



# Child Protection Policy for the Agora Learning Partnership

(Adopted from Hertfordshire County Council)

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## 1. INTRODUCTION

**Copies of this policy and a copy of Part One of the latest version of Keeping Children Safe in Education (KCSiE) should be provided to all staff at the point of induction and thereafter, whenever the policy is updated.**

### **Purpose of a Child Protection Policy**

- To inform staff, parents/carers, volunteers, governors, the Partnership's central team and trustees about the Trust-wide responsibilities for safeguarding children.
- To enable everyone to have a clear understanding of how these responsibilities should be carried out.

### **Hertfordshire Safeguarding Children Partnership Procedures**

The Agora Learning Partnership follows the procedures established by the Hertfordshire Safeguarding Children Partnership (HSCP); a guide to procedures and practice for all agencies in Hertfordshire working with children and their families.

<https://hertsscb.proceduresonline.com/index.htm>

### **Responsibilities**

All Agora Learning Partnership Trustees, Governors, employees (including supply staff), contract workers and volunteers have a responsibility to provide a safe environment in which children can learn.

Staff and volunteers in schools are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children.

So that all Agora Learning Partnership staff are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow, they will receive appropriate safeguarding children training, including online safety, updated every three years as a minimum. In addition, all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively.

Temporary/supply staff, contractors and volunteers will be made aware of the safeguarding policies and procedures by the DSL, including as a result of sharing The Child Protection Policy and Code of Conduct.

## Introduction

All members of the Agora Learning Partnership must acknowledge their responsibilities with regards to the safeguarding of children and young people and recognise that through their day to day contact with them they are well placed to identify signs of risk and harm; safeguarding is defined as:

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

With this in mind, all of the Partnership schools agree that, in order to protect children and young people and to prevent them from being at risk of harm, they will ensure that wherever possible the children and young people in the Partnership:

- Will be offered an organisational culture that promotes the importance of the safety of children and young people;
- Are protected because the organisational ethos and culture ensures staff and volunteers feel safe, are encouraged to talk and are listened and responded to when they have concerns about the safety and wellbeing of a child;
- Are protected because staff maintain an attitude of 'it could happen here' and 'it could be happening to this child' where safeguarding is concerned;
- Are protected because staff always act in the best interests of the child;
- Will be offered clarity in relation to the standards in behaviour expected of all children and young people;
- Will benefit from a school ethos that helps them to be safe, resilient and robust and where mutual respect and shared values are a key feature in each educational setting;
- Feel safe in school (as school may be the only stable, secure and consistent environment in their lives) but know their safety is also of paramount importance to school staff outside of their time in school;
- Are confident and have high self-esteem;
- Are offered effective lines of communication, which will help them to build trusted relationships;
- Have the right to speak freely and are able to voice their values and beliefs;
- Are encouraged to respect each other's values and support each other;
- Are protected because the organisational ethos and culture ensures children feel secure, are encouraged to talk and are listened and responded to when they have a worry or concern;
- Know that there are adults in their school whom they can approach if they are worried;
- Are protected as a result of parental participation;
- Will be offered planned learning opportunities within the curriculum provision that helps them protect and safeguard themselves, including through learning about being safe online;
- Have equal right to be protected from harm;
- Are offered support which matches their individual needs, including those who may have experienced abuse;
- Are provided with all they need to ensure they flourish emotionally, socially and educationally (as a happy, healthy, sociable child or young person will achieve better overall);
- Will be protected by members of the Partnership as they will always strive to prevent abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and

inappropriate risk taking;

- Will be protected by members of the Partnership as all Trustees, centrally based staff, governors, school staff and visitors understand they have an important role to play in safeguarding children and young people and protecting them from abuse.

However, even though the members of the Partnership are well placed to reduce the potential of children being at risk from harm, sadly, some children and young people will still experience different forms of abuse in their lives. It is clear to all involved that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Therefore, it is important to understand that abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action when such circumstances become apparent; such lack of action would, most certainly, result in children and young people being placed further at risk. Clearly, children and young people could potentially be protected and risks minimised if they receive the right help at the right time; this could, in fact, deescalate the potential harm. Partnership schools must therefore learn from poor practices, which include:

- Failing to listen to the views of a child;
- Failing to act on and refer the early signs of abuse and neglect;
- Sharing information too slowly and a lack of challenge to those who appear not to be taking action;
- Failing to re-assess concerns when situations do not improve;
- Poor record keeping.

### **Agora Learning Partnership safeguarding aims**

Thinking carefully about all the safeguarding information available and in order to safeguard the children in the Agora Learning Partnership, the Trust aims to:

- Ensure that every member of the Agora Learning Partnership understands that safeguarding is everybody's responsibility and every effort should be made to safeguard children during and beyond the school day;
- Offer a child-centred and coordinated approach to safeguarding;
- Listen carefully to all children and young people and communicate effectively in order to help children build trusted relationships;
- Act in the interests of the child or young person where matters pertain to safeguarding;
- Protect all children and young people from maltreatment wherever possible;
- Prevent the impairment of children and young people's mental or physical health or development;
- Ensure that children and young people grow up in circumstances consistent with the provision of safe and effective care;
- Take prompt action to protect a child or young person where the child or young person is suffering from, or is likely to suffer from, significant harm;
- Take actions to enable all children and young people to reach their full potential and have the best outcomes;

- Develop staff awareness of the risks and vulnerabilities that children and young people face;
- Reduce the potential risks children and young people face of being exposed to violence, extremism, exploitation or victimization;
- Alert staff to the signs and indicators that suggest all might not be well with a child or young person;
- Address all safeguarding concerns at the earliest possible stage in the least intrusive way;
- Ensure that all staff identify pupils who would benefit from 'early help' and offer additional support to a child or young person if it is felt this is needed to promote their welfare, even if s/he is not suffering harm and is not at immediate risk;
- Identify and protect the most vulnerable by identifying individual needs and designing plans to meet those needs;
- Make clear to all the role of the Designated and Deputy Designated Safeguarding Leads;
- Make and keep accurate records of all matters pertaining to safeguarding;
- Work in partnership with children, young people, parents/carers and agencies;
- Ensure that safeguarding-related policies and practices are of a high standard and that they are implemented consistently in order that they protect children and young people effectively;
- Carry out, to a high standard, safeguarding duties and promote the welfare of children and young people in line with guidance from the Department for Education.

### **Implementation, Monitoring and Review of the Child Protection Policy**

This policy will be reviewed at least annually by the Trust Board. It will be implemented through the school's induction and training programme, and as part of day-to-day practice. Compliance with the policy will be monitored by the DSL in each school and through staff performance measures, as well as monitoring and evaluation exercises carried out by the Partnership's Chief Executive Officer/Safeguarding Lead and the Partnership's Trustee responsible for safeguarding.

## **2. STATUTORY FRAMEWORK**

In order to safeguard and promote the welfare of children, the Agora Learning Partnership, and the schools within it, will act in accordance with the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Education Act 2002 (Section 175/157)  
*Outlines that Local Authorities and School Governing Bodies have a responsibility to "ensure that their functions relating to the conduct of school are exercised with a view to safeguarding and promoting the welfare of children who are its pupils".*
- Hertfordshire Safeguarding Children Partnership Procedures Manual (Electronic)
- Keeping children safe in education – Statutory guidance for schools and colleges (DfE, September 2022) - <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working Together to Safeguard Children (DfE 2018)
- Working together to safeguard children – A guide to inter-agency working to safeguard and promote the welfare of children (July 2018) - <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

- The Education (Pupil Information) (England) Regulations 2005
- Sexual Offences Act (2003)
- Section 26, The Counter Terrorism and Security Act 2015 (PREVENT duty)
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry, which includes taking someone overseas to force them to marry whether or not the forced marriage takes place)
- Serious Violence Strategy 2018
- Equality Act 2010 (including the Public Sector Equality Duty)
- The Human Rights Act 1998
- Apprenticeships, Skills, Children and Learning Act 2009
- Sexual Violence and Sexual Harassment between Children in School and Colleges (DfE 2022)

### 3. THE DESIGNATED SAFEGUARDING LEAD (DSL) AND DEPUTY SAFEGUARDING LEAD (DDSL)

#### The Role of the Designated Safeguarding Lead and other Staff

NAME AND ROLE OF THE DESIGNATED SAFEGUARDING LEAD TAKING LEAD RESPONSIBILITY AT (NAME OF SCHOOL): \*\*\* [\[Please see policy on school website for information\]](#)

NAME AND ROLE OF THE DEPUTY DESIGNATED SAFEGUARDING LEADS AT (NAME OF SCHOOL): \*\*\* [\[Please see policy on school website for information\]](#)

#### *Leadership and Management*

The Designated or the Deputy Designated Safeguarding Leads will:

