#### 19.5. Supply Staff

19.5.1. Although the Trust does not directly employ supply teachers, we will ensure that any concerns or allegations against supply teachers are handled properly. We will never cease to use a supply teacher for safeguarding reasons without finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome.

19.5.2. The school will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation. Trustees will be kept informed.

19.5.3. The Trust will inform supply agencies of its process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers.

## 20. Complaints and Concerns about Trust Safeguarding Policies

### 20.1. Complaints against Staff

- 20.1.1. Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with low level concerns or allegations of abuse made against staff (see Section 19).
- 20.1.2. If the Trust receives a complaint against a teacher who no longer works at the Trust, they will be referred to the police.

### 20.2. Other Complaints

- 20.2.1. The school Complaints Policy outlines full detail on the process for communicating any other complaints.

### 20.3. Whistle-blowing

- 20.3.1. The school has a clear Whistleblowing policy and procedures. This is available through the Trust's website. All staff have the ability to raise concerns. Staff have many routes in which to raise concerns.

## 21. Use of Trust or College Premises for Non-Trust Activities

- 21.1. The Trust Board check that any organisation using or hiring our premises ensures appropriate arrangements to keep children safe. Before the use is authorised assurances will be sought that there is an appropriate policy for safeguarding in place. As made clear in our Lettings arrangement any concern must be reported to the Trust. Failure to do so will terminate the agreement.
- 21.2. If a safeguarding allegation is received relating to an individual or organisation using the school premises, schools should follow their safeguarding policies and procedures, including informing the LADO.
- 21.3. When the Trust has organised services or activities which are under the direct supervision of school staff, the Trust arrangements for the protection of children apply.

## 22. How we Safeguard Children Attending Alternative Provision

- 22.1. When placing a child with an alternative provision provider, the Trust continues to be responsible for the safeguarding of that child. The individual school will undertake all checks necessary to satisfy ourselves that the provider meets the child's needs and keeps them safe.
- 22.2. Written confirmation will be sought to ensure all statutory safeguarding checks have been carried out for individuals working at the establishment which are in line with those we would conduct on our own staff. Safeguarding arrangements will be agreed, including the arrangements for reporting and monitoring children's attendance and progress.

## 23. Policy Implementation, Monitoring and Review

- 23.1. The policy will be reviewed annually by the Trust Board. It will be implemented through the professional development programme, and as part of day to day practice. Compliance with the policy will be monitored by the Designated Safeguarding Leads, Headteacher, CEO and through staff performance measures. In addition, we also work with the Local Authority and external agencies to undertake annual reviews of the implementation of this policy.

## 24. Managing Visitors

- 24.1. All visitors to the Trust and its schools must sign in using Inventory. All visitors must wear an appropriately coloured and labelled RMET lanyard indicating their status:

**Burgundy = 'RMET Governance' – on the SCR, fully DBS/section 128 checked**

**Black = 'RMET Staff' - on the SCR, fully DBS/section 128 checked where necessary/contractually employed by the Trust**

**Red = 'RMET visitor (supervised)' – Non DBS checked visitors who must be escorted on site at all times.**

**Blue = 'RMET visitor (unsupervised)' - DBS checked and approved visitors (such as contractors or supply staff) who can conduct their work in agreed areas without being escorted.**

- 24.2. Visitors to the site should normally have prearranged this visit. The notice below is displayed in reception of each school/Trust to manage expectations and safeguard staff and children from volatile situations:

**Staff and students at the Rainham Mark Education Trust have the right to work in a calm, respectful environment.**

**We will NOT tolerate verbal or physical threats or intimidating behaviour towards any student or any member of staff.**

**Any visitor found to be acting in such a manner will be asked to leave, with the possibility of legal action and a ban from school premises.**

**Thank you.**

24.3. Should parents/carers/visitors behave in an unsafe, intimidating or aggressive manner, this will be followed up by one or more of the following actions:

- a warning to ban from the premises;
- a ban from the premises;
- police involvement.

24.4. Guidance for managing visiting speakers to Trust sites can be found in Appendix G.

## 25. Monitoring Arrangements

25.1. This policy will be reviewed by the Director of Education annually.

25.2. At every review, the policy will be approved by the Board of Trustees.

## 26. Links with other Policies

26.1. The Safeguarding Policy is linked to the following policies:

- Behaviour and Anti Bullying Policy;
- Staff Code of Conduct;
- Complaints policy;
- Health and safety policy;
- Attendance policy;
- Online safety policy;
- SEND policy;
- Equality and Diversity policy;
- Sex and relationship education policy;
- Curriculum policy;
- Designated teacher for looked-after and previously looked-after children policy;
- Privacy notices;
- Whistle blowing policy;
- IT policy suite;
- Positive Handling Policy.

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

26.3. Please see Section 13 for further details about how we work to support children with special educational needs and disabilities (SEND).

## Appendix A: Child on Child Abuse

Child on child abuse is any abuse of a child or children that is perpetrated by another child or children. This includes all forms of sexual harassment, sexual violence and abuse. We commit to creating a culture of safety, where children are free from harassment or abuse of any kind. We take a zero-tolerance approach to any forms of abuse including sexual violence and sexual harassment – it is never acceptable and it will not be tolerated.

We know that even if we do not receive any reports relating to child on child abuse, it does not mean that it is not happening. We support and encourage anyone – especially our children – to come forward to share any concerns about child on child abuse so that we can take action to keep all children safe.

We will not down play incidents of banter as ‘having a laugh’ or being part of growing up. We have a zero-tolerance approach to low level abuse in our Trust because we understand that this could develop into an unacceptable culture. We are driven to prevent this becoming normalised.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children - ‘teenage relationship abuse’;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or 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; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).<sup>9</sup>

All children are capable of abusing their peers and we recognise that girls and are more likely to be the victims of child on child abuse, and boys’ perpetrators. All child on child abuse is unacceptable

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<sup>9</sup> [Keeping Children Safe in Education \(2023\)](#)

and will be taken seriously. All incidents are logged by the Safeguarding Team and data shared with the Trust Board.

