Academy Policy

Safeguarding and Child Protection Policy (Draft)

CEO approval:	Sean Kelly	
LGB Cluster ratification	AP Cluster	
Last reviewed on:	September 2024	
Next review due by:	September 2025	

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1. Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Raleigh Education Trust	Sean Kelly – Chief Executive Officer	0115 855 0100
Unity Academy	Elizabeth Browne – Executive Principal	Elizabeth.Browne@unity.raleightrust.org
	Luke Sisson – DSL and Trust AP Lead	Luke.Sisson@unity.raleightrust.org
	Sarah Williams – Deputy DSL and Education Placement Manager	S.Williams@denewood.raleightrust.org
	Michelle Picker – Designated Teacher for child looked after, SENCO, Deputy DSL	M.Picker@denewood.raleightrust.org
	DSL trained-Education Placement Officers Charlotte Goonan Jane Balfe Anthony Beaumont	0115 9151271
Raleigh Education Trust Safeguarding Lead	Ki Addis	Ki.Addis@raleightrust.org
Local authority designated officer (LADO)	Claire Patel – claire.patel@nottinghamcity.gov.uk / LADO@nottinghamcity.gov.uk 01158764762	
Board of Trustees Chairperson	Eileen Hartley	0115 855 0100
Safeguarding Trustee	Emma Ogden	0115 8550100
Safeguarding Governor	Paul Burchett – Denewood & Unity	

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Channel helpline	020 7340 7264
Nottingham City Multi-Agency Safeguarding Hub (MASH)	0115 876 4800 or email: citymash@nottinghamcity.gov.uk
Local authority school education co-ordinator	0115 8764749 Claire.Maclean@nottinghamcity.gov.uk

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2. Context

2.1   All pupils at Unity Academy receive all their education offsite at a range of education providers. Unity Academy will only arrange placement for pupils at registered schools, independent schools and Nottingham City Council-approved alternative provisions. Throughout this policy, we use the term offsite education provider in reference to these settings. All offsite education providers have an up-to-date child protection and safeguarding policy, have a named DSL and have their safeguarding procedures quality assured by a member of Raleigh Education Trust quality assurance team. See Appendix 4 for the safeguarding checklist.

2.2   Where it is mentioned throughout this policy that staff will speak/contact a DSL. This must be considered in the context of how Unity Academy works with offsite education providers. For example, for our directly employed staff, their DSL to contact will be the named Unity Academy DSL, but for offsite education provider staff, this will be their named DSL for their offsite education provider. It is then the responsibility of the offsite education provider DSL to notify our DSL at the Unity Academy of any safeguarding concerns. This expectation has been made clear to all offsite education provider DSLs.

2.3   The Unity Academy has an internal offsite team of staff who work with pupils who are placed at offsite education providers who are in the following roles;

   a)   Unity Academy Principal

   b)   Trust AP Lead

   c)   Safeguarding and Welfare Officer

   d)   Admissions and Engagement Officer

   e)   Designated Teacher and SENCO

   f)   Education Placement Manager

   g)   Education Placement Officers

   h)   Senior Administrator

   i)   AP Taskforce

2.4   Where the term internal staff is used, it is referring to the staff in the roles above and any additional staff directly employed by Unity Academy who are working with pupils offsite.

2.5   Where the term all staff is used, it is referring to all staff that will be working with our pupils whether they are directly employed staff or staff employed by the offsite education provider.

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3. Aims

3.1 Unity Academy is committed to safeguarding and promoting the welfare of children and young people and we expect all staff and volunteers to share this commitment. Creating a culture of safety and vigilance for our pupils is of paramount importance, we aim to:

3.2 create and maintain a safe environment

3.3 manage situations should child welfare concerns arise

3.4 create an atmosphere of trust in which pupils feel confident to confide any concern

3.5 help young people to understand the difference between acceptable and non - acceptable behaviour

3.6 teach pupils to stay safe from harm

3.7 Pupils are taught about safeguarding via the education they access. How this is delivered and what is covered does vary from each offsite education provider, and this is overseen during the quality assurance activities that Unity Academy completes. All staff take welfare concerns seriously and encourage children and young people to talk about anything that worries them.

4. Legislation and statutory guidance

4.1 This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2023), the Maintained Schools Governance Guide and Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

4.2 This policy is also based on the following legislation:

a) Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils. The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques

b) Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.

c) The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

d) Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police when they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.

e) Statutory guidance on FGM, which sets out responsibilities concerning safeguarding and supporting girls affected by FGM.

f) The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

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g) Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity is in relation to children.

h) Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

i) The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

j) The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

k) The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and principal should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

l) The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

4.3 This policy also complies with the Nottingham City Safeguarding Children Partnership:

Safeguarding Children Partnership - Nottingham City Council

5. Definitions

5.1 Safeguarding and promoting the welfare of children means:

a) Protecting children from maltreatment

b) Preventing impairment of children's mental and physical health or development

c) Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

d) Taking action to enable all children to have the best outcomes

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5.2 Child Protection

5.2.1 Is part of this definition and refers to activities undertaken to prevent children from suffering, or being likely to suffer, harm or significant harm.

5.3 Abuse

5.3.1 Is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

5.4 Neglect

5.4.1 Is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

5.5 Sharing of nudes and semi nudes

5.5.1 (also known as sexting or youth-produced sexual imagery) Is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

5.6 Children

5.6.1 This includes everyone under the age of 18.

5.7 The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

a) The local authority (LA)

b) Integrated care boards (previously known as clinical commissioning group) for an area within the LA

c) The chief officer of police for a police area in the LA area

5.8 Designated Safeguarding Lead (DSL) – this term is referred to throughout the policy and refers to either the Senior or Deputy DSL in the absence of the DSL.

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6. Equality Statement

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

6.2 We give special consideration to children who:

   a) Have special educational needs (SEN) or disabilities (see section 10)

   b) Are young carers

   c) May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

   d) Have English as an additional language

   e) Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

   f) Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

   g) Are asylum seekers

   h) Are at risk due to either their own or a family member's mental health needs

   i) Are looked after or previously looked after (see section 15)

   j) Are missing or absent from education for prolonged periods and/or repeat occasions.

   k) Whose parent/carers has expressed an intention to remove them from school to be home educated. Local authorities will review the plan and work closely with parents/carers.

7. Roles and responsibilities

7.1 Safeguarding and child protection is everyone's responsibility. This policy applies to all internal staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding Partners.

   a) Nottingham City Safeguarding Children Partnership (NCSCP)

   b) Nottingham City Council Children's social care.

   c) Nottingham City Clinical Commissioning Group

   d) Nottinghamshire Police

7.2 Our policy and procedures extend to and support our pupils who access their education at offsite education providers. We share our policy with offsite education providers and ensure offsite education provider DSLs are aware of how to report safeguarding concerns to our DSL.

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7.3   Schools can play a crucial role in preventative education. This is in the context of preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, transphobia, biphobia and sexual violence/harassment. This will be underpinned by our offsite education providers;

a)   Behaviour Policy

b)   Pastoral support

c)   PSHE/RSE curriculum, which is delivered through the curriculum and, tackles issues such as;

i.   healthy and respectful relationships

ii. boundaries and consent

iii. stereotyping, prejudice and equality

iv. body confidence and self-esteem

v.   how to recognise an abusive relationship (including coercive and controlling behaviour)

vi. the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support

vii. what constitutes sexual harassment and sexual violence and why they're always unacceptable

7.4   The offsite education provider will use a range of resources to deliver their PSHE curriculum. Unity Academy will quality assure the content and delivery of this to ensure the coverage meets our requirements. We also understand that each offsite education provider is different and have its own context and reasons for what they include in their PSHE delivery.