- Take the lead responsibility and management oversight for safeguarding and child protection in their school as they are most likely to have a complete picture of safeguarding;
- Work to build a culture of openness and transparency within the school where all staff are able to demonstrate an understanding of their role and responsibility to safeguard and promote the welfare of children and young people;
- Ensure that the appropriate filters and monitoring systems are in place in order to safeguard children and young people from potential harmful and inappropriate material online (for further information about online safety, including when children are working remotely, see Keeping children safe in education – Statutory guidance for schools and colleges (September 2022, section 135-148, pages 35-38);
- Attend refresher training relevant to the role every two years (and Prevent Awareness Training every three years) as well as attending further training that means they have the knowledge and skills required to carry out their role and responsibilities confidently and competently;

Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- 1) Understand the assessment process for providing early help and statutory intervention,

including local criteria for action and local authority children's social care referral arrangements

- 2) Have a working knowledge of how Hertfordshire organisations conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- 3) Understand the importance of the role the designated safeguarding lead has in providing information and support to children's social care in order to safeguard and promote the welfare of children
- 4) Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- 5) Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- 6) Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners (full details can be found in Chapter one of Working Together to Safeguard Children)
- 7) Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- 8) Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- 9) Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- 10) Obtain access to resources and attend any relevant or refresher training courses
- 11) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them

- Ensure that, if they resign from their post or if they no longer have responsibility for safeguarding and child protection, they complete a full face to face handover/exchange of information with the new post holder (*note: in exceptional circumstances, when a face to face handover is unfeasible, the Headteacher/Head of School will ensure that the new post holder is fully conversant with all procedures and case files*).

### *Meeting the Needs of Children*

The Designated and/or the Deputy Designated Safeguarding Leads will:

- Offer a child-centred and coordinated approach to safeguarding;
- Consider how to support children who have experienced abuse in order that their mental and physical health is not impacted
- Listen carefully to the views of children and young people and take their concerns seriously;
- Ensure regularly promoted, easily understood and easily accessible systems are in place that enable children and young people to safely express their views and give feedback or confidently report any form of abuse
- Act at all times in the best interests of the child or young person with regards to matters pertaining to safeguarding, ensuring that the wishes and feelings of the child or young person concerned are taken into account when deciding what action to take



- Focus on securing improved outcomes for children and young people and consider what difference support or interventions for children and young people who have experienced safeguarding related circumstances will make or have made on children/young people's lived experiences, whether they are in school or learning remotely;
- Take responsibility for promoting the educational achievement of children and young people who have a Social Worker have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales;
- Contact the Child Protection Consultation Hub when advice is needed regarding child protection concerns which possibly meet the threshold for statutory intervention;
- Complete Child Protection Contact Referrals for all cases of suspected abuse or neglect where there is a risk of significant harm to the child/young person, Police where a crime may have been committed and to the Channel programme where there is a radicalisation concern;
- Ensure that the provision offered to children and young people at the school helps them to learn about keeping themselves safe, including with regards to online safety.

### *Working with Stakeholders*

The Designated and/or the Deputy Designated Safeguarding Leads will:

- Liaise with the Executive Headteacher/Headteacher/Head of School and, where appropriate, keep them abreast of cases (including with regards to ongoing enquiries under Section 47 of the Children Act 1989 and police investigations) and other child protection-related matters;
- Have conversations, build relationships and maintain professional curiosity;
- Share expertise related to child protection with staff and provide support and advice in relation to safeguarding concerns in order that staff members can carry out their safeguarding duties effectively;
- **Always be available (during school hours)** to the staff in order that they can share their concerns as they arise (*note: if in exceptional circumstances, the Designated Safeguarding Lead (and Deputies) is not available, this should not delay appropriate action being taken - staff should speak to a member of the Senior Leadership Team and/or take advice from Children's Social Care; in these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or Deputies) as soon as is practically possible*);
- Ensure all staff know the arrangements for reporting child protection concerns out of school hours or outside of term time;
- Organise and, at times, deliver training to staff about child protection;
- Offer appropriate challenge to colleagues from other organisations and services if a child or young person's situation does not improve;
- Not disclose to a parent or carer any information held on a child or young person if this would put the child or young person at risk of significant harm - in such circumstances advice will be sought from Children's Social Care to ensure such errors are not made;
- Work with the administrative team to ensure the school holds more than one contact number for each child or young person;
- Liaise with and, where appropriate, work closely with Children's Social Care, the Police, Health Services and other services to promote the welfare of children and/or young people and protect them from harm, providing information and reports as required – for example, to support Social Workers to carry out a statutory assessment;
- Where 'early help' is deemed appropriate, generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate, whilst keeping any such cases under constant review and referring to Children's Social Care for assessment for statutory services if the child/young person's situation does not appear to be improving or is getting worse;
- Be fully engaged, involved and included in safeguarding arrangements and will work with Hertfordshire Safeguarding Children's Partnership (HSCP) to:



- Safeguard and promote the welfare of children e.g. by supplying required information
- Keep abreast of the latest local policies relating to safeguarding arrangements and ensure these are reflected in school-based arrangements;
- Keep abreast of the training opportunities on offer for staff
- Liaise with the Local Authority and the Local Safeguarding Children Board and work with other agencies in line with information detailed in documents provided by the Department for Education;
- Share information with appropriate staff in relation to a child's looked after (CLA) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility;
- Ensure they have details of the CLA's social worker and the name of the virtual school Head Teacher in the authority that looks after the child or those currently working with a social worker;
- Meet regularly (at least termly) with the Designated Governor for Safeguarding and share information about child protection and safeguarding (excluding any confidential details about specific children/young people and their families).

### *Referrals and Cases*

The Designated and/or the Deputy Designated Safeguarding Leads will:

- Manage child protection contract referrals and cases
- Decide whether, as a result of a concern raised by a member of staff, to make a referral to the most appropriate body, such as the Channel Programme (if there is a concern with regards to a child or young person being radicalised), the Early Help Team or Children's Social Care (note: it is important to remember that any staff member can refer their concerns to Children's Social Care or the Channel Programme directly should they so wish and that they will be supported by the Designated Safeguarding Lead);
- Where appropriate, make prompt child protection and contract referrals (and, where appropriate, support other staff to do the same) to Social Care, the Local Authority's Designated Officer, the Disclosure and Barring Service and/or the Police, in order to safeguard children and young people and protect them from harm (note: The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information MUST NOT be allowed to stand in the way of the need to promote the welfare and protect the safety of children – for further information about The Data Protection Act 2018 and UK GDPR in relation to safeguarding (including a Data Protection Toolkit for School) see pages 29 and 30 of the Keeping children safe in education – Statutory guidance for schools and colleges (September 2022));
- With the help of the Special Educational Needs and Disabilities Coordinator, if appropriate, complete an Early Help Assessment (EHA) and/or organise a 'Team around the Child' meeting if a child/young person and their family would benefit from co-ordinated support from more than one agency (for example education, health, housing and the local constabulary) - identify in the assessment what help the child/young person and their family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment;
- Take the appropriate action if a member of staff informs him/her that a child or young person is potentially missing from school, as this is a possible indicator of abuse or neglect.

### *Policy and Practices*

The Designated and/or the Deputy Designated Safeguarding Lead will:

- Ensure the following (up to date) policies are in place:
  - Child Protection Policy

- Behaviour Policy (which will include information about the measures in place to prevent bullying, including cyber, prejudice-based and discriminatory bullying)
- Staff Code of Conduct (which will include information about low-level concerns, allegations against staff, whistleblowing, acceptable use of technologies, staff/pupil relationships and communication)
- Safeguarding-related policies, such as those pertaining to children missing from education
- Ensure that all school policies, procedures and actions related to safeguarding comply with the law and guidance (statutory and non-statutory) from the Department for Education;
- Regularly review (at least annually) and update school policies related to safeguarding, placing them on the website so that they are available publicly and so that parents and carers are aware of the school's statutory role regarding the safeguarding of children, including with regards to referrals about suspected abuse or neglect;
- Ensure that the Trust's Safeguarding (including Child Protection) Policy and the relevant documentation from the Department for Education have been read, understood and implemented effectively by all staff (part time/temporary/supply), volunteers and contractors;
- Ensure that 'safer recruitment' policies and procedures, including the required checks that work to ensure that those coming to work at the Academy pose no risk to children and young people, are implemented in order to stop those who pose a risk to children and young people being able to work with them;
- Spend public money wisely in relation to the safeguarding of children and young people, targeting resources appropriately.