### **Staff training**

All staff are made aware that children can abuse other children, that this can happen online or in person, at or outside of school. All staff will receive training so that they can confidently recognise the indicators and signs of child on child abuse in order to identify it and respond appropriately to reports. All staff will be made aware of the crucial role that they play in preventing child on child abuse and responding to it as necessary. It will be made clear that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

It is important that our staff are aware that children who are LGBTQ+ can be targeted by other children and it is vital that we provide a safe space for these children to speak out and share their concerns with members of staff.

### **Procedures for minimising opportunities for child on child abuse**

We recognise that a crucial part of our safeguarding responsibility is to minimise the opportunity for child on child abuse to occur. In order to do this, and to establish a safe environment for all children, we:

- ensure that a child's parent/carers are aware of our Behaviour and Anti-Bullying policy and sanctions for harassment and child abuse;
- have robust behaviour and anti-bullying policies, which makes it clear that we have a zero-tolerance approach to any kind of child on child abuse;
- ensure staff understand what is meant by child on child abuse and have clear information on referral routes and creating a safe culture for children;
- train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous);
- train staff thoroughly so that they are confident to challenge inappropriate behaviours between children, that are actually abusive in nature;
- never downplay certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it;
- refer to this in the staff Code of Conduct which governs how we expect all adults to behave;
- recognise that sexual harassment and sexual violence, as well as other forms of child on child abuse, may be happening even if they are not reported.

### **How we address child on child abuse within the curriculum and across the Trust**

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously. We ensure that children are aware of our safeguarding and child protection procedures, including how to raise concerns about child on child abuse.

### **Additional Vulnerabilities**

We recognise that some children may be more vulnerable to child on child abuse than others. For example, children who have already experienced abuse, those that have special educational needs or disabilities (SEND), children living in care and children who are LGBTQ+, may be more likely to face child on child abuse than other children. We recognise that girls are more likely to be the victims of child on child abuse than boys. Some children may face additional barriers to telling anyone about abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

### **How to report concerns**

#### **Our children**

It is repeatedly made explicit to children how and from whom they can seek help.

If a young person witnesses or experiences any form of child on child abuse, we strongly encourage them to speak to a trusted member of staff, parent or trusted adult about it. If a child discloses to an adult outside of the Trust, the adult should contact the Designated Safeguarding Lead without delay to report the issue.

All victims will be taken seriously, regardless of how long it has taken them to come forward and they will be supported and kept safe. Abuse that occurs online or outside of the Trust will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting child on child abuse, including sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report or have their experience minimised.

In school, children can:

- report issues of child abuse/harassment;
- speak to any member of staff about something that concerns them and staff will follow up;
- speak to any member of the Safeguarding Team;
- take a friend with them to report issues and can also request that a trusted adult speaks to a member of staff about concerns.

All of these methods can be used to report any form of harm or abuse, or can be used by children to share worries or concerns about any issue, including child on child abuse.

In the event that a child reports or discloses child on child abuse, we will take their report seriously, take prompt action to respond and to safeguard the child or children involved, and we will ensure that we are listening to the voice of the child when deciding on the best course of action to take. We will always act in the best interests of children. Following any disclosures or reports of child on child abuse, we will review our Trust systems, training and policies to determine if any learning can be derived from the situation to further strengthen our approach to this issue. We will always encourage our children to safely express their views and give feedback on how they have been supported following a safeguarding concern.

### **Our staff**

Any member of staff that has concerns about child on child abuse should follow the procedure set out in Section 11 and must report concerns immediately.

### **Others**

We encourage everyone to report any form of abuse or harm perpetrated by or against our children. Any concerns should be reported to the Designated Safeguarding Lead, using the details in 9.3 of this policy.

### **Wider concerns**

We strive to create a safe and welcoming environment for all children. If you have any concerns about our culture of safeguarding, policy or procedures, please direct these to safeguarding lead immediately, or follow our Trust Complaints Policy.

### **What happens when an allegation of child on child abuse is made?**

We will adhere to Keeping Children Safe in Education (2023). The DfE's standalone guidance on sexual violence and sexual harassment is now absorbed fully within KCSIE (where applicable) when responding to incidents of child on child abuse. The Trust takes child on child abuse seriously and will respond to all concerns or disclosures of child on child abuse, including those that have occurred outside of Trust and online, immediately.

Upon receiving a concern, report or disclosure of abuse, the Designated Safeguarding Lead, or member of the Safeguarding Team will decide what further action is necessary.

Our starting point regarding any report of child on child sexual harassment or violence should always be that there is a zero-tolerance approach, it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

The subsequent action taken will vary depending on the type of child on child abuse and the severity of the incident/s disclosed. The Designated Safeguarding Lead will take contextual factors into account when managing the report.

The Designated Safeguarding Lead and Safeguarding Team will always consider the following:

- the wishes of the victim in terms of how they want to proceed. The victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: the level of coercion or threat, whether a crime may have been committed and consideration of harmful sexual behaviour;
- both the chronological ages and developmental stages of the children involved;
- any power imbalance between the children, including consideration of the age of children and whether children have special educational needs or disabilities;
- the impact on the victim;
- that sexual violence and sexual harassment can take place in intimate personal relationships between children;
- if the alleged incident is a one-off or a sustained pattern of abuse;



- if are there ongoing risks to the victim, other children, adult students or staff;
- other related issues and wider context, such as links to child criminal or child sexual exploitation.

Depending on the nature of the incident/s, the Designated Safeguarding Lead may:

- seek further information from those involved and witnesses.
- undertake a risk assessment and needs assessment to ascertain steps necessary to safeguard the victim, alleged perpetrator, adults and other children.
- use the Brook Sexualised Behaviours Traffic Light Toolkit
- decide to manage the concern internally.
- organise a meeting with relevant staff and agencies to assess risk and agree a safety plan.
- refer the victim and/or the perpetrator to local services for Early Help Assessment.
- refer the case to Children's Services via a MASH referral.
- liaise with social workers working with children involved (if applicable).
- make a report to the police.
- liaise with specialist services.