7.5   Unity Academy has strong links with the police and other agencies to support restorative practice and address local concerns. Unity Academy currently has an Alternative Provision Taskforce (APTF) that consists of a Youth justice case manager, Targeted youth support work, a Counsellor, a Speech and Language Therapist and a Substance Misuse worker. Referrals to the APTF are received from the offsite education providers or via our internal offsite staff team. The APTF, plan bespoke interventions with the pupils depending on their needs and behaviours.

7.6   All staff will address and swiftly respond to issues such as inappropriate touching/contact and language used. Incidents of this nature are reported to the relevant DSL.

7.7   **All staff**

7.7.1   All staff and/or each offsite education provider will;

a)   Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

b)   Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

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c) Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

d) Provide a safe space for pupils who are LGBT to speak out and share their concerns.

e) Agree to take part in Unity Academy's quality assurance activities with an annual visit which focuses on safeguarding alone and covered via further quality assurance activities.

7.7.2 Offsite education providers have safe spaces that the pupils can access such as reflection rooms and pastoral hubs. Unity Academy and the offsite education provider work collaboratively to ensure there is effective pastoral care in place, including communication with family members. The offsite education provider records all discriminative incidents and ensures action is taken. Unity Academy has an overview of all incidents and actions taken. These are reported to us via offsite education provider electronic reporting systems. The pupil voice is a vital element, ensuring all pupils feel heard and supported.

7.7.3 Part of the safeguarding quality assurance work that Unity Academy completes involves speaking to staff at each offsite education provider. All staff complete safeguarding refresher training at the start of the academic year which provides an update on 'Keeping Children Safe in Education' and reminds staff of their responsibilities to safeguard the pupils and identification of risk. The staff training is tracked to provide an overview of additional sessions that may need to be arranged. The CPD programme includes sessions that cover safeguarding themes to upskill the staff on potential risks for pupils throughout the year. Safeguarding is an agenda item at briefings and each half-termly AP network meeting.

7.7.4 All staff will be aware of:

a) Systems and procedures that support safeguarding in their setting. For all staff working with our pupils, this will be dependent on which education provider they are employed by. We expect all staff working with our pupils to be aware of their relevant safeguarding policy, behaviour policy, online safety policy (which includes the expectations and roles and responsibilities in relation to filtering and monitoring), staff code of conduct, the identity/role of the designated safeguarding lead (DSL) and DSL teams, and the necessary safeguarding response to children who go missing from education (CME).

b) The early help process and their individual and team role, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.

c) The process for making referrals to the local authority children's social care and for statutory Reassessments that may follow a referral, including the role they might be expected to play.

d) What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

e) The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

f) The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

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g) The fact that children can be at risk of harm inside and outside of their home, at school and online.

h) The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.

i) What to look for to identify children who need help or protection

7.8 The Designated Safeguarding Lead (DSL)

7.8.1 Unity Academy's DSL is a member of the senior leadership team and takes lead responsibility for child protection and wider safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place. Please see 'Important contacts' (page 5) for the Academy's Safeguarding Team. The academy will check the filtering and monitoring arrangements in each AP. This is done through the quality assurance cycle. Leaders will provide an overview of filtering and monitoring processes to governance.

7.8.2 If for any reason a DSL cannot be contacted, staff must contact an Academy senior leader or the Trust Safeguarding Lead.

7.8.3 The DSL will add all offsite education provider DSLs onto Unity Academy's electronic safeguarding system, CPOMS. Offsite education providers will be alerted to all relevant safeguarding information via CPOMS allowing them to securely access this information. Where pupils attend more than one offsite education provider, all relevant DSLs receive CPOMS updates.

7.8.4 All offsite education providers know who to contact if they have a safeguarding concern regarding one of our pupils. The offsite education providers will verbally contact the DSL to share an immediate and serious concern regarding a pupil.

7.8.5 The DSL (senior/deputy) will be given the time, funding, training, resources and support to:

a) Be the first point of contact for offsite education provider staff/internal staff/DSLs concerning child welfare and child protection matters.

b) Be aware of pupils who have a social worker.

c) To ensure appropriate staff training is in place, including online safety training and that it is updated regularly and is line with advice from the safeguarding partners.

d) Ensure that the provider has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:

   i. Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.

   ii. Reviewing the DfE's filtering and monitoring standards, and discussing with IT providers what needs to be done to support the school in meeting these standards

e) Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and school leadership staff.

f) Provide advice and support to other staff on child welfare and child protection matters, including delivering staff annual training and termly updates.

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g) Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.

h) Contribute to the assessment of children.

i) Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly. See 15.5

j) Complete safeguarding induction e.g. agency staff, including obtaining safer recruitment information for the SCR, if appropriate.

k) Record, monitor and track all referrals.

l) Carry out regular quality assurance on all records and referrals (carried out by the Lead DSL weekly and the Trust safeguarding lead each term. The DSL will attend safeguarding meetings, to offer support and advice.

m) Ensure that child protection information is transferred to the pupil's new school or new offsite education provider. In the majority of cases, this is via CPOMS, electronic transfer. However, if this is not the case Unity Academy will send this information securely by recorded delivery or hand-delivered. Records that are signed for and dated receipts are kept on file.

n) Ensuring risk assessments put in place for pupils are recorded on our system. Unity Academy uses Pupil logs to risk assess the arrangements for all pupils off-site and update these risk assessments for pupils when required, for example, if new concerns are recognised. These documents are shared with offsite education providers when pupils are referred to them.

o) Have a good understanding of harmful sexual behaviour through annual online training and CPD sessions.

p) Have a good understanding of the filtering and monitoring systems and processes in place at our school.

q) To oversee the completion of an annual safeguarding checklist at all offsite education providers.

r) To liaise with the Trust safeguarding Lead as necessary for support, advice, and supervision

s) Co-ordinate the Alternative Provision Taskforce (APTF).

t) Maintain a vulnerable pupil list and record which agencies are working with each pupil.

7.8.6 The full responsibilities of the DSL and deputies are within the appendices of this policy.

7.8.7   The DSL will also:

a)   Keep the Principal informed of any issues. Unity Academy has a weekly safeguarding meeting that is recorded, and the actions are stored on CPOMS. All members of the safeguarding team attend the meeting. The safeguarding records are quality assured in these meetings and actions are discussed for all pupils that are currently open to social care or at potential risk.

b)   Liaise with local authority case managers and designated officers for child protection concerns as appropriate.

c)   Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to support the development of academy and trust policies, by attending multi-agency network meetings. The local police will contact the principal/DSL to share local risks that are a current concern.

d)   Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.

e)   Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search – PACE Code C2029.

f)   Seek advice/guidance from the Trust Safeguarding Lead.

g)   Share relevant safeguarding information and updates, including online safety with all DSLs that are involved in working with a pupil.

7.9 Local Governor Body

7.9.1   All Governors have an enhanced DBS which is recorded on the single central record (SCR) and 128 management checks are carried out and recorded. The Chair of Trustees has an enhanced DBS which is countersigned by the Secretary of State.

7.9.2   Governors have a key responsibility for monitoring safeguarding and child protection across Unity Academy. This is through the termly governing body meetings and the trust quality assurance processes such as the annual safeguarding audit. The head teachers report includes an overview of current open cases, referrals and risk factors for the pupils. It also provides additional information for scrutiny such as training and the curriculum   priorities   for   all   aspects   of safeguarding.

7.9.3   Responsibilities include:

a)   To ensure a child protection /safeguarding policy is in place.

b)   To ensure procedures are in place for dealing with allegations against a member of staff not just within Unity Academy's setting but also staff's conduct outside Unity Academy's setting which is known as the 'harm' test. This is concerning a person's conduct outside Unity Academy and need not include a child, for example, domestic abuse of a partner.

c)   To ensure all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners.