### *Recording and Reporting*

The Designated and/or the Deputy Designated Safeguarding Leads will:

- Ensure that safeguarding and child protection information is dealt with in a confidential manner - staff will be informed of relevant details only when the Designated or Deputy Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family (written records will be made of what information has been shared with whom and when);
- Keep detailed records about children/young people (including the names of allocated social workers and virtual school's Headteachers from relevant authorities) where appropriate and ensure that confidential files about children and young people are kept securely and that they are up-to-date;
- Ensure that safeguarding and child protection records are stored securely in a central place, separate from other academic records;
- Ensure that access to safeguarding and child protection records by staff, other than by the Designated and Deputy Designated Safeguarding Leads, is restricted;
- Ensure that general communication with parents and carers is in line with the relevant policies and gives due regard to which adults have parental responsibility;
- Ensure that parents and carers are aware, where appropriate, of information held on their child(ren) and that they are kept up to date regarding any concerns or developments by the appropriate members of staff;
- Ensure that, when a child or young person moves from the school, child protection records are forwarded on to the Designated Safeguarding Lead at the new school by secure means, with due regard to their confidential nature and in line with current government guidance on the transfer of such records; records (sent separately to a child or young person's main pupil file), detailing confirmation of receipt and showing where the documentation has gone, to whom they have been passed and the date they were transferred, will be kept (*note: if sending confidential records by post, these will be sent by 'Special/Recorded Delivery'; details of the*

*child's name, date of birth, where and to whom the records have been sent and the date the records were received will be kept);*

- Ensure that, if a child or young person is permanently excluded and moves to a Pupil Referral Unit, child protection records are forwarded on to the relevant organisation;
- Ensure that safeguarding and child protection records are archived according to current legislation and guidance;
- With the help of other staff with related roles and responsibilities, ensure the Academy's Single Central Record is accurate and up-to-date;
- Report appropriate information about child protection and safeguarding to the Academy Governing Board at least termly.

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained Deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the Designated Safeguarding Lead. This responsibility should not be delegated.

## **The Role of Staff**

Everyone who comes into contact with children, young people and their families has a role to play in safeguarding. The staff team in each of the Partnership schools takes this role very seriously as they understand that they are in a position to identify concerns early and provide help for children and young people, to prevent concerns from escalating. They must also understand that safeguarding and promoting the welfare of children is **everyone's** responsibility.

Executive Headteachers/Headteachers/Heads of School will:

- Ensure that Trust wide policies and procedures pertaining to safeguarding and child protection are adopted and consistently implemented;
- Be ultimately responsible for coordinating all child protection activity within their schools;
- Speak out where safeguarding issues arise;
- Address safeguarding issues internally, engaging in a multi-agency response when required (in accordance with interagency procedures);
- Ensure new safeguarding partners and child death review partner arrangements are in place
- Understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures; they should also be prepared to supply information as requested by the three safeguarding partners;
- Ensure arrangements are in place that set out clearly the principles for sharing information within the school and with the three safeguarding partners, other organisations, agencies and practitioners as required.
- Ensure the children are taught about how to keep themselves and others safe; teaching will include a focus on online safety, health and relationships (teaching must have regard the statutory guidance Relationships and sex education (RSE) and health education - GOV.UK [www.gov.uk](http://www.gov.uk))

*Note: it should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.*

All members of staff will:

- Contribute to and help to shape safeguarding arrangements and child protection policies;
- Provide a safe environment in which children and young people can learn;

- Listen carefully to the views of children and young people;
- Ensure that their approach is child-centred;
- Act at all times in the best interests of the child or young person, whether they are in school or learning remotely, with regards to matters that pertain to safeguarding;
- Not promise confidentiality to a child or young person if they are potentially going to make a disclosure;
- Read and adhere to consistently all of the school policies and procedures related to safeguarding;
- Maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Ensure that they are aware of the signs of abuse so that they are able to identify cases of children and young people who may be in need of help or protection;
- Ensure that they know what to do if they are concerned about a child or young person's welfare in any way;
- Ensure that they understand the role of the Designated Safeguarding Lead;
- Identify children and young people who may be in need of extra help and/or support (including in relation to their mental health or those children who have a Social Worker) and report this to the Designated Safeguarding Lead; also, offer help and/or support to the child or young person as deemed appropriate and as agreed with the Designated Safeguarding Lead;
- Be involved in the development, implementation and review of any safeguarding related assessments and plans, such as those required when seeking help and support through the Early Help, Child in Need and Child Protection channels;
- Identify children who are suffering, or are likely to suffer, significant harm; then take appropriate action i.e. refer the information to the Designated Safeguarding Lead **IMMEDIATELY** (in the absence of the Designated Safeguarding Lead, information will be shared with the Deputy Designated Safeguarding Lead), recording all of the concerns raised on the relevant reporting form or reporting system;
- Raise any safeguarding and/or welfare concerns immediately with the Designated Safeguarding Lead in order that s/he can take appropriate action; this includes situations of abuse which may involve staff members (*note: in exceptional circumstances, where a member of staff feels they have an urgent or genuine concern and that appropriate action has not been taken by the Designated and/or Deputy Designated Safeguarding Leads, staff members can speak directly to Children's Social Care*);
- Work with other services and organisations, as needed, in order to help, support and safeguard children and young people;
- Seek advice from the Academy's Designated Safeguarding Lead, the Local Safeguarding Children's Board (LSCB) or Social Care if this would benefit or protect a child or young person;
- Be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989, especially section 17 (Children in Need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments;
- Take the appropriate action (i.e. inform the Designated Safeguarding Lead) if it is thought that a child is 'missing' from school, as this is a potential indicator of abuse or neglect;
- Ensure that, as more children and young people work online, that all necessary steps are taken to safeguard them from potentially harmful and inappropriate online material (for further details see *Keeping children safe in education – Statutory guidance for schools and colleges* (September 2022) Annex D: Online safety);
- Ensure that children are taught about safeguarding, including online safety (schools should consider this as part of providing a broad and balanced curriculum and remember that Relationships Education and Health Education have been mandatory since September 2020)

## Staff Training

Training plans will be put into place by schools across the Trust to ensure that all staff have the appropriate training, skills and knowledge to undertake their safeguarding responsibilities safely and effectively. All staff will receive update training annually as a minimum, with appropriate safeguarding children training every three years (minimum). Key staff who have designated responsibilities for safeguarding, will undertake higher level training delivered by recognised organisations at regular intervals. In addition, the Trust's Designated Safeguarding Leads will attend appropriate designated safeguarding lead training every two years, with further courses in order to keep up to date with local and national initiatives; they (or a suitable nominated person) will also be trained to lead Prevent awareness training locally with staff.

## Staff Induction

This Child Protection Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the whole school staff and volunteers. All staff should be aware of systems within their school which support safeguarding and these should be explained to new staff as part of their initial induction when their employment first begins. During their first induction meeting, each member of staff will receive, as a minimum:

- A copy of their school's Behaviour Policy which should include measures to prevent bullying, with details about cyber-bullying, prejudice-based bullying and discriminatory bullying
- Part 1 of the Keeping children safe in education – Statutory guidance for schools and colleges (September 2022) – note: Annex A is a condensed version of Part 1 of the KCSiE and can be provided, instead of Part 1, to those staff who do not directly work with children
- This Child Protection Policy, detailing information about:
  - The Designated Safeguarding Lead(s) (including the identities of the DSL and DDSLs)
  - The safeguarding response to children who go missing from education
  - Procedures to deal with child-on-child abuse
  - How staff should use effective communication build trusted relationships with children and young people
- Employee Code of Conduct, which should include information about, amongst other things:
  - Low-level concerns
  - Allegations against staff
  - Whistleblowing
  - Acceptable use of technologies
  - Staff/pupil relationships
  - Communication, including the use of social media

Additionally, all visitors and volunteers to the Trust schools will be provided with information about child protection and safeguarding.

## **Staff Support**

All members of the Agora Learning Partnership recognise the stressful and traumatic nature of safeguarding and child protection work. As such, support for staff is offered as required; staff are given an opportunity to talk through their concerns and anxieties with the Designated Safeguarding Lead and to seek further support as and when it is needed.