In the event of a disclosure of child on child sexual violence, we will make an immediate Safeguarding Risk and Needs Assessment. The risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- siblings and the risk of intrafamilial harms following a report of sexual violence and/or harassment
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult children and staff) at the Trust or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

More information about these options in relation to sexual violence and sexual harassment can be found in Part 5 of KCSIE (2023).

### **Recording procedures**

Members of staff will follow the procedures for recording a disclosure as outlined in Section 11 and 16 of this policy. All child on child abuse is unacceptable and will be taken seriously. All incidents are logged by the Safeguarding Team and data is reviewed by the Trust Board.

### **How we support victims of child on child abuse**

The school recognises that child on child abuse has a significant impact on young people and victims are likely to need ongoing support. Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. Age appropriate support will be put in place for victims of child on child abuse whilst investigation is taking place and following the initial response. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care. We will do everything we can to maintain the victim's normal routine. We will do everything we can to protect the victim from further bullying, harassment or abuse as a result of their disclosure.

If a victim of child on child abuse moves to a new setting, the Designated Safeguarding Lead will share the necessary information to ensure that support for the child continues.

### **How we will support alleged perpetrators and perpetrators of child on child abuse**

We have a responsibility to safeguard and support all children. We will adhere to KCSIE (2023) when managing reports of child on child abuse and decide on action and support on a case by case basis.

The Trust has a responsibility to ensure that an alleged perpetrator continues to receive a suitable education and will consider a range of options in continuing educational provision if they are unable to attend school. Options may include:

- adjustments to the school day, e.g. start and finish times;
- respite placement or alternative provision;
- opportunities for one to one work with a member of the Safeguarding Team or Senior Leadership Team.

We recognise that children who perpetrate child on child abuse may be being abused themselves. We will continue to safeguard the alleged perpetrator and provide them with support.

A plan to reduce the risk posed by the alleged perpetrator will be put in place as part of the Safeguarding Risk and Needs assessment made following the alleged abuse. The Designated Safeguarding Lead will take advice from children's social care, specialist services and the police as necessary.

The school may choose to impose a sanction or punishment on the alleged perpetrator following an incident of child on child abuse. In this case, we will follow our Behaviour Policy in determining the level and severity of sanction.

Where a child is cautioned or receives a conviction related to an incident of child on child abuse, the school will update the Safeguarding Risk and Needs Assessment and hold a professionals' meeting to determine actions for the child/children involved.

If the alleged perpetrator moves to another setting, the Designated Safeguarding Lead will share information as necessary to safeguard the individual and other children at the new setting.

### **How we will support other children who may have been affected by child on child abuse**

- One to one pastoral support;
- Mentoring from trusted staff member or peers;
- Emotional and social regulation interventions;
- A safe space for social times;
- Communication between key members of staff;
- Sign-posting and referral to relevant support services;
- Liaison with police support officers as appropriate.

### **Parent/carers**

Parent/carers will be informed of incidents unless sharing information puts a child at greater risk of harm. Children will always be encouraged to speak to parents about child on child abuse unless it puts them at greater risk of harm.

**Wider response**

We will keep detailed records of any incidents of child on child abuse and will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will take appropriate action. Consideration will be given to whether there are wider cultural issues that enabled the inappropriate behaviour to occur and in order to minimise it happening again, we may:

- make adjustments to our curriculum, assemblies and weekly pastoral themes to promote children's awareness on particular issues or topics;
- seek feedback from children and parent/carers by way of surveys;
- deliver additional staff training;
- review policies that link to the safety and attitudes of children.

## Appendix B: Types of Abuse

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.

**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.

**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 nonpenetrative 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.

**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.

### **Children who are persistently absent and missing from education**

A child being absent from education for prolonged periods and/or on repeat occasions particularly repeatedly, or going missing from education, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- are at risk of harm or neglect;
- are at risk of forced marriage or FGM;
- come from Gypsy, Roma, or Traveller families;
- come from the families of service personnel;
- go missing or run away from home or care;
- are supervised by the youth justice system;
- cease to attend a school;
- come from new migrant families.

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. **We will always follow up with parents/carers when children are not at school.** This includes informing the Local Authority if a child leaves 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 suffering or likely to suffer from harm, or in immediate danger.

### **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Indicators of CCE can include a child:

- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- suffering from changes in emotional wellbeing;
- misusing drugs and alcohol;
- going missing for periods of time or regularly coming home late;
- regularly missing school or education;
- not taking part in education.

If a member of staff suspects CCE, they will discuss this with the Safeguarding Team. The DSL/DDSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

### **Serious violence**

Signs that a child is at risk from, or involved with serious violent crime include:

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing;
- signs of assault or unexplained injuries; and/or
- unexplained gifts or new possessions, which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as

- being male;
- having been frequently absent or permanently excluded from school; and/or
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

If a member of staff suspects a child is involved in or at risk of serious violent crime, they will discuss this with the Safeguarding Team. The DSL/DDS will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Children and young people often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share

sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- having an older boyfriend or girlfriend;
- suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the Safeguarding Team. The DSL/DDSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate.

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

### **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a Trust's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If we have concerns about a child and possible risk of being drawn into cyber-crime, the designated safeguarding lead (or a deputy) will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. We may also put Early Help support in place and will refer to children's social care if we think a child is suffering or is at risk of suffering harm.

<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>



### **Domestic abuse**

Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The 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. 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.

Older children may also experience domestic abuse and/or violence in their own personal relationships, 'teenage relationship abuse'. See Appendix A: Child on child abuse for more details.

At RMET we are working in partnership with Medway Local Authority to identify and provide appropriate support to children who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass. On receipt of any information, the Designated Safeguarding Lead will decide on the appropriate support the child requires, this could be silent or overt.

We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

The DSL/DDSL will provide support according to the child/children's needs and update records about their circumstances.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The Safeguarding Team will be aware of contact details and referral routes to the Local Authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures). Where a child has been harmed or is at risk of harm, the DSL/DDSL will also make a referral to children's social care.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL/DDSL, who will activate local safeguarding procedures.

### **Female Genital Mutilation**

The DSL/DDSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Section 12 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a child is at risk of FGM.