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d) To ensure there is a member of the governing body who is responsible for and has been trained for safeguarding, child protection and safer recruitment.

e) To ensure policies and procedures at Unity Academy are reviewed appropriately, or earlier where necessary. The quality assurance schedule takes place through the Trust audit, site visits and via the local governing body meetings. The findings of the audits and required actions are shared with the safeguarding trustee. All policies are scrutinised and ratified by the governance.

7.9.4 They will also make sure:

a) The DSL has the appropriate status and authority to carry out its job effectively.

b) Online safety is a running and interrelated theme within the whole-academy approach to safeguarding and related policies.

c) The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.

d) Senior Leaders and the DSL are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns. This includes:

   i. Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.

   ii. Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

e) Unity Academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). The staged approach is outlined in point 15.5.

f) That this policy reflects those pupils with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised. Staff at the offsite education provider will be made aware of the specific needs of vulnerable children. Notably, social-worker children (SWC), those with SEND, those with relevant health conditions and young carers. This will include additional safeguarding risks. For SEND that includes: assumptions that indicators of possible abuse relate to the child's condition without further exploration; being more prone to child-on-child abuse; being disproportionally impacted by child-on-child abuse without showing any signs; lacking cognitive understanding (e.g. the difference between fact and fiction for online content) and communication barriers in managing/reporting these challenges. Additional training is provided for staff to support meeting the needs of pupils where required, such as the administration of medication.

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g) Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll):

    i. Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed. We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform (letter of reassurance and DBS confirmation). We will also check that the person presenting themselves for work is the same person on whom the checks have been made

    ii. Make sure there are arrangements for the body to liaise with the academy about safeguarding arrangements, where appropriate

    iii. Make sure that safeguarding requirements are a condition of using the academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply

7.9.5 The safeguarding governor receives safeguarding training that equips them with the knowledge to provide a strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at academies are effective and support the delivery of a robust whole school approach to safeguarding. This includes online training specific to governance including:

a) TES -Governance of Safeguarding

b) Prevent

c) Confederation of School Trusts, Strategic safeguarding for schools.

7.10 Trust Safeguarding Lead

7.10.1 The Trust Safeguarding Lead will offer support and challenge, concerning all safeguarding matters. Through half-termly quality assurance, they will ensure all processes and procedures operate to a high standard across all the academies within the Trust. They will update the Principal half-termly in support of the Head Teacher's report to the local governing body.

7.10.2 The Trust safeguarding Lead has the following responsibilities:

a) To support and advise on a safeguarding training programme in partnership with the academies.

b) To work collaboratively with colleagues offering support and guidance

c) To ensure the Safeguarding policy is updated in line with guidance and statutory policies.

d) To quality assures all records and referrals to external agencies.

e) To complete annual safeguarding audits are completed and shared with the appropriate stakeholders, including the Safeguarding Trustee.

f) To support the Academy Principals with allegations against staff and attending any relevant meetings

g) To chair the Trust Safeguarding Network meeting

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h)   To ensure all relevant safeguarding updates and best practices are shared within the Trust via the Safeguarding Network Meetings.

i)   To be aware of any pupils who are at a critical stage of their CP plan

j)   To provide advice to stakeholders concerning welfare, safeguarding and child protection issues.

k)   To meet with the Safeguarding Trustee annually

l)   To provide regular updates to the Central Executive team

m)   To oversee the Single Central Record across the academy sites

n)   To work alongside the Trust Data Protection Officer with regards to Subject Access Requests with a safeguarding nature.

7.11   The Principal

7.11.1 The Principal is responsible for the implementation of this policy, including:

a)   Ensuring that internal staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction

b)   Communicating this policy to parent/carers when their child joins the school and via the school website

c)   Ensuring that the DSL has appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent

d)   Ensuring that all internal staff undertake appropriate safeguarding and child protection training, and update this regularly. This must include online safety training and ensure staff have clear understanding of the filtering and monitoring arrangements in their provision.

e)   Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

f)   Ensuring the relevant staffing ratios are met, where applicable.

7.12 Virtual school heads

7.12.1 Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

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8. Confidentiality

8.1 Please see the Trust's Data Protection Policy

8.2 Personal information about all pupils' families is regarded by those who work in the academy as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality:

a) Staff understand that they need to know only enough to prepare them to act with sensitivity to a pupil and to refer concerns appropriately. The DSLs and Principal will disclose information about a pupil to other members of staff on a need-to-know basis only. It is inappropriate to provide all staff with detailed information about the pupil, incidents, the family and the consequent actions.

b) All academy staff operate within the information-sharing advice document July 2018 'Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many Serious Case Reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.'

c) [DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people,parents and carers (publishing.service.gov.uk)](#)

9. Recognising abuse and taking action

9.1 All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

a) Is disabled

b) Has special educational needs (whether they have a statutory education health and care (EHC) plan)

   i. Is a young carer

   ii. Is bereaved

c) Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime

d) Is frequently missing/goes missing from education, care or home

e) Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

f) Is at risk of being radicalised or exploited

g) Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

h) Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

i) Is misusing drugs or alcohol

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j) Is suffering from mental ill health

k) Has returned home to their family from care

l) Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage

m) Is a privately fostered child

n) Has a parent or carer in custody or is affected by parental offending

o) Is missing education, or persistently absent from school, or not in receipt of full-time education

p) Has experienced multiple suspensions and is at risk of, or has been permanently excluded

9.2 Staff, volunteers and governance must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean "the Senior/Deputy DSL or Safeguarding Team."

10. If a child is suffering or likely to suffer harm, or in immediate danger

10.1 Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral.

10.2 Tell the DSL as soon as possible if you make a referral directly.

a) Multi-Agency Safeguarding Hub:
Email: citymash@nottinghamcity.gov.uk
Tel: 0115 9155555
Out of hours contact number - 0115 9159299

b) GOV.UK webpage for reporting child abuse to your local council:

https://www.gov.uk/report-child-abuse-to-local-council

11. If a child makes a disclosure to you

11.1 Our internal staff are trained in how to support a child if they make a disclosure to them. This is covered in the annual face-to-face safeguarding training, online training and as part of staff induction. As well as being revisited via case studies and scenario sessions throughout the academic year to act as a regular refresher on how to manage disclosures. Consideration is made for pupils who have speech, language and communication difficulties and pupils that have English as their second language.

11.2 For staff at offsite education providers, this is covered in the safeguarding training that they provide to staff. This is quality assured by the Trust quality assurance team and quality assurance activities, which includes speaking to offsite provider staff.

11.3 As a point of reference to all staff; If a child discloses a safeguarding issue, you should:

a) Allow them time to talk freely and do not ask leading questions. Listen to the child non-judgementally.

b) Stay calm and do not show that you are shocked or upset

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c)   Do not make personal comments e.g. if a pupil asks "what do you think?"

d)   Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

e)   Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

f)   Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

g)   Write-up and submit via the electronic safeguarding system (by the end of the day), alerting the DSL/Principal (staff must notify the DSL/Principal in person of any concerns where a child may be at risk if they were to go home). Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so.

11.4   If the electronic safeguarding system is unavailable, make a written record and upload it onto the electronic safeguarding system at the earliest opportunity.

12.   If you discover that FGM has taken place or a pupil is at risk of FGM

12.1   The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs".

12.2   FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

12.3   Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

12.4   Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally (with support from the DSL). This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

12.5   Unless they have been specifically told not to disclose, involve children's social care as appropriate.

12.6   Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL, immediately.

12.7   The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

12.8   Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL, immediately and follow our local safeguarding procedures.

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13. If you have concerns about the welfare of a child, not at risk of immediate harm

13.1   Figure 1 illustrates the procedure to follow if you have any concerns about a child's welfare.

13.2   Where possible, speak to the DSL first or the deputy DSL in their absence to agree on a course of action.

13.3   If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

13.4   Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL or deputy DSL as soon as possible or a senior leader.