#### 4. THE MANAGEMENT OF SAFEGUARDING

NAME OF THE AGORA LEARNING PARTNERSHIP'S TRUSTEE WITH RESPONSIBILITY FOR SAFEGUARDING: Bonnie O'Dell

NAME OF THE AGORA LEARNING PARTNERSHIP'S CENTRAL TEAM MEMBER WITH RESPONSIBILITY FOR SAFEGUARDING: Rebecca Daulman (CEO)

NAME OF THE GOVERNOR WITH RESPONSIBILITY FOR SAFEGUARDING AT (NAME OF SCHOOL): \*\*\* [\[Please see policy on school website for information\]](#)

#### The Role of Trustees

The Trustees will:

- Take the overall responsibility for the leadership of safeguarding arrangements across the Trust schools and promote a Trust-wide approach to safeguarding which places safeguarding and child protection at the forefront of all aspects of the Trust's work, whilst underpinning relevant policies and practises;
- Ensure all systems, processes and policies relating to safeguarding and child protection act in the best interests of the children they are working to protect;
- Ensure all safeguarding policies and procedures are transparent, clear and easy to understand Ensure that all schools within the Agora Learning Partnership comply with child protection related legislation;
- Monitor academy compliance at each academy within the Trust, through an annual safeguarding audit, a report to Trustees by each Academy Governing Body and through staff performance measures;
- Ensure that overarching policies relating to child protection and safeguarding are provided to all Trust schools but that all schools tailor these policies to reflect local circumstances;
- Ensure that the required safeguarding practices are consistent across the Trust, including those relating to child protection, anti-radicalisation, safer recruitment, staff conduct and e-safety;
- Have regard for the Department for Education's latest guidance (statutory and non-statutory) for schools and colleges, ensuring that Trust wide policies, procedures and training are effective and compliant in light of these;
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty, with which compliance is a legal requirement) and their local multi-agency safeguarding arrangements;

Notes:

- Trustees need to be aware that, in accordance with the Equality Act, schools must not unlawfully discriminate against children and young people in relation to any of the protected characteristics, such as their sex, race, disabilities or religion; in fact, Trustees must consider how they are supporting children and young people, Trust-wide, with regards to the protected characteristics
- The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific



consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. Ensure that Disclosure and Barring Service checks are carried out on all Members and Trustees

- Organise safeguarding training for Trust Board members and members of the Academy Governing Boards (including as part of Member and Trustee induction) so they are equipped to provide Trust leaders with strategic challenge to check the effectiveness of safeguarding policies and practises Trust-wide (note: training should be regularly updated);

### **The Role of the Designated Trustee for Safeguarding**

The Designated Trustee for Safeguarding will:

- Offer strategic support to the Designated Governors for Safeguarding in the Partnership schools;
- Ensure that the role and responsibilities of the Trust Board, in relation to child protection, are fulfilled;
- Ensure that the Members and Trustees are checked by the Disclosure and Barring Service (DBS).

### **The Role of the Central Team Member with responsibility for Safeguarding**

The Central Team Member with responsibility for Safeguarding will:

- Monitor the provision at the Trust related to child protection by meeting with the Designated and/or the Deputy Designated Safeguarding Leads during the school year, feeding back any findings to the Trust Board where appropriate
- Sharing post incident reviews and action points to improve practice with relevant parties, including Trustees, school leaders and Designated and/or the Deputy Designated Safeguarding Leads.
- Provide the Board of Trustees with an annual report detailing key safeguarding concerns that have arisen, issues flagged following post incident reviews and audits, emerging safeguarding issues and training needs;
- Ensure that the role and responsibilities of the Partnership schools, in relation to child protection, are fulfilled
- Commission external challenge and support (where appropriate) to ensure academies meet their statutory responsibilities in respect of safeguarding and promoting the welfare of children
- Ensure that the Partnership school's staff are checked by the Disclosure and Barring Service (DBS);
- Periodically check the academies' websites and Single Central Records to ensure compliance in relation to safeguarding requirements;
- Work with the headteachers of the academies to ensure that the performance of vulnerable children is effectively monitored and that appropriate support is made available to those children who are at risk of achieving poor outcomes;
- Ensure the Trust-wide Child Protection Policy is updated at least annually, approved with Trustees and shared appropriately with relevant parties across the Trust
- Liaise with local authority lead professionals for safeguarding, the HSCB, Ofsted, ESFA and other agencies as required.

## The Role of Governors on the Academy Governing Boards

The Governors will:

- Ensure that the children and young people in their schools are able to express their wishes and feelings and provide feedback;
- Ensure that their Academy complies with child protection related legislation;
- Ensure that the overarching policies relating to child protection and safeguarding, that are provided by the Trust, are tailored to reflect the school's local circumstances;
- Ensure that the required safeguarding policies and practices are in place and are consistent in the school, including those relating to child protection (such as those detailed within this policy), anti-radicalisation, staff conduct and e-safety; these will be reviewed by the Board at least annually;
- Ensure that 'safer recruitment' policies and procedures are implemented in order to prevent those who pose a risk to children and young people being able to work with them;
- Prioritise the welfare of children and young people and create a culture where staff are confident to challenge senior leaders over any safeguarding concerns
- Have regard for the Department for Education's latest guidance (statutory and non-statutory) for schools and colleges to ensure that the Academy's policies, procedures and training are effective and compliant in light of these;
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty, with which compliance is a legal requirement) and their local multi-agency safeguarding arrangements

Note:

- Governors need to be aware that, in accordance with the Equality Act, schools must not unlawfully discriminate against children and young people in relation to any of the protected characteristics, such as their sex, race, disabilities or religion; in fact, Governors must consider how they are supporting children and young people, school-wide, with regards to the protected characteristics
- The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.
- Ensure that the Academy contributes to interagency working in line with guidance from the Department for Education;
- Ensure that the Academy provides help and support to children, young people and families where needed;
- Ensure that the role and responsibilities related to the role of the Designated and Deputy Designated Safeguarding Leads are detailed in the relevant job descriptions and that these staff are also members of the Senior Leadership Team;
- Ensure that all members of staff with safeguarding roles have (as a result of appropriate training) the skills, knowledge and expertise to carry out their responsibilities effectively;
- Ensure that the relevant members of staff have the required time, funding, training, resources and support to carry out the roles of the Designated and Deputy Designated Safeguarding Lead to a high standard, especially with regards to providing advice and support to other staff on child welfare and child protection matters, taking part in strategy discussions and inter-agency

meetings (and/or to support other staff to do so) and to contribute to the assessment of children and young people;

- Ensure that all staff regularly attend appropriate training relevant to their safeguarding roles and responsibilities;
- Attend safeguarding training (including as part of the induction process) so they are equipped to provide school leaders with strategic challenge to check the effectiveness of safeguarding policies and practises school-wide (note: training should be regularly updated);
- Work to remedy any school deficiencies and weaknesses related to safeguarding and child protection without delay.

## **The Role of the Designated Governor for Safeguarding**

The Designated Governor for Safeguarding will:

- Offer strategic (rather than operational) support to the Designated and Deputy Designated Safeguarding Leads;
- Monitor the provision related to child protection (for example, by checking that child protection files are appropriately maintained, ensuring effective 'safer recruitment' practises are in place consistently, checking that more than one emergency contact number is held for every child at the school and ensuring staff appointed to safeguarding roles are suitable and these responsibilities are detailed in their job descriptions) at their school by meeting with the Designated and/or the Deputy Designated Safeguarding Leads during the school year
- Feed back any findings from in-school monitoring to the Academy Governing Board where this is deemed appropriate;
- Ensure that the role and responsibilities of the Academy Governing Board, in relation to child protection, are fulfilled
- Ensure that their school's Governors are checked by the Disclosure and Barring Service (DBS) where these Governors participate in regulated activity with children and/or young people;
- Periodically check their school's website and its Single Central Record to ensure compliance in relation to safeguarding requirements.

## 5. WHEN TO BE CONCERNED

All staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

### Physical abuse

A form of abuse which 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.

#### Indicators in a Child/Young Person

Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size	Aggression towards others, emotional and behaviour problems
Burns and Scalds – shape, definition, size, depth, scars	
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injuries	Fabricated or induced illness

### Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development:

- It 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.
- It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability,
- It may involve over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another.
- It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### Indicators in a Child/Young Person

Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a ‘loner’ Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour

### Neglect

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, for example, 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); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

### Indicators in a Child/Young Person

Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships

### Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include 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. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children (also known as peer-on-peer abuse) is a specific safeguarding issue in education and all staff should be aware of it and of the school’s policies and procedures for dealing with it.

Indicators in a Child/Young Person	
Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Poor attention / concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in school work habits, become truant
Sexually exploited or indiscriminate choice of sexual partners	

If staff have any concerns about a child's welfare, they should act on them immediately. If staff have a concern, they should follow this policy and speak to the DSL/DDSL. The DSL/DDSL are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to a safeguarding concern.

**Any staff member should be able to make a Child Protection Contact Referral to Children's Services if necessary.**

All staff should be aware of the process for making Child Protection Contact Referrals to Children's Services for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm - from abuse or neglect) that may follow a Contact Referral, along with the role they might be expected to play in such assessments.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

**Options will then include:**

- managing any support for the child internally via the school or college's own pastoral support processes;
- completing a Families First Assessment or a Request for Support referral;
- a Child Protection Contact Referral for statutory services, for example as the child might be in need of support from services or suffering or likely to suffer significant harm from abuse or neglect.

**Extra Familial Harm (formerly Contextual Safeguarding)**

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the DSLs and their Deputies should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of

children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

### **A child centred and coordinated approach to safeguarding**

Safeguarding and promoting the welfare of children is **everyone's responsibility**. In order to fulfil this responsibility effectively, each professional should make sure their approach is **child centred**. This means that they should consider, at all times, what is in the best interests of the child.