Indicators that FGM has already occurred include:

- A child confiding in a professional that FGM has taken place
- A family member disclosing that FGM has been carried out
- A family/child already being known to social services in relation to other safeguarding issues
- A girl:
  - having difficulty walking, sitting or standing, or looking uncomfortable;
  - finding it hard to sit still for long periods of time (where this was not a problem previously);
  - spending longer than normal in the bathroom or toilet due to difficulties urinating;
  - having frequent urinary, menstrual or stomach problems;
  - avoiding physical exercise or missing PE;
  - being repeatedly absent from school, or absent for a prolonged period;
  - demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
  - being reluctant to undergo any medical examinations;
  - asking for help, but not being explicit about the problem;
  - talking about pain or discomfort between her legs.

Potential signs that a child may be at risk of FGM include:

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

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

### **Forced marriage**

Forcing a person into marriage before their 18th birthday is a crime even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a child is being forced into marriage, they will speak to the child about their concerns in a secure and private place. They will then report this to the DSL/DDSL.

The DSL/DDSL will:

- speak to the child about the concerns in a secure and private place;
- activate the local safeguarding procedures and refer the case to the Local Authority Designated Officer;
- seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk);
- refer the child to a member of the safeguarding team or external agency key worker as appropriate.

### **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. Parent/carers 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 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 Trusts 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 Trust. However, it should be clear to the Trust who has parental responsibility.

School staff should notify a member of the Safeguarding Team when they become aware of private fostering arrangements. A member of the Safeguarding Team will speak to the family of the child involved to check that they are aware of their duty to inform the Local Authority. The school/Trust has a duty to inform the Local Authority of the private fostering arrangements.

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

### **Preventing radicalisation**

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

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.

This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- endangers or causes serious violence to a person/people;
- causes serious damage to property; or
- seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Trusts have a duty to prevent children from being drawn into terrorism. The DSL/DDSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our schools 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 partners and local police force.

We will ensure that suitable internet filtering and monitoring processes are in place, and equip our children to stay safe online at school and at home. See Appendix E.

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 children's behaviour. The government website [Educate Against Hate](#)<sup>10</sup> and charity [NSPCC](#)<sup>11</sup> say that signs that a child is being radicalised can include:

- refusal to engage with, or becoming abusive to, children 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;

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<sup>10</sup> [Educate against Hate](#)

<sup>11</sup> [NSPCC](#)

- 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 may 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.

If staff are concerned about a child, they will follow our procedures set out in Section 11 of this policy, including discussing their concerns with a member of the Safeguarding Team. Staff should always take action if they are worried.

### **Missing children**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow our safeguarding processes for monitoring and responding to unexplained absences, contacting the Local Authority Admissions and Participation Team to make a referral. We may also make a referral to children's social services and/or the police.

## Appendix C: Safer Recruitment

We adhere to Part 3 of Keeping Children Safe in Education at all times. We consider safeguarding throughout the recruitment process, including when defining and advertising roles.

We will record all information on the checks carried out in each school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **Pre-appointment safer recruitment**

We will include the following in all job advertisements:

- our commitment to safeguarding and promoting the welfare of children;
- clear confirmation that safeguarding checks will be undertaken;
- the safeguarding responsibilities of the post as per the job description and personal specification; and
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

Where a role involves engaging in regulated activity relevant to children, we will include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

All applicants will be provided with a copy of the Trust Safeguarding policy and the policies and practices for child protection in the application pack. They will be directed to the link for this on the Trust's website.

### **Applicants**

We require applicants to provide:

- personal details, current and former names, current address and their national insurance number;
- details of their present (or last) employment and reason for leaving;
- full employment history, (since leaving Trust, including education, employment and voluntary work) including reasons for any gaps in employment;
- qualifications, the awarding body and date of award;
- details of referees/references; and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

We will not accept copies of curriculum vitae in place of an application form.

### **Shortlisting and selection**

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. For more details of what this will contain, please see Part 3 of Keeping Children Safe in Education (2023).

At least two people will carry out shortlisting and they will explore any potential concerns, including inconsistencies and/or gaps in unemployment.

We will seek references on all shortlisted candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children. RMET expectation is that two references should be collected. The minimum that will be accepted is one from the previous employer.

When asked to provide references, we will ensure the information confirms whether we are satisfied with the applicant's suitability to work with children and provide the facts of any substantiated safeguarding allegations.

The HR officer will consider carrying out an online search on shortlisted candidates to help identify any issues that are publicly available online.

### **Interviews**

During the interview process at least one person on an interview panel should have completed the training for Safer Recruitment. Children will be included in the recruitment process in meaningful ways with their voice given careful consideration.

### **New staff**

When appointing new staff, we will:

- verify a candidate's identity. This includes demonstrating an awareness for the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available;
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children). When using the DBS update service, we will ensure that the Trust obtains the original, physical certificate;
- obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available; the single central record (SCR) will indicate if a standalone children's barred list check was completed and a certificate obtained;
- verify the candidate's mental and physical fitness to carry out their work responsibilities using the Home Office guidance or by obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that there are not sanctions against them;
- verify the person's right to work in the UK, including EU nationals;
- if the person has lived or worked outside the UK, make any further checks the Trust or college consider appropriate;
- verify professional qualifications, as appropriate; and
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order.
- check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State.

**Regulated activity** means a person who will be:

- responsible, on a regular basis in a school, for teaching, training, instructing, caring for or supervising children; or
- carrying out paid, or unsupervised unpaid, work regularly in a school where that work provides an opportunity for contact with children; or
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- we believe the individual has engaged in relevant conduct; or
- the individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the Trust has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- an enhanced DBS check with barred list information for contractors engaging in regulated activity;
- an enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children;
- we will obtain the DBS check for self-employed contractors;
- we will not keep copies of such checks for longer than 6 months;
- contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances;
- we will check the identity of all contractors and their staff on arrival at the Trust.



### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- never leave an unchecked volunteer unsupervised or allow them to work in regulated activity;
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;
- carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment;
- ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Governance**

- All Trustees and Academy Committees members will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.