13.5   All offsite education providers work closely with our safeguarding team and all safeguarding concerns, discussions, decisions made and the reasons for those decisions, will be recorded on CPOMs by Unity Academy. Staff can choose to upload a handwritten record on CPOMs if required. If there is any doubt about whether to record something, discuss it with the DSL. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Any safeguarding logs including child protection are recorded securely on CPOMS and will include:

   a)   A clear and comprehensive summary of the concern

   b)   Details of how the concern was followed up and resolved

   c)   Notes of any action taken and decisions reached (including a rationale/justification for these decisions as appropriate).

13.6   Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or a deputy) and the SENCO. Unity Academy will provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place

13.7   Where appropriate, we will discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a concern or disclosure.

13.8   Other staff will only talk to parents/carers about any such concerns following consultation with the DSL. If we believe that notifying the parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

13.9   In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved unless this would impact any potential investigation or place any children at risk of harm.

13.10 Any meetings with parents/carers that relate to safeguarding (including pastoral meetings for attendance/behaviour/wellbeing) will be recorded on CPOMS.

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14. Early help

14.1   If early help is appropriate, a DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

14.2   The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

14.3   Procedures for early help may include:

a)   Referral to the Alternative Provision Taskforce

b)   Behaviour Therapist

c)   CAMHS

d)   MARF (DSL will make this referral)

e)   Additional needs (SEND via the LEA)

15. Referral

15.1   If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

15.2   If you make a referral directly, you must tell the DSL as soon as possible.

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

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

15.5   For information on escalation procedures please refer to the Trust Safeguarding Lead, who will provide the appropriate support and advice.

16. If you have concerns about extremism - PREVENT Strategy

16.1   The Prevent Lead for Unity Academy is Luke Sisson

16.2   The Prevent officer for the local authority is Louise Cox Louise.cox@nottinghamcity.gov.uk Tel: 0115 8765864

16.3   **Radicalisation**

16.3.1 This refers to the process of a person legitimising support for, or use of, terrorism

16.4   **Extremism**

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16.4.1 This is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

    a) Negate or destroy the fundamental rights and freedoms of others; or

    b) Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights.

    c) Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

16.5 Terrorism

16.5.1 This is an action that

    a) Endangers or causes serious violence to a person/people;

    b) Causes serious damage to property; or

    c) Seriously interferes or disrupts an electronic system

16.6 The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause that endangers or causes serious violence to a person/people; causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause'.

16.7 The PREVENT Strategy aims to:

    a) Respond to the ideological challenge of terrorism and the threat we face from those who promote it.

    b) Prevent people from becoming involved with or supporting terrorism and ensure that they are given appropriate advice and support.

    c) Work with sectors and institutions where there are risks of radicalisation which we need to address

16.8 Unity Academy's PREVENT risk assessment arrangements:

    a) Unity Academy will risk assess to fulfil the duty to prevent children from being drawn into terrorism.

    b) The DSL will undertake Prevent awareness training and make sure that all staff have access to appropriate training to equip them to identify children at risk.

    c) The DSL will assess the risk of children at Unity Academy being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our Local Safeguarding Partners.

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16.9 If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree on a course of action. Alternatively, make a referral to the local authority children's social care directly if appropriate (see referral process).

16.10 Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team. If there are concerns that the child is at risk of harm then a referral must be made to children's social care regardless of whether a Channel referral is deemed appropriate. An individual will be required to give consent before any support through the Channel programme is provided.

16.11 The Department for Education (DfE) also has a dedicated telephone helpline, 020 7340 7264, that all staff and regional teams can call to raise concerns about extremism concerning a pupil. You can also email counter.extremism@education.gov.uk Note that this is not for use in emergency situations.

16.12 In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

   a)   Think someone is in immediate danger;

   b)   Think someone may be planning to travel to join an extremist group

   c)   See or hear something that may be terrorist-related

16.13 We will ensure that suitable internet filtering/supervision is in place and equip our pupils to stay safe online at the academy, at offsite education providers and at home.

16.14 There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

16.15 The government website Educate Against Hate https://educateagainsthate.com/ and charity NSPCC say that signs that a pupil is being radicalised can include:

   a)   Refusal to engage with, or becoming abusive to, children who are different from themselves;

   b)   Becoming susceptible to conspiracy theories and feelings of persecution

   c)   Changes in friendship groups and appearance;

   d)   Rejecting activities they used to enjoy;

   e)   Converting to a new religion;

   f)   Isolating themselves from family and friends;

   g)   Talking as if from a scripted speech;

   h)   An unwillingness or inability to discuss their views;

   i)   A sudden disrespectful attitude towards others;

   j)   Increased levels of anger;

   k)   Increased secretiveness, especially around internet use;

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l) Expressions of sympathy for extremist ideologies and groups, or justification of their actions.

m) Accessing extremist material online, including via social media platforms.

n) Possessing extremist literature;

o) Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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

16.17 Staff must always take action if they are worried.

17. If you have a mental health concern about a child

17.1 Supporting all children's mental health is a key priority for the Trust (and is specifically included within the Keeping Children Safe in Education definition of 'safeguarding') and this includes preventing/acting on abuse caused by impairment of a child's mental health or development. All internal staff will be trained in the signs/symptoms of poor mental health and will record their concerns on CPOMS using the mental health category as well as informing the DSL immediately if they perceive that the child is at risk of harm (including through self-harm or suicide).

17.2 The designated person for Mental First Aid (Youth and Adults) is: Elizabeth Browne (Trust Executive Principal) MHFA (England)

17.3 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. Poor attendance to school can be an indicator of mental health problems

17.4 All staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

17.5 Where staff have a mental health concern for a child where there are also safeguarding concerns then immediate action will be taken including the DSL.

17.6 If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action.

18. Concerns about a staff member, supply teacher or volunteer

18.1 If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the Academy Principal. The Academy Principal will contact the Trust safeguarding Lead. If the concerns/allegations are about the Principal, speak to the Trust's CEO (Sean Kelly) if the concerns/allegations are about the CEO, speak to the chair of the Board of Trustees. Contact details can be obtained through the Trust governance professional Claire.Beardsall@raleightrust.org. For staff at offsite education providers, each offsite education provider has its own internal whistleblowing policy.

18.2 This applies to all cases where it is alleged that a staff member, supply teacher or volunteer has:

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a) behaved in a way that has harmed a child, or may have harmed a child

b) possibly committed a criminal offence against or related to a child

c) behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;

d) behaved or may have behaved in a way that indicates they may not be suitable to work with children

18.3 Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the head teacher, report it directly to the local authority designated officer (LADO).

18.4 If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

19. Non-recent allegations

19.1 Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

20. Low-level concerns

20.1 In line with Section Two of Part Four of Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately. The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored and reinforced by staff.

20.2 **Definition of low-level concerns:**

20.2.1 The term 'low-level' concern does not mean that the concern is insignificant, it means that the threshold set out at the start of 8.7 has not been met. A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the academy/trust may have acted in a way that:

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

b) examples of such behaviour could include, but are not limited to:

i. being over-friendly with children

ii. having favourites

iii. taking photographs of children on a personal mobile phone

iv. engaging with a child on a one-to-one basis in a secluded area or behind a closed door

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v. using inappropriate sexualised, intimidating or offensive language. *Such behaviour can exist on a spectrum.*

20.3 Sharing low-level concerns

20.3.1 Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Principal and or DSL. Any concerns about the Principal should be reported to the Trust Chief Executive Sean Kelly.

20.4 Recording low-level concerns

20.4.1 All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and the action is taken., held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a concern to meeting the harms threshold.