Schools and colleges and their staff form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the **best interests** of the child at all times.

### **Children who may require early help (known as Families First in Hertfordshire)**

Families First is Hertfordshire's strategy for early help for families. A directory of early help services is available at [www.hertfordshire.gov.uk/familiesfirst](http://www.hertfordshire.gov.uk/familiesfirst) which will help practitioners and families find information and support to prevent escalation of needs and crisis.

All staff should be aware of the **early help process**, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL any ongoing/escalation of concerns so that consideration can be given to a Child Protection Contact Referral to Children's Services if the child's situation doesn't appear to be improving.

If early help is appropriate, the DSL or a Deputy will generally lead on liaising with other agencies and setting up a Families First Assessment as appropriate.

### **Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:**

1. is disabled or has certain health conditions and has specific additional need
2. has special educational needs (whether or not they have a statutory education, health and care plan);
3. has a mental health need;
4. is a young carer;
5. 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;
6. is frequently missing/goes missing from care or from home;
7. is at risk of modern slavery, trafficking or exploitation;
8. is at risk of being radicalised or exploited;
9. has a family member in prison, or is affected by parental offending;
10. is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;



11. is misusing alcohol and other drugs themselves;
12. has returned home to their family from care;
13. is at risk of 'honour'-based abuse, such as female genital mutilation or forced marriage;
14. is a privately fostered child;
15. is persistently absent from education, including persistent absence for part of the school day;

School staff members should be aware of the main categories of maltreatment: **physical abuse, emotional abuse, sexual abuse and neglect** as well as being aware of the indicators of maltreatment and **specific safeguarding issues** so that they are able to identify cases of children who may be in need of help or protection.

### **Children with special educational needs and/or disabilities (SEND):**

Children with special educational needs and disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's impairment without further exploration;
- That these children are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours, such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges;
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

### **Child-on-Child Abuse**

All staff should be aware that children can abuse other children and that it can happen both inside and outside of school, as well as online. All staff must take the approach that child-on-child abuse 'could happen here'; they should be clear that they are responsible for preventing child-on-child abuse and responding appropriately when they believe a child may be at risk from it. It is important that staff report all concerns regarding child-on-child abuse to their DSL (or DDSL).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature; some of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" 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.

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 (sometimes known as '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 stand-alone 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 engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude 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;
- 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).

To minimise the risk of child-on-child abuse, each school in the Trust will work to:

- Provide a developmentally appropriate PSHE and RSE curriculum which develops pupils' understanding of acceptable behaviour and ways to keep themselves safe;
- Have systems in place for children to raise concerns with staff, in the knowledge they will be listened to, believed and valued;
- Ensure victims, perpetrators and any other child affected by child-on-child abuse are supported;
- Develop robust risk assessments where appropriate;
- Have relevant policies in place (e.g. behaviour policy).

### **Child-on-Child Sexual Violence and Sexual Harassment**

When responding to concerns relating to child-on-child sexual violence or harassment, staff will need to follow the guidance outlined in Part five of KCSIE 2022.

All staff must recognise that sexual violence and sexual abuse can happen anywhere and maintain an attitude of 'it could happen here.' Staff must also recognise that sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). **Sexual violence and sexual harassment is never acceptable.**

If an incident of sexual violence or sexual harassment occurs, victims must be reassured by school staff that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report, even if the abuse occurred online or outside of the school; such reports must be treated equally seriously and in line with relevant policies and procedures.

When a child reports that they have been abused, school staff must:

- Recognise that the law is in place to protect children and young people rather than criminalise them and that this must be explained in such a way to children that avoids alarming or distressing them;
- Recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident
- Understand that trauma can impact memory, so children may not be able to recall all details or timeline of abuse
- Understand that some children may face additional barriers to telling someone; for example because of their vulnerability, disability, sex, ethnicity and/or sexual orientation

- Immediately make a report to the DSL (or DDSL), as they are likely to have a complete safeguarding picture about the children concerned

After receiving a report detailing information pertaining to child-on-child sexual violence and/or sexual harassment, the DSL will make an immediate risk and needs assessment which explores how best to support and protect:

- The victim;
- The alleged perpetrator;
- Any other children involved/impacted (in line with part five of KCSIE 2022).

The risk and needs assessment will be recorded and kept under review and will consider any actions that are required to protect and support:

- The victim;
- The alleged perpetrator;
- All other children and staff.

Reports will initially be managed internally by the DSL (or DDSL) and, where appropriate, be referred to Children's Services and/or the Police. Important considerations which may influence this decision include:

- The wishes of the victim in terms of how they want to proceed;
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children;
- If the alleged incident is a one-off or a sustained pattern of abuse (*note: sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature*);
- That sexual violence and sexual harassment can take place within intimate personal relationships between children;
- Understanding intra familial harms and any necessary support for siblings following incidents;
- Whether there are any ongoing risks to the victim, other children or adults in the school;
- Any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The DSL (or DDSL) will, in most instances, engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, including in relation to confidentiality and data protection, and (where appropriate) will be subject to discussion with other agencies (for example Children's Services and/or the Police) to ensure a consistent approach is taken.

## Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or significant change in well-being
- Signs of assault or unexplained injuries
- Unexplained gifts/new possessions

Also refer to **Schools Toolkit** the characteristics of young peoples' vulnerability to CSE and CCE on the HGFL; <https://thegrid.org.uk/safeguarding-and-child-protection/child-protection/specific-safeguarding-issues/child-sexual-and-criminal-exploitation>

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

## Mental Health

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the procedures in this policy and speaking to the schools DSL.

## ***PREVENT: Safeguarding Children and Young People from Radicalisation***

Children can be vulnerable to extreme ideologies and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from radicalisation must be part of all school and college safeguarding approaches.

All schools and colleges are subject to the Prevent Duty under Section 26 of the Counter Terrorism

and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have “due regard to the need to prevent people from being drawn into terrorism.” KCSiE DfE 2022, page 149

There are signs and vulnerability factors that may indicate a child is susceptible to radicalisation or is in the process of being radicalised. It is possible to protect vulnerable people from extremist thinking and intervene to safeguard those at risk of radicalisation. Staff must be alert to changes in children’s behaviour, which could indicate that they may be in need of Prevent support. They must act proportionately to the concern using the Prevent ‘notice, check, share’ approach, which may lead to the DSL making a Prevent referral or, if there is an immediate threat, the Police will be contacted via 999.

Local Hertfordshire County Council guidance on Prevent is featured at 5.3.9 of the Hertfordshire Safeguarding Children’s Partnership CP procedures:

[https://hertsscb.proceduresonline.com/chapters/p\\_prevent\\_guide.html](https://hertsscb.proceduresonline.com/chapters/p_prevent_guide.html)

## **Domestic Abuse**

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

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. See Appendix 4 for information regarding Operation Encompass.

## **6. DEALING WITH A DISCLOSURE**

If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child in a manner appropriate to the child’s age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.

If a child discloses that he or she has been abused in some way, the member of staff/volunteer should:

- 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, but not make promises which might not be possible to keep

- Never promise a child that they will not tell anyone – as this may ultimately not be in the best interests of the child
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify what is being said
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping)
- Pass the information to the DSL without delay (if a DSL or Deputy is not available, staff must inform a senior member of staff or complete a child protection contact referral if this disclosure indicates that the child may be at risk of immediate harm and/or have been suffered significant harm to ensure reporting to Police and/or Children's Services where necessary is not delayed)

### **Third Party Disclosures**

It is everyone's responsibility to report concerns related to children and make referrals to Children Services and the Police if suspected that a child has been abused or is at risk of abuse. Therefore, when safeguarding concerns are shared with the DSL in a school by a parent or member of the public, it is important to note that there is equal responsibility by the complainant to report the matter directly rather than assume the responsibility is that of the school. If unsure of how to do this, the complainant should speak to the DSL or Head of School/Headteacher/Executive Headteacher who will advise accordingly.

### **Support**

Dealing with a disclosure from a child, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the DSL.

**If a school /college staff member receives a disclosure about potential harm caused by another staff member, they should see section 12 of this policy – *Safeguarding Concerns or Allegations made about a Member of Staff*.**

## **7. RECORD KEEPING**

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the UK GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the DSL.

- Record as soon as possible after the conversation

- Use the school's child protection recording system which may be electronic or using a record of concern sheet (pro-forma available on the Hertfordshire Grid for Learning – HGFL)
- Ensure the date, time and place is recorded, and any noticeable non-verbal behaviour and the words used by the child
- Use the body map on the schools recording system or the pro forma body map available on HGFL, to indicate the position of any injuries and a clear description of the injury
- Record statements and observations rather than interpretations or assumptions
- Do not destroy the original records in case they are needed by a court
- All records need to be given to the DSL promptly; no copies should be retained by the member of staff or volunteer.