**All Trustees and Academy Committee members** will also have the following checks:

- a section 128 check (to check prohibition on participation in management under [Section 128 of the Education and Skills Act 2008](#));
- identity;
- right to work in the UK;
- other checks deemed necessary if they have lived or worked outside the UK;
- the chair of the board will have their DBS check countersigned by the secretary of state.

### **Staff working in alternative provision settings**

Where we place a child with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

**Checking the identity and suitability of visitors**

All visitors will be required to sign in to our Inventory system.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in and wear a visitor's badge.

Visitors to the Trust who are visiting for a professional purpose, such as educational psychologists and Trust improvement officers, will be asked to show photo ID and the organisation sending the professional, such as the LA or educational psychology service, will provide annually written confirmation that an enhanced DBS check with barred list information has been carried out, this must be shown by the visitor.

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

**Adults who supervise children on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

## Appendix D: How the Trust Responds to Allegations that may meet the Harms Threshold

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

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

It applies regardless of whether the alleged abuse took place in the Trust or elsewhere. Allegations of historical abuse against a teacher who is no longer teaching, will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Our procedures for dealing with allegations will be applied with common sense and judgement.

For more information about how the Trust responds to low-level concerns (concerns do not meet the harms threshold) please see Section 19.3 of this policy.

### **Suspension of the accused until the case is resolved**

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. We will seek views from our HR advisers, the Local Authority Designated Officer/s, the police and/or Children's Social Care (as appropriate).

Based on an assessment of risk, we will consider alternatives such as:

- redeployment within the Trust so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying the individual to alternative work in the Trust so that they do not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted;
- temporarily redeploying the individual to another role in a different location, for example to an alternative school.

### Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence);
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Headteacher or CEO or Chair of the Trust (where the Headteacher/CEO is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the LADO;
- This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police);
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies;
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate;
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Trust and their contact details;
- **If it is decided that no further action** is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation;

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in Trust and/or liaise with the police and/or Children's Social Care services as appropriate;
- Provide effective support for the individual facing the allegation or concern, including appointing a single point of contact from the Trust to keep them informed of the progress of the case and considering what other support is appropriate;
- Inform the parent/carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parent/carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent/carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice;
- Keep the parent/carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence);
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child;
- If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency;
- Where the police are involved, wherever possible the Board of Trustees will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Trust's disciplinary process, should this be required at a later point.

#### **Additional considerations for supply staff**

If there are concerns or an allegation is made against someone not directly employed by the Trust, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

We will never cease to use a supply teacher for safeguarding reasons without first finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome. The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the Trust, while the Trust carries out the investigation.

We will involve the agency fully, but the Trust will take the lead in collecting the necessary information and providing it to the Local Authority designated officer as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week;
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days;
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the Trust ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the Trust's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and HR Team will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

#### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

#### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the Headteacher, or other appropriate person in the case of an allegation against the Headteacher, will consider whether any disciplinary action is appropriate against the child/children who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a child.

#### **Confidentiality**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- who needs to know about the allegation and what information can be shared;

- how to manage speculation, leaks and gossip, including how to make parent/carers of a child/children involved aware of their obligations with respect to confidentiality;
- what, if any, information can be reasonably given to the wider community to reduce speculation;
- how to manage press interest if, and when, it arises.

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the Trust will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

### **Learning lessons**

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the Local Authority's designated officer to determine whether there are any improvements that we can make to the Trust's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- issues arising from the decision to suspend the member of staff;
- the duration of the suspension;
- whether or not the suspension was justified;
- the use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

## Appendix E: Online Safety Policy

Teaching children to stay safe online and keeping children safe online in school is a crucial part of safeguarding. It is essential that children are safeguarded from potentially harmful and inappropriate online material. We take a whole Trust approach to online safety to protect and educate children and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Our approach to online safety runs through every aspect of our work with children, including (but not limited to):

- curriculum planning and RSHE;
- teacher training;
- the role and responsibilities of the designated safeguarding lead;
- parental engagement;
- Induction of staff, volunteers and children; and
- Resource management.

The Safeguarding Team take responsibility for online safety, including online safety and understanding the filtering and monitoring systems and processes in place. The DSL/DDSL attends training regularly to ensure that they understand the unique risks associated with online safety and to ensure that they are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at Trust.

### **Providing a safe system**

The school will continue to ensure that appropriate filters and monitoring systems are in place to protect children when they are online on the school's IT systems or recommended resources.

- For the purposes of home learning, only approved platforms are used and secured by our IT department;
- Children may be directed to other websites for specific purposes. The online safety implications of any website are carefully considered before use;
- The Trust IT team and school Designated Safeguarding Teams have day to day responsibility for online safety and will maintain an active oversight of the management of any home learning from a safeguarding perspective. Procedures will be kept under review and action will be taken swiftly if concerns about the use of technologies arise;
- The Trust will keep in regular contact with parents/carers, updating them as appropriate with information on how they can keep their children safe online and any new developments.

### **Risks to children**

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:



- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-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.

We refer to these four areas of risk when planning our approach to online safety and ensuring that we are safeguarding children against a broad spectrum of potential online harms.

### **The Principles of remaining safe online that we share with children:**

#### **Conduct – Contact - Content**

- Conduct yourself appropriately;
- Limit your contacts to people you KNOW;
- Post content that is appropriate and cannot be misconstrued or misinterpreted;
- Understanding the risks to children.

#### **Contact**

Accepting ‘friends’ who may not be who they say they are. These may, occasionally, be sexual predators, aiming to groom children, sometimes with the intention of meeting them offline. They may also be people using the internet to threaten, intimidate or bully. Disclosing personal information i.e. names, ages, addresses, details of schools attended - including identifiable photos, or personal passwords.

#### **Conduct**

- Children and young people can also be the perpetrators of cyber-bullying or abusive behaviour online Cyberbullying; research suggests that around 60% of children and young people have experienced cyber-bullying;
- Prejudice driven abuse and malicious communications e.g. homophobia, hate websites, inciting violent extremism;
- Reputational risk: posting inappropriate content online may become public and permanent. Further education institutes, or job providers, are increasingly checking informal information, such as Facebook profiles, when assessing a person’s application for work or training.