20.5 Low-level concerns and references

20.5.1 Low-level concerns will not be included in references unless they relate to issues that would normally be included in a reference, for example, misconduct or poor performance. Where a low-level concern has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference. The Academy principal will review and monitor low-level concerns. The notes will be recorded electronically. The principal will address patterns forming and escalate to the LADO if required. The principal will receive support from the Director of Education to discuss individual cases if they arise. HR will also highlight any patterns or concerns to the principal.

21. Allegations of abuse made against other pupils

21.1 We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

21.2 We also recognise the gendered nature of child-on-child abuse (previously known as peer-on-peer abuse). However, all child-on-child abuse is unacceptable and will be taken seriously through our referral processes and curriculum that helps pupils understand what is and what is not ok. This is also part of internal staff safeguarding training so that staff understand and reinforce to the pupils that 'banter' is never acceptable.

21.3 Most cases of pupils hurting other pupils will be dealt with under the offsite education providers' Behaviour Policy and/or the individual settings' behaviour guidance, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. Child-on-child abuse is most likely to include, but may not be limited to:

a) Bullying (including cyberbullying, prejudice-based and discriminatory bullying)

b) Abuse in intimate personal relationships between peers

c) Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element that facilitates, threatens and/or encourages physical abuse)

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d)   Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element that facilitates, threatens and/or encourages sexual violence)

e)   Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

f)   Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

g)   Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth-produced sexual imagery)

h)   Upskirting, which typically involves taking a picture under a person's clothing without their permission, to view their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

i)   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).

j)   Use of drugs or alcohol, where a pupil is forced/coerced to participate in

21.4   If a pupil makes an allegation of abuse against another pupil:

a)   You must record the allegation (under the 'child-on-child abuse' category) and tell the DSL, but do not investigate it

b)   The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

c)   The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

d)   The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

21.5   For further information refer to the Trust Relationships & Positive Behaviour Policy, the Academy's Behaviour guidance (and Anti-Bullying policy) and the relevant offsite education provider behaviour policy.

21.6   We will minimise the risk of child-on-child abuse by:

a)   Challenging any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

b)   Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.

c)   Ensuring the curriculum helps to educate pupils about appropriate behaviour and consent.

d)   Ensuring pupils can easily and confidently report abuse using reporting systems.

e)   Ensuring staff reassure victims that they are being taken seriously.

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f) Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.

g) Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

h) Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

i) Ensuring internal staff are trained to understand:

    i. How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.

    ii. That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

    iii. That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

- Children can show signs or act in ways they hope adults will notice and react to

- A friend may make a report

- A member of staff may overhear a conversation

- A child's behaviour might indicate that something is wrong

    iv. That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

    v. That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

    vi. The important role they must play in preventing child on child abuse and responding where they believe a child may be at risk from it

    vii. That they should speak to the DSL if they have any concerns

    viii. That social media is likely to play a role in the fall-out from any incident or alleged incident, including potential contact between the victim, alleged perpetrator(s) and friends from either side

22. Sharing of nudes and semi-nudes ('Sexting')

22.1 Your responsibilities when responding to an incident

22.1.1 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

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22.1.2 The DSL will report incidents of this nature to the police in the first instance to establish whether a criminal offence has taken place. The DSL will ensure the police are aware of any referrals made to social care.

22.1.3 You must **not**:

a) View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it. (if you have already viewed the imagery by accident, you must report this to the DSL)

b) Delete the imagery or ask the pupil to delete it.

c) Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

d) Share information about the incident with other members of staff, pupil(s), or parents/ carers that are not directly involved.

e) Say or do anything to blame or shame any young people involved.

22.1.4 You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

22.2 Initial review meeting

22.2.1 Following a report of an incident, the DSL/Principal will organise an initial review meeting with appropriate   school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

a) Whether there is an immediate risk to pupil(s)

b) If a referral needs to be made to the police and/or children's social care

c) If it is necessary to view the image(s) to safeguard the young person (in most cases, images or videos should not be viewed)

d) What further information is required to decide on the best response

e) Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

f) Whether immediate action should be taken to delete or remove images or videos from devices or online services

g) Any relevant facts about the pupils involved which would influence risk assessment

h) If there is a need to contact another school, college, setting or individual

i) Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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j) The DSL will make an immediate referral to police and/or children's social care if:

i. The incident involves an adult

ii. There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

iii. What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent

iv. The imagery involves sexual acts and any pupil in the images or videos is under 13.

v. The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

22.2.2 If none of the above applies then the DSL, in consultation with the principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

22.3 Further review by the DSL

22.3.1 If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

22.3.2 They will hold interviews with the pupils involved (if appropriate).

22.3.3 If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

22.4   Informing parent/carers

22.4.1 The DSL will inform parent/carers at an early stage and keep them involved in the process unless there is a good reason to believe that involving them would put the pupil at risk of harm.

22.5 Referring to the police

22.5.1 If it is necessary to refer an incident to the police, this will be done via calling 101.

22.6   Recording incidents

22.6.1 All sexting incidents and the decisions made in responding to them will be recorded via our electronic safeguarding system.

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22.7 Curriculum Coverage

22.7.1 Each provider has their own PSHE programme that is tailored for their setting, the academy has an overview of all plans and quality assure annually to ensure statutory requirements are met. Pupils are taught about issues such as sexting, sharing of nudes and semi-nudes as part of PSHE and/or computing programmes. An example of the content:

    a) What it is

    b) How it is most likely to be encountered

    c) The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

    d) Issues of legality

    e) The risk of damage to people's feelings and reputation

    f) Pupils also learn the strategies and skills needed to manage:

        i. Specific requests or pressure to provide (or forward) such images

        ii. The receipt of such images

22.7.2 Each provider ensures that the pupils are aware of their trusted adults on site to share any concerns such as sexting.

22.7.3 Teaching follows best practice in delivering safe and effective education, including:

    a) Putting safeguarding first

    b) Approaching from the perspective of the child

    c) Promoting dialogue and understanding

    d) Empowering and enabling children and young people

    e) Never frightening or scare-mongering

    f) Challenging victim-blaming attitudes

22.8 Notifying parent/carer(s)

22.8.1 Where appropriate, we will discuss any concerns about a child with the child's parent/carers. The relevant DSL will normally do this in the event of suspicion or disclosure.

22.8.2 Other staff will only talk to parent/carers about any such concerns following consultation with the relevant DSL.

22.8.3 If we believe that notifying the parent/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

22.8.4 In the case of allegations of abuse made against other children, we will normally notify the parent/carers of all the children involved.

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22.9 **Reporting systems for our pupils**

22.9.1 Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

22.9.2 We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

22.9.3 To achieve this, we will:

a) Put systems in place for pupils to confidently report.

b) Ensure our reporting systems are well-promoted, easily understood and easily accessible for pupils. Leaders will ensure all displays are updated for any mid-year changes and reviewed annually.

c) Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

23. Artificial intelligence (AI)

23.1 Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

23.2 Unity Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

23.3 Staff will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy. Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

24. Pupils with special educational needs and disabilities

24.1 We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers.

24.2 Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

a) Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration

b) Pupils being more prone to peer group isolation than other pupils

c) The potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

d) Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

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e) Communication barriers and difficulties in overcoming these barriers (e.g. the difference between fact and fiction for online content) and barriers in managing/reporting these challenges)

24.3 We offer extra pastoral support for these pupils but due to the nature of our academies, this will vary based upon pupil need. Staff will be made aware of the specific needs of vulnerable children. Notably, social-worker children (SWC), those with SEND, those with relevant health conditions and young carers. This will include additional safeguarding risks.