The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

Safeguarding records information can be found on the Herts Grid:

<https://thegrid.org.uk/safeguarding-and-child-protection/child-protection/safeguarding-records>

## 8. INFORMATION SHARING

As part of meeting a child's needs, it is important to recognise the importance of information sharing with relevant parties.

All Trust schools should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to children's social care.

However, the Trust schools must have due regards for the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

All staff dealing with matters pertaining to child protection and safeguarding must continue to have due regard to the relevant data protection principles which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'
- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data; this includes allowing staff to share information without consent where there is good reason to do so and when the sharing of information will enhance the safeguarding of a child in a timely manner – it would be legitimate to share information without consent where:
  - It is not possible to gain consent
  - It cannot be reasonably expected that a practitioner gains consent
  - To gain consent would place a child at risk



- Not providing pupils' personal data where the serious harm test under the legislation is met – where in doubt, schools should seek independent legal advice

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

When a child leaves one of the Trust schools, the Designated Safeguarding Lead should ensure their child protection file is transferred to the child's new school as soon as possible and within five days for an in-year transfer or within the first 5 days of the start of a new term, to allow the new school to have support in place for when the child arrives. The Designated Safeguarding Lead should ensure secure transit and confirmation of receipt should be obtained. Child protection files should be transferred separately from the main pupil file. Receiving schools should ensure key staff, such as Designated Safeguarding Leads and Special Educational Needs and Disabilities Co-ordinators (SENCO's), are aware as required.

In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, the Designated Safeguarding Lead could share information that would allow the new school to put support in place for:

- Children who have had a social worker and have been victims of abuse;
- Children receiving support through the 'Channel' programme.

## 9. CONFIDENTIALITY

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools.

- All staff in schools, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies.
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

## 10. SCHOOL PROCEDURES

***Please see Appendix 3: KCSiE 2022 (page 22)***

If any member of staff is concerned about a child, he or she must inform the DSL. The DSL will decide whether the concerns should be raised to Children's Services and if deemed to have met the threshold a Child Protection Contact Referral will be completed. If a Child Protection Contact Referral to Children's Services is made the DSL will discuss the referral with the parents, unless to do so would place the child at further risk of harm.

While it is the DSL's role to make Child Protection Contact Referrals, any staff member can make a Child Protection Contact Referral to Children's Services if a child is in immediate danger or is at risk

of harm (e.g., concern that a family might have plans to carry out FGM, Forced Marriage etc). In these circumstances a Child Protection Contact Referral should be made to Children's Services and/or the Police immediately. Where Child Protection Contact Referrals are made by another member of staff, the DSL should be informed as soon as possible.

If a **teacher** (persons employed or engaged to carry out teaching work at schools and other institutions in England), in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police via 101. **This is a mandatory reporting duty** KCSiE (DfE 2022 pages 153-154).

If the allegations raised are against other children, the school should follow section 5.1.17 of the Hertfordshire Safeguarding Children Partnership Procedures Manual – Children Who Abuse Others. Please see pages 23 – 25 of this policy for more details on procedures to minimise the risk of child-on-child abuse.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise and a factual account of any verbal disclosures and observations (record of concern pro-forma is available on the Hertfordshire Grid for Learning).

Particular attention should be paid to the attendance and development of any child about whom the school has concerns, or who has been identified as being the subject of a Child Protection Plan and a written record will be kept.

If a pupil who is/or has been the subject of a child protection plan changes school, the DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving school, in a secure manner, and separate from the child's academic file.

The DSL is responsible for making the senior leadership team aware of trends in behaviour that may affect pupil welfare. If necessary, training will be arranged.

## 11. COMMUNICATION WITH PARENTS

<Name of school> will ensure this Child Protection Policy is available publicly either via the school website or by other means.

Parents should be informed prior to a Child Protection Contact Referral, unless it is considered to do so might place the child at increased risk of significant harm by:

- The behavioural response it prompts e.g. a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed;
- Leading to an unreasonable delay;
- Leading to the risk of loss of evidential material;

(The school may also consider not informing parent(s) where this would place a member of staff at risk).

The school will endeavour to ensure that parents understand the responsibilities placed on the school staff for safeguarding children.

Where reasonably possible schools and colleges should hold more than one emergency contact number for each pupil and student (KCSiE DfE 2022, page 28).

Further guidance around information sharing can be located within; Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, 2018): <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

## **12. SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT A MEMBER OF STAFF**

In all the Trust schools, procedures must be in place to manage safeguarding concerns/allegations involving staff (including supply staff, contractors and volunteers).

School leaders must ensure procedures are in place for staff to report concerns/allegations:

- No matter how small
- That may be deemed 'low level'
- That may or may not meet the harm threshold

**A safeguarding concern/allegation is any information which indicates that a member of staff/volunteer may have:**

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

This relates to members of staff, supply staff, contractors and volunteers who are currently working in any one of the Trust schools regardless of whether the school is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the Police. Historical allegations of abuse should also be referred to the police.

**What staff should do if they have concerns about another member of staff (including supply staff, contractors and volunteers) who may pose a risk of harm to children allegations against a professional:**

- If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, contractors or volunteers) posing a risk of harm to children, this is to be referred to the Executive Headteacher/Headteacher. This includes allegations reported or made by a child, parent or member of the public.

- Where the Executive Headteacher/Headteacher is the subject of an allegation, this is to be referred to the chair of the Academy Governing Board, who should discuss the allegation immediately with the Chief Executive Officer at the Agora Learning Partnership and the Local Authority Designated Officer(s) LADO.

Staff may also consider discussing any concerns with the designated senior lead (DSL) for safeguarding and if appropriate make any referral via them.

The Chair of the Academy Governing Board in this school is:

NAME/CONTACT NUMBER:

\_\_\_\_\_/\_\_\_\_\_

In the absence of the Chair of the Academy Governing Board, the Vice Chair should be contacted. The Vice Chair in this school is:

NAME/CONTACT NUMBER:

\_\_\_\_\_/\_\_\_\_\_

The Chief Executive Officer in the Agora Learning Partnership is:

NAME/CONTACT NUMBER:

Rebecca Daulman/01923 589418

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he must contact the Chief Executive Officer at the Agora Learning Partnership immediately. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Headteacher or Executive Headteacher/Chair or Vice Chair.

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Executive Headteacher/Headteacher/Chair of the Academy Governing Board will not investigate the allegation itself, or take written or detailed statements, but will assess (having discussed the matter with the Chief Executive Officer) whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO Threshold Guidance may be used to inform this decision – found at [https://hertsscb.proceduresonline.com/chapters/p\\_manage\\_alleg.html](https://hertsscb.proceduresonline.com/chapters/p_manage_alleg.html)

Children's Services – 0300 1234043

SOOHS (Out of Hours Service-Children's Services) – 0300 1234043

If the allegation meets any of the four criteria set out at the start of this section, contact should always be made with the Local Authority Designated Officer without delay and within twenty-four hours.

If it is decided that the allegation requires a child protection strategy meeting or joint evaluation meeting, this will take place in accordance with section 5.1.5 of the Hertfordshire Safeguarding Children Partnership Procedures Manual.

If it is decided it does not require a child protection strategy meeting or joint evaluation meeting, the LADO will provide the employer with advice and support on how the allegations should be managed.

The Headteacher/Chair of the Academy Governing Board should, as soon as possible, **following briefing** from the Local Authority Designated Officer inform the subject of the allegation.

*Note:*

- *There must be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.*
- *Where a teacher's employer, including an agency, dismisses or ceases to use the 39 Section 35 of the Safeguarding Vulnerable Groups Act 2006. 40 Section 38 of the Safeguarding Vulnerable Groups Act 2006. 39 services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on Gov.uk*

### **Concerns that do not meet the 'Harm Threshold'**

School leaders within each of the Trust schools will provide staff with advice and guidance about the actions that need to be taken should 'low-level' concerns about another member of members of staff arise. School leaders will make explicit to staff:

- What constitutes a low-level concern;
- The importance of sharing low-level concerns;
- The confidential procedure that needs to be followed, should a low-level concern need to be reported - it is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

## Low-level concerns should be shared confidentially with:

NAME/CONTACT NUMBER:

\_\_\_\_\_ / \_\_\_\_\_

Each of the Trust schools has an open and transparent culture in which all concerns about all adults working in or on behalf of the school of Trust can be dealt with promptly and appropriately; enabling school leaders to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school or Trust are clear about and act within appropriate professional boundaries, in accordance with our ethos and values.