#### **Content**

- Exposure to illegal material – child pornography or extreme violence;

- Exposure to sexualised material which may cause distress e.g. adult pornography, or material that might promote premature engagement in sexualised behaviour e.g. sexually provocative dress;
- Exposure to websites which advocate unhealthy or dangerous behaviour e.g. pro-anorexia, pro-suicide sites.

#### **Reporting an online issue, advice for staff:**

- Any child protection or safeguarding concern must be reported to the Safeguarding Team without delay;
- Concerns about the safety of procedures, behaviours or use of technology should be referred to the Safeguarding Team and IT Manager;
- Routine queries about the use of apps or online materials should be addressed to your line manager or ICT Manager, depending on the nature of the issue;
- UKSIC's Professionals Online Safety Helpline is a good source of external advice.

#### **Reporting an online issue, advice for children:**

- Speak to a trusted adult at home;
- Email/talk to a member of our Safeguarding team (see posters in each school and the front page of the Safeguarding policy);
- Contact Childline 0800 1111 or click CEOP <https://www.ceop.police.uk/safety-centre/>

#### **Filtering and monitoring**

Any incidents of inappropriate or concerning keywords being entered onto a monitored device due to a child's activity will automatically send a notification to the Safeguarding Team whom can assess the context and determine if the incident is a legitimate concern to be entered into CPOMS, or if it requires no further action.

Any inappropriate or concerning keywords entered on monitored devices by a staff member will trigger an automatic notification being sent to the Headteacher whom can assess the context and determine whether further action needs to be taken.

The appropriateness of any filters and monitoring systems will be informed in part, by the risk assessment required by the Prevent Duty.

Trustees should greater risk of harm

review the filtering and monitoring standards annually to inform what more needs to be done to support schools in this standard.

#### **Children's mobile phones and smart devices**

We recognise that mobile phones and smart devices are part of everyday life for many children and that they can play an important role in helping children to feel safe and secure when travelling to and from the school. However, we also recognise that they can prove a distraction from learning and can provide a means of child abuse or harassment. Therefore, children's mobile phones or smart devices

are not permitted to be seen or heard at the school. If a parent/carer of a secondary aged child would like their child to travel to or from school with a mobile phone, it must be turned off and in the child's bag or locker throughout the day. In our primary schools, only children in Y6 or those with agreed exceptional circumstances are permitted to bring phones to school. These must be handed into the class teacher at the start of the day and collected at the end of the day. The secondary Behaviour Policy outlines the sanctions for having a mobile phone, smart device or corresponding electrical accessory (e.g. ear pods/headphones), along with information on confiscation. The Trust takes no responsibility for any accidental loss or damage to mobile phones brought into school.

### **The role of parents/carers**

- It is the responsibility of parents/carers to ensure that children are monitored in their use of technology for home learning as they would ordinarily do when their children are using technology at home. Monitoring screen time is particularly important;
- While children are working from home, they are connected to their home broadband so their traffic doesn't go through the RMET firewall – parents will therefore need to ensure that age-appropriate filtering or safe search is enabled at home. Information on setting this up can be found at: <https://saferinternet.org.uk/>
- Social media, networking apps and gaming platforms are particularly popular at the moment. Parents are advised to be mindful of age restrictions and to oversee their child's social media activity;
- The Trust will update parents on online safety matters as required. Parents are requested to heed the Trust's advice and contact the school if they have concerns or encounter risk online.

### **Regular review of our approach to online safety**

We recognise that technology, and risks and harms related to it, evolve and change rapidly. We carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. This is informed by local and national training and regular updates.

### **More information**

For more information about online safety, please see Part 2 of Keeping Children Safe in Education (2023).

<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

### **Keeping your child safe and reporting an online issue for parents:**

Please find some useful links to help safeguard your child and Online safety tips for children:-

[Thinkuknow](#) provides advice from the National Crime Agency (NCA) on staying safe online

Parent info is a collaboration between [Parentzone](#) and the NCA providing support and guidance for parents from leading experts and organisations.

[Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support.

[Internet matters](#) provides age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world.

[London Grid for Learning](#) has support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online.

[Net-aware](#) has support for parents and carers from the NSPCC, including a guide to social networks, apps and games.

[Let's Talk About It](#) has advice for parents and carers to keep children safe from online radicalization.

[UK Safer Internet Centre](#) has tips, advice, guides and other resources to help keep children safe online, including parental controls offered by home internet providers and safety tools on social networks and other online services.

## Appendix F: RMET Searching and Confiscation Procedures

### **Introduction**

Under The Education Act 1996, the Headteacher and authorised staff members (SLT/DSL/Pastoral leaders) can search children, including their bags, phones/devices and their lockers, **with their consent** for any item. The ability to give consent may be influenced by the child's age. In a secondary school setting, it is assumed that all children will be able to give consent. In this context, permission does not need to be sought from parents or carers. **In primary settings, consent must be sought from parents** before a search is conducted.

**Consent is not required** if a the Headteacher/senior staff believe a child to be in possession of any of the following:

- Knives or weapons, laser pens, alcohol, illegal drugs and other substances, for example 'legal highs', tobacco and cigarette papers, e-cigarettes, fireworks and pornographic images;
- Any article that the school reasonably suspects has been, or is likely to be, used to commit an offence, or to cause personal injury, or damage to property;
- Any item banned by the school rules which has been identified as an item which may be searched for;
- Any item which the school believes to have been stolen.

Trust staff are at liberty to confiscate any prohibited item found as a result of a search and to retain such items that are confiscated for the duration of any subsequent investigation. They are also at liberty to seize any item, however found, that they believe to be harmful or detrimental to school discipline. The school will always pass on to police the following items if found during a search:

- Stolen items;
- Controlled drugs;
- Extreme or child pornography;
- Any weapons or items which are evidence of an offence.

In searching children, **staff must pay heed to Article 8 of the European Convention on Human Rights**; children have a right to respect for their private lives and in the context of these particular powers, this means that children have the right to expect a reasonable level of personal privacy. This right under Article 8 is not absolute, it can be interfered with, but any interference with this right by the school must be justified and proportionate.