25. Children absent from education

25.1 We monitor attendance carefully and address poor or irregular attendance without delay. We will always ensure that follow-ups with parent /carers when pupils are not at school are completed. This is monitored through daily registers being sent by offsite education providers to the Trust Attendance Team. We share all relevant contact details with offsite education providers and parent/carers should remember to update the school as soon as possible if their contact details change. Offsite education providers update the Academy if they are aware of any contact detail changes.

25.2 If there is a concern a child may be absent from education, the Academy's DSL will follow Nottingham City protocols and procedures for reporting. The Trust attendance team ensure all our pupils are safe by tracking attendance daily, home visit welfare checks will be completed by the team for any pupil who is absent for consecutive days and there are concerns. A member of the attendance team attends the weekly safeguarding meeting so that information can be shared and actioned related to missing children or persistent absentees as a precaution to prevent a child from going missing.

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

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

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

26. Together we can stop child sexual abuse

26.1 No child should be a victim of sexual abuse (please see appendix 1) and the academy is committed to preventing children from becoming/being victims of sexual abuse. If staff have any concerns, they must report these to the DSL immediately or/and contact the NSPCC on

Tel: 0800 800 5000
Email: help@nspcc.org.uk
For further information please visit the 'Stop abuse together campaign' website
https://stopabusetogether.campaign.gov.uk/

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27. Contextual Safeguarding

27.1 Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. **All** staff, but especially the DSL (and 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. Children's social care assessments should consider such factors so schools must provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

28. Pupils with a social worker

28.1 Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

28.2 The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

28.3 Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

a) Responding to unauthorised absence or missing education where there are known safeguarding risks

b) The provision of pastoral and/or academic support

29. Pupils who are lesbian, gay, bisexual or gender questioning

29.1 We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

29.2 We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

29.3 When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

29.4 When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

29.5 We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

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29.6   Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

30. Looked after children and previously looked after children (known in Nottingham as Children in care)

30.1   Our Designated Teacher for children in Care is Michele Picker

30.2   We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:

    a)   Appropriate staff have relevant information about children's looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

    b)   The DSL has details of children's social workers and relevant virtual school heads.

30.3   Our academy has an appointed designated teacher (please see 'Important contacts'), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children (children in care - Nottingham) in line with statutory guidance.

30.4   The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

30.5   As part of their role, the designated teacher (appropriately trained) will:

    a)   Work closely with the relevant DSL(s) to ensure that any safeguarding concerns regarding Children looked after and previously children in care are quickly and effectively responded to.

    b)   Work with the virtual school head to discuss how funding can be best used to support the progress of looked-after children in the academy and meet the needs identified in the child's personal education plan.

    c)   Work with the virtual school head to promote the educational achievement of previously looked after children.

    d)   Attend PEP meetings and reviews and in their absence send a report in advance of the meeting.

    e)   Store all information and records of meetings on CPOMS.

    f)   Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

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31. Online Safety and the use of mobile technology

31.1   We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and well-being issues.

31.2   To address this, our Academy aims to:

a)   Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors

b)   Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

c)   Set clear guidelines for the use of mobile phones for the whole school community

d)   Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

e)   Receive regular website filter alerts from IT support and act accordingly. Unity Academy and the Trust will use filtering and monitoring results to inform policy and practice and will regularly review their effectiveness. All users are made aware that their online access is being monitored via staff training, staff handbooks and computing lessons. Each offsite education provider has its own systems in place for website filtering and this forms part of the safeguarding checklist that is completed by the Academies. Appendix 4.

f)   IT services are provided by Fly Wheel IT services. Telephone -01905 788023,

g)   email: helpdesk@flywheel-it.co.uk

31.3   The 4 key categories of risk

31.3.1 Our approach to online safety is based on addressing the following categories of risk:

a)   Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

b)   Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults to groom or exploit them for sexual, criminal, financial or other purposes

c)   Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

d)   Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

31.3.2 To meet our aims and address the risks above we will:

a) Ensure pupils learn about online safety as part of their education offer. This will be done via our quality assurance activities.

b) Ensure all staff are offered relevant training on safe internet use and online safety issues, including cyberbullying and the risks of online radicalisation.

c) Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.

d) Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

e) Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

f) Ensure that offsite education providers have in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the settings IT systems.

31.3.3 For further information please refer to Unity Academy's Online Safety/E-Learning Policy/relevant offsite education provider policy.

32. Mobile phones and cameras

32.1 Unity Academy recognises that the offsite education providers have different policies regarding pupil mobile phones on site. Our quality assurance processes will ensure the curriculum and behaviour policies on-site educate and safeguard the pupils regarding this.

32.2 Staff will not take pictures or recordings of pupils on their personal phones or cameras.

32.3 We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

33. Complaints and concerns about school

33.1 Complaints against staff that are likely to require a child protection investigation will be handled following our procedures for dealing with allegations of abuse made against staff (section 8.7). Also, please refer to the Trust's complaints policy.

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34. Whistle-blowing

34.1   Please see the Trust's Whistle-blowing policy.

Raleigh Education Trust Policies (raleightrust.org)

34.2   NSPCC Whistle-blowing helpline: 0800 0280285

34.3   Each offsite education provider has its own whistle-blowing policy. Copies of policies are available directly from offsite education provider websites or upon request.

35.   Record-keeping

35.1   We will hold records in line with our records retention schedule.

35.2   All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded via the electronic safeguarding system. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

35.3   Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

35.4   Safeguarding records relating to individual children will be retained in line with KCSIE and the Trust's retention schedule.

35.5   If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. Also, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

36.   Training

36.1   **All staff**

36.1.1 All staff members will undertake safeguarding and child protection procedures, including online safety training at induction, including whistle-blowing procedures, to ensure they understand the safeguarding systems, responsibilities, and can identify signs of possible abuse or neglect. New staff will receive safeguarding training. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners. The training must include an understanding of the expectations for online safety, roles and responsibilities around filtering and monitoring.

36.1.2 All internal staff will complete the Trust's mandatory safeguarding e-learning modules scheduled throughout the academic year. Safeguarding training will be tracked via the academy's MIS.

36.1.3 All internal staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. This training will be refreshed annually via an online training platform. Prevent training is also completed by offsite education provider staff and evidence of this is seen during a focused Safeguarding quality assurance visit.

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36.1.4 Staff will also receive regular safeguarding and child protection updates including online safety (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

36.1.5 Volunteers will receive appropriate training, if applicable.

36.1.6 All internal staff receive annual and ongoing contextualised safeguarding training, such as:

a)   child sexual exploitation

b)   child criminal exploitation

c)   protecting children from county lines

d)   domestic abuse

36.1.7 Each offsite education provider has its own CPD offer and they provide relevant training for their staff.

36.1.8 Unity Academy has offered and provided an online training package to all offsite education providers.

36.1.9 Additional training is provided by the Academy and offsite education provider staff are invited to these training sessions. The half-termly AP network meeting is a further opportunity where relevant safeguarding updates are discussed – these include sharing key updates from the termly Nottingham City DSL network.

36.1.10 All staff are aware a child may not be ready to disclose concerns. Staff should maintain professional curiosity and report to the DSL.

36.2 The Designated Safeguarding Lead (DSL) and deputy DSL(s)

36.2.1 The DSL will undertake child protection and safeguarding training at least every 2 years.

36.2.2 In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through Nottingham city DSL termly networks, e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

36.2.3 They will also undertake Prevent awareness training annually.

36.2.4 The DSLs will be supported by the Trust Safeguarding Lead and the Safeguarding Network.

36.3 Board of Trustees/ Governors

36.3.1 All trustees/governors receive safeguarding training at induction which is updated annually. This is to make sure that they:

a)   Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.

b)   Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

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36.3.2 As the chair of trustee/governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the principal/headteacher, they receive training in managing allegations for this purpose.