A 'low-level' concern does not mean that it is insignificant; a low-level concern is:

- Any concern that an adult working in or on behalf of the school or Trust may have acted in a way that is inconsistent with the expectations set in relation to staff behaviour, including inappropriate conduct outside of work;
- A concern that does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO;
- Is a concern that may arise in several ways and from a number of sources - for example, suspicion, complaints, allegations made by a child, parent or other adult within or outside of the organisation or as a result of vetting checks

When low-level concerns are reported:

- The Executive Headteacher/Headteacher will be informed as they are ultimate decision maker in respect of the response to all low-level concerns;
- The employers of supply staff and contractors will be informed (where applicable) so any potential patterns of inappropriate behaviour can be identified;
- The LADO will be contacted if there is any doubt as to whether the information which has been shared about a member of staff, as a low-level concern, in fact meets the harm threshold;
- This will need to be in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified;
- Where a pattern is identified, appropriate action will be taken (for example, reviewing the LADO threshold and completing a referral if harm test met);
- Related records will remain confidential and will be held securely and retained, whilst complying with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures.

### For Further Information

- Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5 Managing Allegations Against Adults who work with Children and Young People

Where a staff member feels unable to raise an issue with their employer/through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- Children's Services 0300 123 4043
- NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday (email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk))

**What school or college staff should do if they have concerns about safeguarding practices within the school or college?**

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or education setting's safeguarding arrangements.
- Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the school's senior leadership team.

### Safer working practice

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook/school code of conduct/staff behaviour policy and Safer Recruitment Consortium document ***Guidance for safer working practice for those working with children and young people in education settings (February 2022)*** available at:

<https://www.saferrecruitmentconsortium.org/>

The document seeks to ensure that the responsibilities of school leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998). Please see the school's behaviour management policy for more information.

HSCP escalation and complaints procedure link:

[https://hertsscb.proceduresonline.com/chapters/p\\_resolution\\_disagree.html](https://hertsscb.proceduresonline.com/chapters/p_resolution_disagree.html)

### Key contacts at school name

Role	Name	Contact number	Email
Designated Safeguarding Lead			
Deputy Designated Safeguarding Lead (s)			
Headteacher/Executive Headteacher			
Trust Safeguarding Lead	Rebecca Daulman	01923 589418	Rebecca.Daulman@agoralearning.co.uk
Chair of Governors			
Vice Chair of Governors			
Safeguarding Trustee	Bonnie O'Dell	01923 589418	Bonnie.O'Dell@agoralearning.co.uk



**APPENDIX 1: Keeping Children Safe in Education (DfE 2022)**  
**Part One: Information for all school and college staff**  
**Annex A: Further information**

On publication of this Child Protection Policy, September 2022, the CPSLO Service has decided to provide the hyperlink only to KCSiE rather than the document in its entirety, due to the potential for updates to the content.

All staff that have direct working with children should have access and have read Part one OR Annex A and Annex B (which provides further information specific forms of abuse and safeguarding issues) of this statutory guidance. Those staff who do not work directly with children should read either Part one or Annex A (a condensed version of Part one) of this guidance. This is entirely a matter for the school or college and will be based on their assessment of which guidance will be most effective for their staff to safeguard and promote the welfare of children. All Staff should also have the opportunity to seek clarity from designated staff for any content. This is to assist staff to understand their role and discharge their responsibilities as set out in this guidance.

We highly recommend that staff are asked to sign to say they have read these sections (please see Appendix 2 below) and should subsequently be re-directed to these documents again should any changes occur.

Link to KCSiE (DfE, 2022):

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/106533/Keeping-children-safe-in-education-2022.pdf)

Annex F KCSiE (DfE 2022): Substantive changes from September 2022

## APPENDIX 2: DECLARATION FOR STAFF

### Child Protection Policy and KCSiE DfE 2022

Multi-Academy Trust: Agora Learning Partnership

School name: .....

Academic Year .....

Please sign and return to ..... (Designated Safeguarding Lead) by .....<insert date>.....

I, \_\_\_\_\_<insert name>\_\_\_\_\_ have read and am familiar with the contents of the following documents and understand my role and responsibilities as set out in these document(s).:

(1) The School/College's Child Protection Policy

(2) Part One OR Annex A (delete as appropriate) and Annex B of 'Keeping Children Safe in Education' DfE Guidance, 2022

<Please insert any other relevant documentation/guidance for your school/college>

I am aware that the Designated Safeguarding Lead(s) and Deputy Designated Safeguarding Lead(s) are:

.....  
.....  
.....  
.....

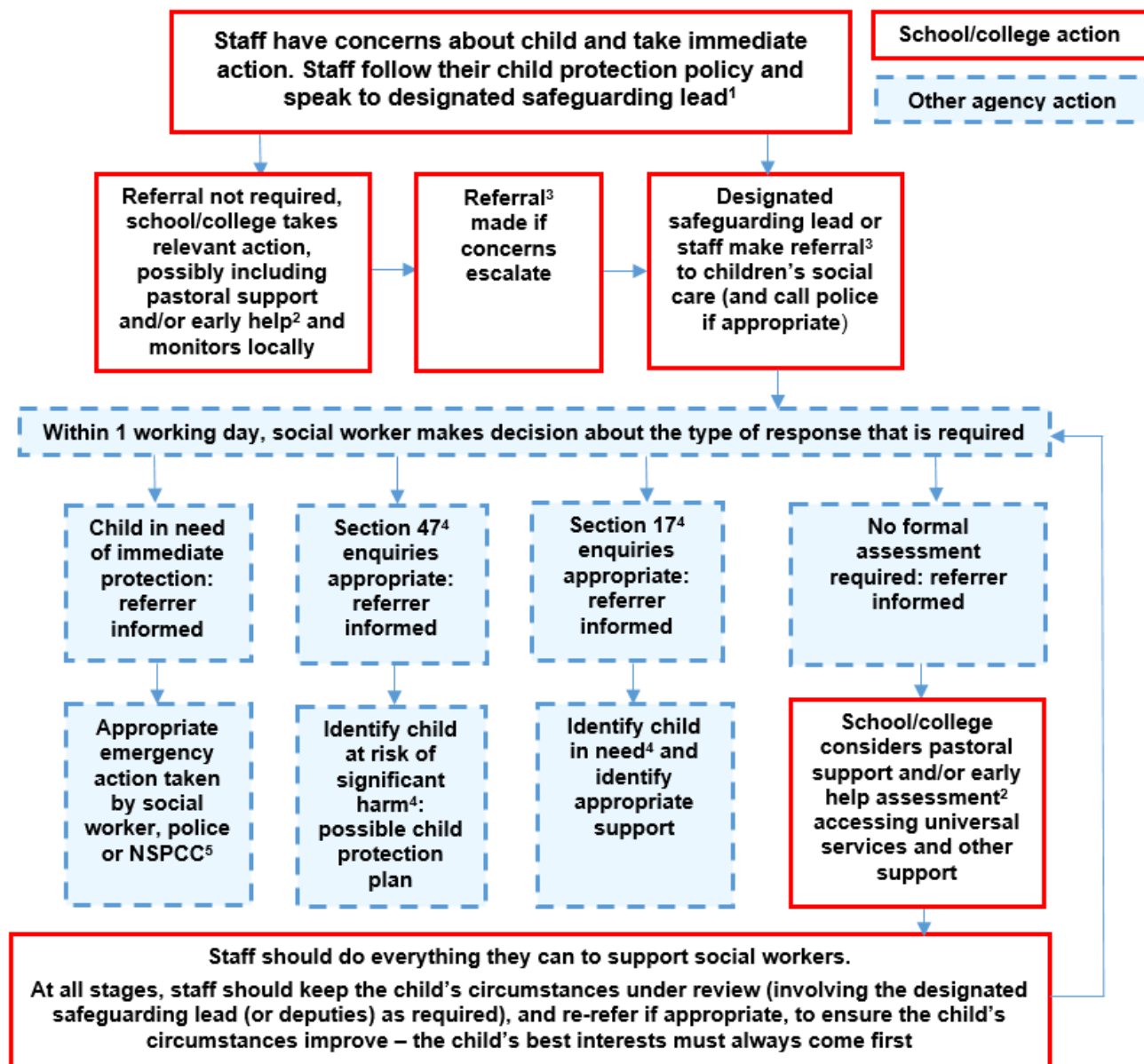
and I am able to discuss any concerns that I may have with them.

I know that further guidance, together with copies of the policies mentioned above, are available .....<insert location>.....

Signed \_\_\_\_\_ Date \_\_\_\_\_

## APPENDIX 3: ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

### Flowchart



Page 22 of KCSIE 2022

### The National Police Chiefs' Council- *When to call the police* guidance

This advice covers incidents on school and college premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police. This advice covers the following situations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences

- Theft
- Weapons

This advice aims to support schools and college to make defensible decisions when considering whether to involve the police. Further guidance can be found at:

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

## APPENDIX 4: OPERATION ENCOMPASS – Information sharing from Police regarding Domestic Abuse notifications (2<sup>nd</sup> December 2019)

### Operation Encompass Safeguarding Statement:

- Our school is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse.
- Operation Encompass means that the police will share information about Domestic Abuse incidents with our school PRIOR to the start of the next school day when they have been called to a domestic incident.
- Our parents are fully aware that we are an Operation Encompass school.
- The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.
- The Key Adult has also led training for all school staff and Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children. We have also discussed how we can support our children following the Operation Encompass notification.
- We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.
- The Designated Governor for Safeguarding will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.
- The Key Adult has used the Operation Encompass Toolkit to ensure that all appropriate actions have been taken by the school.