### **Before searching**

A search without consent can only be undertaken if there are reasonable grounds for suspecting that a child may have in their possession a prohibited item. In each particular case, it must be decided what constitutes reasonable ground for suspicion, for example other children may be talking about the item, or the odd behaviour of a child, or the suspected child may be exhibiting suspicious behaviour. Staff may also view CCTV footage if available to decide whether to conduct a search. A member of SLT/DSL must be present during all searches and no search should take place without the express authorisation of the Headteacher (or DHT when deputising at the point authorisation is required).

***Please note that searches without consent can only take place on the school premises or if elsewhere, where the member of staff has lawful control or charge of the children, for example on a school trip.***

The member of staff carrying out the search must also be the same sex as the child being searched and there must be a witness who, if at all possible, should ideally be the same sex. There is however an ***exception to this rule***: a search may be carried out on a child of the opposite sex and without a witness present, but only if there is a reasonable belief that there is a serious risk of harm if the search is not carried out immediately, and where it is not reasonably practicable to summon a second member of staff.

Due regard must also be given to the child's right to a reasonable level of personal privacy, so it should be ensured that the child is taken to an office or classroom away from other children. In the case of a whole class having to be searched, for example if a knife has gone missing during a practical lesson, having informed the whole class that they will be searched, ask if there is anyone who is not comfortable for this to take place in a group setting and ensure they are searched somewhere more private.

It is good practice to remain calm and courteous when searching a child, clearly explaining why you are searching them and thanking them for their cooperation in helping to ensure that the school community remains safe. With such an approach, it is far more likely that the child will cooperate.

#### **During the search**

Having explained to the child that you need to search them, give them the opportunity to give up the item voluntarily, for example by saying ***“Do you have anything in your possession today that you know you should not have and if so, would you like to give it to me?”***. Often a child may give up whatever it is they have to avoid the situation escalating. If the child refuses to cooperate with the search, the school can apply an appropriate disciplinary sanction. If the child refuses and you believe them to have in their possession something which could cause harm, isolate them and inform them that you are calling the police to search them.

It is worth noting that staff can use such force as is reasonable given the circumstances when conducting a search for knives or weapons, alcohol, illegal drugs, stolen items, tobacco, fireworks, pornographic images or articles that have been, or could be used to commit an offence or cause harm; however, we would discourage this in all but the most extreme cases, when an imminent threat is posed to the school community. ***In such extreme circumstances where reasonable force is deemed necessary this should pay due attention to the RMET Positive Handling Policy.***

The member of staff ***may not ask the child to remove anything other than outer clothing***. 'Outer clothing' means any clothing that is not worn next to the skin or immediately over a garment that is being worn as underwear; ergo, the child can be asked to remove gloves, scarves, shoes, coats and jumpers. Possessions means any goods over which the child has or appears to have control, which includes lockers and bags. Possessions must only be searched in the presence of the child and another member of staff, except where there is a serious risk that extreme harm could arise if the search is not conducted immediately. All Trust staff are required to familiarise themselves with the [case study for child Q](#). With this in mind, it must always be weighed up what immediate risk there is to

necessitate a search in the absence of 2 members of school staff. Any member of staff conducting a search is advised to wear surgical gloves when doing so, for their own protection.

Please conduct the search as follows:

- Remove coat and/or blazer and search all pockets (after removal);
- Run hands over the inside of the garment when it is laid flat on a table to check that nothing has been concealed in the lining. Pay particular attention to holes in the lining;
- Ask the child to remove jumper and ask them to pull out the breast pocket of shirt to demonstrate there is nothing concealed;
- If trousers are being worn, ask the child to turn out all pockets completely (do not pat down) to check nothing is concealed;
- If you suspect items have been hidden in underwear, summon police to search ensuring a suitable adult is present (this should be a parent/carer where possible). ***Searching underwear, under these parameters, would only be required where there is measured likelihood that an item being concealed there would pose a significant threat to the child or school community. School staff have a duty of care and should under no circumstances enable a search to take place on school premises in the absence of a responsible adult (parent/carer/suitably qualified member of the safeguarding team);***
- Ask the child to pull their waistband out to demonstrate nothing concealed;
- Ask the child to remove shoes and feel inside the shoes;
- Ask for trouser legs to be raised and socks pulled down to check nothing concealed;
- Empty bag out and check all pockets and the lining. Be particularly aware if there are holes in the lining;
- Check inside pencil cases and anything else that could be used to conceal an item;

At the end of the search thank the child for their cooperation and explain you will be writing to their parent/carer to explain.

### **Searching a whole class**

There may be some situations where a whole class has to be searched, for example, if a sharp implement e.g. knife/scalpel/tweezers has gone missing during a Food Technology/DT/Science or Art lesson. All departments where knives or similar such implements are used must have a strict policy of counting out and counting in at the end of the lesson. If such an implement appears to be missing, the following procedure should be followed:

- Call for a member of SLT/Safeguarding Team;
- Ask all children to stop what they are doing and be seated;
- Conduct a search of the waste bins in case the knife has accidentally been thrown away;
- Check in all cupboards, drawers and anywhere else the item could have been concealed;
- When the member of SLT/ST arrives, explain that because a knife has gone missing, the whole class will be searched;
- Ask the children if anyone has accidentally concealed it and would like to give it in;
- Every member of the class must then be searched as above;
- When all members of the class have been searched or the missing item has been found, the class may be dismissed.

### **After the search**

The member of staff conducting the search can seize anything they have reasonable grounds for suspecting is a prohibited item or is evidence in relation to an offence. Alcohol and tobacco should be disposed of and **not returned** to a child or their parent/carer. Where controlled drugs are found, these must be delivered to the police as soon as possible, as must stolen goods and any weapons or items which are evidence of an offence. If a pornographic image or extremist material is found, the member of staff may dispose of the image unless its possession constitutes a specified offence (extreme or child pornography or extremist material) in which case, it must be passed to the police. Images found on a mobile phone or other electronic device can be deleted by a member of staff, unless it is necessary to pass to the police for the reasons stated above. Where a member of staff finds an item which is banned under the school rules, but that does not pose an imminent threat to the safety of the school community, they should use their professional judgment to decide whether to return it, retain it or dispose of it. Finally, please ensure that for each child who is searched, a search checklist is completed (Appendix F1) and a search letter (Appendix F2) sent to the parents/carers of the child who has been searched. In the case of a whole class being searched, one search checklist for the class will suffice.