36.4 **Recruitment – interview panels**

36.4.1 Please refer to the Trust's Safer Recruitment policy.

Raleigh Education Trust Policies (raleightrust.org)

36.4.2 We ensure that offsite education providers provide us evidence that they have made the appropriate level of safeguarding and recruitment checks on staff they directly employ. This includes directly supporting Alternative provisions in completing the prohibition of teaching check for their staff. This forms part of the safeguarding checklist that is completed annually.

37. Staff who have contact with pupils and families

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

37.2 At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

38. Restrictive Positive Intervention

38.1 Restraint may be necessary to safeguard the individual and/or others from serious injury or harm, and sometimes it will be the only realistic option, for example, to prevent a child from running into a busy road.

38.2 We aim to promote a positive and proactive approach to behaviour, including de-escalation techniques appropriate to the child or young person, to minimise the likelihood of or avoid the need to use restraint.

38.3 The use of restraint is based on an assessment of risk and to safeguard the individual or others.

38.4 Restraint should only be used where it is necessary to prevent the risk of serious harm, including injury to the child or young person.

38.5 Offsite education providers will report any incidents of restraint being used to our DSL. All incidents of this nature will be recorded on CPOMS and actions checked and monitored if required.

38.6 For further details please read the Trust Relationships & Positive Behaviour, and Restrictive Physical Intervention policies.

39. Screening and searching process

39.1 Please refer to the Trust Relationships & Positive Behaviour Policy as well as the relevant offsite education provider behaviour policy/screening and searching policy.

40. Monitoring arrangements

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40.1 This policy will be reviewed annually by the Trust. At every review, it will be approved by the full governing board.

41. Links with other policies

41.1 This policy links to the following policies and procedures:

a) Relationships & Positive Behaviour Policy, and the academy's behaviour guidance

b) Anti-bullying

c) Restrictive Positive Intervention

d) Staff Code of Conduct (also known as staff behaviour policy)

e) Whistle-blowing

f) Complaints

g) Health and Safety

h) Attendance

i) Online safety/E-learning

j) Equality

k) Sex and relationship education

l) First aid

m) Curriculum

n) Privacy notices

o) Safer Recruitment

p) GDPR, Data protection

q) Disciplinary

r) SEND

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42. Figure 1 - Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 13.3 for what to do.)

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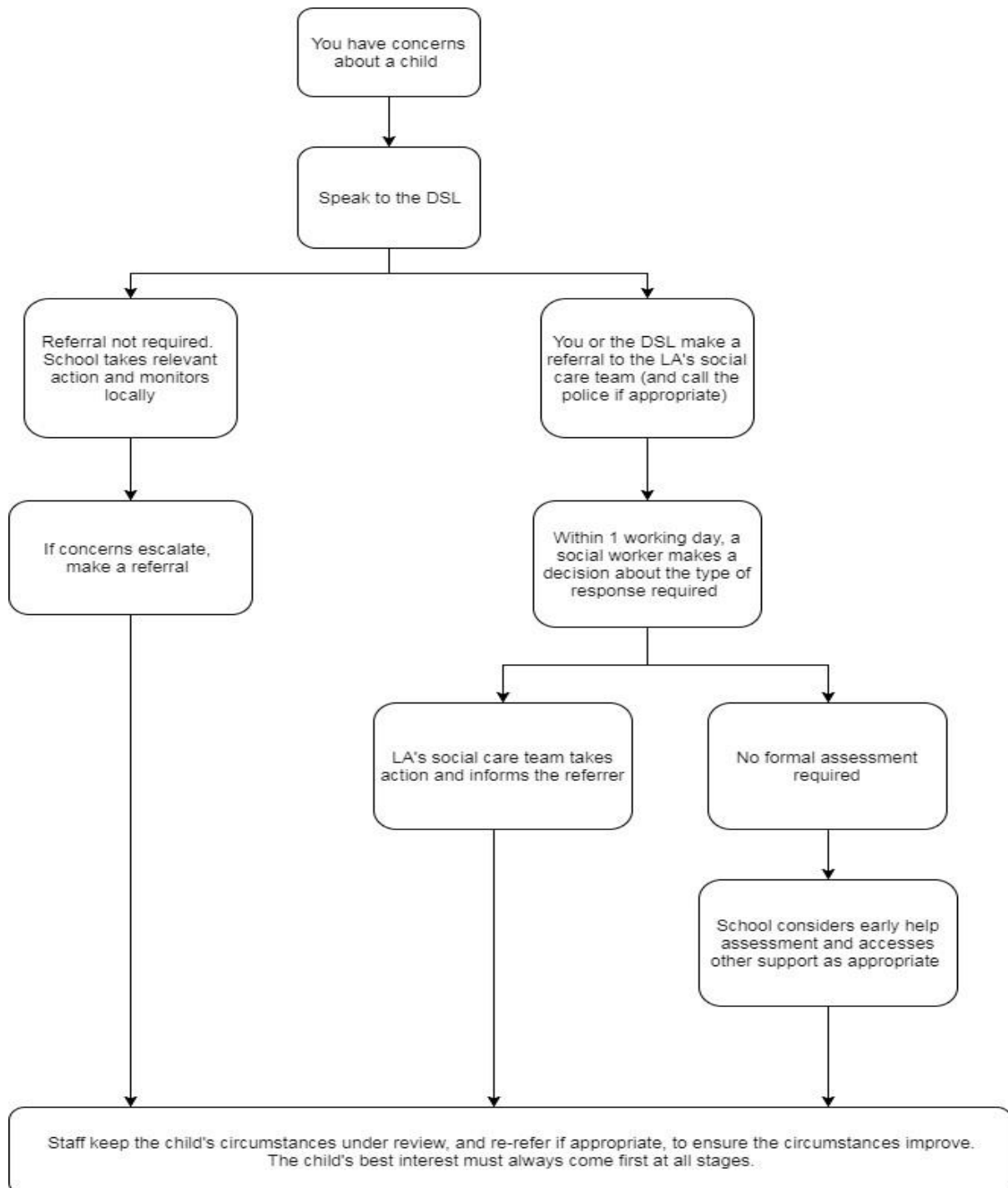
Appendix 1 - Abuse

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education & working together to safeguard children.

Types of abuse

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

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

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

Emotional abuse may involve:

a) Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

b) Not giving the child opportunities to express their views, deliberately silencing them or 'making fun of what they say or how they communicate

c) Age or developmentally inappropriate expectations are being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction

d) Seeing or hearing the ill-treatment of another

e) Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

a) 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

b) Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

c) Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

d) Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

e) Protect a child from physical and emotional harm or danger

f) Ensure adequate supervision (including the use of inadequate caregivers)

g) Ensure access to appropriate medical care or treatment

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

Up skirting

"The Voyeurism (Offences) Act, which is commonly known as the Up-skirting Act, came into force on 12 April 2019. 'Up skirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim." (Keeping Children Safe in Education)

Fabricated-induced illness

Fabricated or induced illness (FII) is a form of child abuse, It occurs when a parent or carer, usually the child's biological mother exaggerates or deliberately causes symptoms of illness in the child. FII is also known as Munchausen's syndrome by proxy. FII is a child protection issue and cannot be treated by the NHS alone. Therefore, if staff suspect FII they must follow their Academies safeguarding procedures by reporting concerns through the safeguarding electronic system and informing the DSL immediately, the DSL will refer the concerns to the MASH. If you suspect that someone you know may be fabricating or inducing illness in their child, it is not recommended that you confront them directly. A direct confrontation is unlikely to make a person admit to wrongdoing, and it may allow them to dispose of any evidence of abuse.

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Appendix 2 – Specific Safeguarding Issues

Some children and young people may be particularly vulnerable to abuse and harm. The designated safeguarding lead should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (Safeguarding Partnership) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm. It must be noted some of the texts are directly taken from Keeping Children Safe in Education 2022.