OUR KEY ADULTS ARE: .....

Key contacts at .....<school/ college/ academy name>.....

Role	Name	Contact number	Email
Designated Safeguarding Lead			
Deputy Designated Safeguarding Lead (s)			
Headteacher / Principal			
Trust Safeguarding CEO / Manager			
Chair of Governors			
Vice Chair of Governors			
Safeguarding Trustee			

### Children missing from education in accordance with setting attendance policy

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children missing education are children of compulsory school age who are not registered pupils at a school

and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, child sexual exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Department for Education guidance makes it clear that in carrying out this duty, local authorities must have in place arrangements for joint working and information sharing with other local authorities and partner agencies. It also states that all agencies which come into contact with children must cooperate with the local authority's arrangements for identifying children thought to be missing from education.

Separate guidance is available for schools on the Herts Grid for Learning about the legitimate removal of pupils from a school roll. A child legitimately removed from roll is not in most cases missing from education and all schools, including academies and independent schools are legally required to notify the local authority when they remove/plan to remove a child from their roll.

## **APPENDIX 5:**

### **Ofsted school Inspection Handbook September 2022**

This handbook is primarily a guide for inspectors on how to carry out school inspections. However, it is made available to schools and other organisations to ensure that they are informed about the processes and procedures of inspection. It seeks to balance the need for consistency in inspections with the flexibility required to respond to the individual circumstances of each school.

On publication of this Child Protection Policy, September 2022, the CPSLO Service has decided to provide the hyperlink only to the Ofsted School Inspection Handbook rather than the document in its entirety, due to the potential for updates to the content.

<https://www.gov.uk/government/publications/school-inspection-handbook-eif/schools-inspection-handbook-for-september-2022>

## **APPENDIX 6:**

### **Online Safety Guidance**

Hertfordshire Guidance:

[School online safety policy - Hertfordshire Grid for Learning \(thegrid.org.uk\)](https://www.hertfordshiregrid.org.uk/school-online-safety-policy)

## **APPENDIX 7:**

### **UK GDPR, data protection and Freedom of Information**

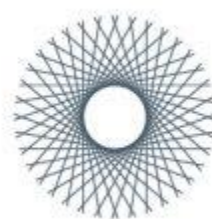
Schools can contact the Trust's DPO for advice, in addition to the Trust's legal providers  
[DPO@agoralearning.co.uk](mailto:DPO@agoralearning.co.uk)

Further information can be accessed at <https://ico.org.uk/for-organisations/>



# Child Protection Policy for the Agora Learning Partnership

*(Adopted from Hertfordshire County Council)*



AGORA  
LEARNING  
PARTNERSHIP

## APPENDIX 8:

### Guidance for carrying out an online search for shortlisted candidates

#### Background:

The statutory guidance, Keeping Children Safe in Education 2022, introduced a new paragraph relating to pre-employment screening. It states:

“In addition, as part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview”.

The following guidance sets out the factors and actions schools should consider in undertaking such searches.

#### 1. Key considerations:

- ‘should’ in statutory guidance, as used in the above quoted paragraph, means that you should do it unless you have a good reason not to; if you have a good reason not to, it is wise to have a written rationale for this. Advice must be sought from the HR Manager if this is the case.
- ‘should consider’ is not the same as ‘should undertake’ – in other words, you could consider doing online checks and decide they are not appropriate. However, it is difficult to think of many (if any) circumstances in which you might decide not to undertake the checks
- ‘online search’ is not the same as a search of candidates’ social media activity
- schools must only seek information which is publicly available online
- schools should only look for information related to the key purpose of the search i.e., to identify issues which may indicate that the person may be unsuitable to work with children (or to verify employment history in the case of business social media sites)

#### 2. Who does the check apply to:

- Shortlisted candidates, governors and trustees

### 3. Recorded information

Information recorded from an online search may be subject to data protection legislation and would need to be disclosed under a Subject Access Request. It is therefore essential that the information recorded is fair, factual and does not introduce personal bias or opinion.

### 4. The process

#### a) **Ensure you are transparent with applicants**

The Safer Recruitment and Selection Policy, Applicant Privacy Notice, application form and template letter have been updated to ensure that applicants are aware that on-line searches will be carried out. In addition, My New Term recruitment portal has also updated their application form to reflect that online searches will take place.

#### b) **Separate functions to avoid discrimination**

Best practice is to ask an appropriate and competent person who is not part of the selection panel to undertake the online searches in order to avoid the selection panel seeing irrelevant information which might influence them consciously or unconsciously.

A potential risk in undertaking online searches is discrimination. A recruiter who views an individual's online presence may see or assume information about their age, gender, race, religious or political views, sexual orientation or family circumstances, which are all irrelevant to the selection process. This may lead to unconscious bias i.e. making a judgement about the applicant, even unintentionally. This could risk an unsuccessful applicant claiming the decision amounted to discrimination – suggesting that the real reason they did not get the role is because they are from a particular ethnic group, age group etc.

The individual conducting the online search should be provided with a clear and focussed remit so that they are only identifying issues related to the stated purpose of the search (see Appendix 1A).

As the employer, the school will remain responsible for how the information received via the search is used and liable for any decisions made on the basis of the information.

#### c) **Conducting the on-line search**

Only information which is publicly available should be viewed. A simple search engine search is sufficient to identify any information which is readily available. All reasonable efforts should be made to ensure that the correct individual is identified. Schools should not ask the applicant or others who may know them for access to, or information about, their private online presence or accounts. We do not recommend asking applicants to provide their social media account addresses or details.

Candidates should not be treated differently in relation to whether or not they have any public online presence.

#### d) **Explore any concerns arising with the applicant**

Where areas of concern arise, the panel should discuss these with the applicant at interview, providing the opportunity for them to offer context and explanation. This also provides a double check that the information found does relate to the individual concerned.

If information has been discovered, this should be compared with the candidate's application form, employment history and criminal / suitability self-disclosure and then discussed with the

applicant at interview – the questions asked and responses provided by the applicant should be recorded on the interview notes.

Criminal information found via a search engine is still covered by the [filtering rules](#) – if the conviction / caution would be filtered, it should not be discussed with the candidate and cannot be taken into account. To check what convictions/cautions apply please refer to [DBS filtering guide](#).

If the information relates to a serious incident or demonstrates that the candidate has been dishonest in their application / self-disclosure, seek advice from the LADO and the Agora Learning Partnership HR Manager, by emailing [sally.knight@agoralearning.co.uk](mailto:sally.knight@agoralearning.co.uk) before discussing with the candidate at interview.

The panel will need to make a judgement on the basis of what they have seen and heard – similarly to how they would assess a positive DBS e.g., considering relevance, seriousness, timeline (i.e. recent matters or historic), explanation - ultimately whether they genuinely believe the matters indicate unsuitability to work with children. The panel should document their decisions.

**e) Destroy information**

Once the employment decision has been made, any documents (e.g., screen shots) gathered as part of the on-line search should be destroyed. Only the decision should be recorded as part of the interview notes and the information should not be recorded on the school's Single Central Record.

## Appendix 1A

### STRICTLY CONFIDENTIAL

Scope for online searches on shortlisted candidates

Candidate Name	
Post applied for	
Search conducted by	
Is this person independent to the shortlisting panel?	YES / NO
Date of search	

**DO NOT RECORD ANY INFORMATION RELATED TO INDIVIDUAL CHARACTERISTICS SUCH AS AGE, RACE, RELIGION, POLITICAL VIEWS, OR FAMILY CIRCUMSTANCES.**

Which search engine(s) was used to carry out the search e.g., Google	
Are there results from a search on the candidate's name?	YES / NO
<p>From the information available from the search is there any information which raises potential concerns about their suitability to work with children, for example:</p> <ul style="list-style-type: none"><li>• evidence of inappropriate or offensive behaviour (e.g., discrimination, derogatory language)</li><li>• drug or alcohol misuse</li><li>• indecent or offensive images/videos</li><li>• other similar matters</li></ul> <p>Provide details, evidence and timescale if possible (e.g., recent or historic).</p>	
What is the source of this information? (e.g., news article, document, website, social media etc.)	
What checks have you done to verify that your search has identified the applicant	

correctly (e.g., full name match, current employer match, DOB match)? (Indicate if there is uncertainty)	
If information is available – does their work history match the information the applicant provided? Detail any discrepancies or concerns	

**This information is to be passed only to the selection panel after shortlisting.**