## Appendix F1

Searching a Child – RMET Guidance and check list for Staff.

If you are called upon to search a child, please ensure you are fully familiar with the ‘RMET Searching and Confiscation Procedures’ and adhere to the following checklist/guidance:

	√	Comment if needed
<b>NEVER</b> search alone, <b>ALWAYS with a member of SLT/DSL</b> . Search all pockets in blazers and outdoor coats		
Tell the child that you are going to search them and why.		
Explain to them that you understand it is not nice for them, but that we have to put the safety of the school community first and we hope they will cooperate.		
The search must take place away from other children/staff <b>with a member of SLT /DSL present</b> .		
Wear rubber gloves for hygiene purposes.		
We can only search outer clothing, so children cannot be asked to remove shirts, trousers or skirts.		
If you suspect a child has concealed something in their underwear, <b>the police must be called to deal with it</b> .		
Ask child to turn all trouser pockets inside out		
Ask child to take off shoes and pull down tops of socks		
Check all compartments in school bags		
When you have finished the search, thank the child for their cooperation and explain that a letter will be sent home informing parents of the search.		
<p>A) If nothing found, child can return to lesson.</p> <p>B) If prohibited items found, child to write a statement immediately.</p> <p>C) Pass any prohibited items to DSL.</p> <p>D) Bag any weapons to avoid touching (envelope, plastic bag, disposable glove).</p> <p>E) If a child is in possession of an offensive weapon, <b>detain them and contact DSL/Headteacher</b> who will make the decision as to whether police should be called to arrest.</p> <p>F) If abusive or unsuitable material is found on mobile phones or electronic devices please delete it. (<b>*EXCEPTIONS – see below</b>)</p> <p>G) <b>*In the case of extreme or child pornography and extremist view, please pass to DSL who will contact the police.</b></p>		
Request search letter to be sent to parents/carers. (Appendix F2)		

Member of Staff Present Number 1:

Name.....

.....

Signed.....

.....

Date.....

.....

Time.....

.....

Member of Staff Present Number 2:

Name.....

.....

Signed.....

.....

Date.....

.....

Time.....

.....

## Appendix F2

### Standard letter for when a child has been searched

I am writing to inform you that xxxx was searched in xxxx School on the DATE. In accordance with our Behaviour Policy, xxxx School has the right to search children and their lockers with consent for any item. If we suspect a child to be in possession of prohibited items however, then we have the authority to search children *without* consent.

xxxx was searched as we had information that led us to believe that he/she may have been in possession of a prohibited item. Under Section 89 of the Education and Inspections Act, The school has the statutory powers to carry out such a search, without written consent or parental permission.

I am pleased to report that on this occasion, nothing was found.

OR

During this search, a prohibited item was found in xxxx's possession. We will be writing to you separately with regards to any sanctions that may be subsequently imposed.

In accordance with both our Behaviour Policy and statutory guidance, THIS/THESE ITEMS will be passed to the police, along with your child's details. (If drugs/weapons/stolen property/extreme or child pornography/item likely to be used to commit a criminal act.)

Please refer to our Behaviour Policy, which can be found on the school website, to familiarise yourself with our school rules on items that are prohibited in school. It is always unfortunate to have to carry out searches in school, but we are sure you understand that one of our key responsibilities is to ensure the safety and well-being of our children at all times; we thank you for your support in enabling us to do this.

Yours sincerely,

Headteacher, XXXXX School

## Appendix G: Visiting Speaker Guidelines

We welcome a wide range of visiting speakers to RMET and to minimise risk, we would like to draw your attention to the following guidelines:

That we are fully supportive of fundamental British values, which include democracy, the rule of law, individual liberty and mutual respect, and a tolerance of those with different faiths and beliefs.

Our Trust is not a platform for individuals who might espouse racist, homophobic, sexist, ageist or extremist views or anyone who might be trying to incite young people to violence or extremism of any form.

We welcome people of all backgrounds, ethnicities, beliefs and experiences and we look forward to hearing what you have to share with us.

**The speaker must reply with confirmation that this is read and understood.**

The Trust will ensure that any visiting speakers who might fall within the scope of the Prevent duty, whether invited by staff or children, are suitable and appropriately supervised. Our responsibility to our children is to ensure that the information they receive is aligned to the values of our Trust and British values which include democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Staff organiser: .....

Name of the Speaker: ..... Institution:.....

Subject of the visit: .....

Year group involved: ..... Date of the visit:.....

1. Outside speakers discussed with the Headteacher: Yes/No
2. Biography of the speaker or institution provided and attached: Yes/No
3. Assurances that all information communicated by the visitor will be lawful: Yes/No
4. Internet search on visitor/speaker completed and attached: Yes/No
5. Conversation with speaker regarding the content of the speech, including an understanding that their presentation will be brought to an early end if the content proves unsuitable: Yes/No
6. Headteacher's permission for fundraising, if applicable: Yes/No
7. Visiting Speaker Guidelines\* sent out to the speaker: Yes/No
8. Permission from Headteacher granted: Yes/No

Organiser's signature ..... Date: .....

Headteacher's signature: ..... Date: .....

I agree to abide by The Trust's equality commitments; that there will be no statements which might cause offence to others, or otherwise undermine tolerance of other faiths or beliefs; and there will be no extremist material.

Guest Speaker's signature:: ..... Date: .....

Visiting Speaker Evaluation Form

Speaker, subject, and date of visit:

Organising teacher:

Feedback from staff:

Any contentious subject areas or comments:

Would you book the speaker again in the future? Why or why not?

Any other comments?

Organiser signature and date:

\*Pass completed evaluation form to the Designated Safeguarding Lead