Child Sexual Exploitation

The statutory definition of Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

a)   in exchange for something the victim needs or wants, and/or

b)   for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. It may, or may not, be accompanied by violence or threats of violence. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

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

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

Who is at risk?

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

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

In all its forms, CSE is child abuse and should be treated as a child safeguarding issue.

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Child Criminal Exploitation (CCE)

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

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology.

Some of the following can be indicators of CCE:

a)   children who appear with unexplained gifts or new possessions.

b)   children who associate with other young people involved in exploitation.

c)   children who suffer from changes in emotional well-being.

d)   children who misuse drugs and alcohol.

e)   children who go missing for periods or regularly come home late.

f)   children who regularly miss school or education or do not take part in education.

County Lines

Criminal exploitation of children (CEC) is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

When children are not attending school, the risk that they could be exploited either criminally and/or sexually is heightened. In line with the Local Authority procedures, a CME (child missing in education) referral will be made in line with the timescales set out in the Attendance and Punctuality Policy. When the child returns to school, teachers and staff must be aware of the signs and symptoms of trauma and refer any concerns swiftly. DSLs can seek support in the case of exploitation by completing a Children at Risk of Exploitation Toolkit and contacting the Exploitation Coordinator; rachael.osborne@nottinghamcity.gov.uk

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/993172/Modern_Slavery_Statutory_Guidance__EW__Non-Statutory_Guidance__SNI__v2.3.pdf

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Honour-Based Abuse including Forced Marriage

Honour Based Abuse is a cultural, not a religious phenomenon. It impacts a range of communities. The challenges for services include developing responses that keep people safe and hold perpetrators to account without stereotyping, stigmatising or making assumptions about any given individual or community.

Honour Based Abuse, which may include forced marriage and/or female genital mutilation, is perpetrated against children and young people for several reasons. These include:

a) Protecting family 'honour' or 'Izzat'

b) To control unwanted behaviour and sexuality (including perceived promiscuity or being lesbian, gay, bisexual or transgender)

c) As a response to family, community or peer group pressure

d) Strengthening family links

e) Protecting perceived cultural and/or religious ideals (misguided or dated)

f) Retaining wealth, property or land within the family

g) Preventing unsuitable relationships

h) Assisting claims for residence and citizenship in the UK

i) Perceived immoral behaviour

j) Inappropriate make-up or dress

k) Possession and/or use of a mobile telephone

l) Kissing or showing other forms of intimacy in public

m) Rejecting a forced marriage

n) Being a victim of rape or other serious sexual assault

o) Inter-faith relationships

p) Seeking a divorce.

Forced Marriage

'A forced marriage is a marriage in which one or both spouses do not (or, in the case of children and some adults at risk, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.'

Scottish Government: "A marriage conducted without the valid consent of both parties where duress is a factor." A Choice by Right (June 2000)

Forced Marriage (Civil Protection) Act 2007 (England/Wales)

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Courts have the power to make Forced Marriage Protection Orders.

Breach of an injunction would not itself be a criminal offence but would be a contempt of court. Courts would have the full range of sanctions available to them, including imprisonment.

Enables third parties to apply for an injunction on behalf of somebody

There will be a maximum penalty of seven years for committing a forced marriage offence and a maximum penalty of five years for breach of a forced marriage protection order.

Staff must report concerns regarding forced marriage to the DSL immediately to ensure safeguarding procedures can be implemented, the DSL will inform the Academy Principal, MASH and the police.

Private Fostering

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

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

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

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

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools must inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself must inform the local authority of the private fostering arrangements.

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

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Preventing Radicalisation

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counterterrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all academies.

Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk and that staff are appropriately trained to look out for signs of radicalisation and are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology. The guidance on this has not yet been published but we will be sharing this as soon as possible as well as keeping you informed on how we are coordinating this in a partnership approach.

In the meantime, if you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact the Prevent Team prevent@nottinghamshire.pnn.police.uk. Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

To minimise the risk, staff will lookout for early signs of radicalisation/extremism, such as pupils;

    a)   showing sympathy for extremist causes

    b)   glorifying or advocating violence, especially to other faiths or cultures

    c)   intolerance of difference, including faith, culture, gender, race or sexuality

Incels Community

Definition of Incels: A member of a sprawling online community. Incels are men who describe themselves as "involuntary celibates".

"They see women as completely commodified and dehumanised sex objects [that] are there purely for male sexual pleasure. And they blame women for the fact that they're not having sex." (Guardian, 2021)

Possible indicators of Incels involvement could include:

    a)   include derogatory comments/writings/drawings about women

    b)   social isolation/exclusion and general signs of radicalisation

If staff have any concerns about a student being involved with the incel community or sharing incel ideology, they must report this immediately to the DSL/safeguarding team.

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Child-on-child abuse

We recognise that children can abuse other children and that this can happen inside or outside of school and online. This includes intra-familial harm where it is necessary to ensure appropriate support is provided to siblings. Abuse will never be tolerated or passed off as "banter" or "part of growing up". We have a zero-tolerance approach.

Examples of child-on-child abuse (but not limited to):

     a)   Bullying (including cyberbullying)

     b)   Abuse in intimate personal relationships between children (including teenage relationship abuse)

     c)   Physical abuse

     d)   Sexual violence/ harassment

     e)   Causing someone to engage in sexual activity without consent (i.e. forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party)

     f)   Consensual and non-consensual sharing of nudes and semi nudes

     g)   Upskirting

     h)   Initiation/hazing

We recognise that children can abuse other children and that this can happen inside or outside of school and online. This includes intra-familial harm where it is necessary to ensure appropriate support is provided to siblings. Abuse will never be tolerated or passed off as "banter" or "part of growing up". We have a zero-tolerance approach.

Most cases of pupils hurting other pupils will be dealt with under our academy behaviour policy, but this policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

     a)   Is serious, and potentially a criminal offence.

     b)   Could put pupils in the school at risk.

     c)   Is violent

     d)   Involves pupils being forced/coerced into drugs or alcohol.

     e)   Involves criminal exploitation, such as threatening other children into criminal activity

     f)   Involves sexual exploitation, abuse, violence or harassment

Staff are made aware of the importance of making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; challenging behaviours (potentially criminal in nature), such 25 as grabbing bottoms, breasts and genitalia, flicking bras and upskirting; dismissing or tolerating such behaviours risks normalising them. All staff will reassure victims that they are being taken seriously and will be

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supported/kept safe so that they never feel like they are creating a problem or feel ashamed for reporting. The wishes of the victim will be an important consideration. Staff receive training on how to manage a disclosure as the initial response is so important given that children may find it difficult to make a direct report.

Referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content. Our 'Filtering and Monitoring' processes ensure that any pupil who completes child on child abuse online (through academy systems) can be identified, and action taken.

If staff have any concerns about child-on-child abuse, or a child makes a disclosure to them, report immediately to the DSL. and record the allegation on CPOMS, but do not investigate it; The DSL may contact the local authority children's social care team and follow its advice, as well as the Police if the allegation involves a potential criminal offence; The DSL will put a risk assessment and support plan into place for all children involved (including consideration for before/after school activities) – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed – considering for the time and location of the incident and any action required to make the location safer; the wellbeing of all children involved is essential and the DSL will contact specialist mental health services, if appropriate. Parents/carers will be informed promptly and wherever possible, and children provided with an outcome for the allegation. The four likely scenarios for managing reports are: managed internally (i.e. through behaviour policy), Early Help referral, Social Care referral, and reporting to the Police. Deliberately false/malicious allegations will be considered in line with the behaviour policy.

The academy supports children to understand the law, this could include direct/indirect work from/with the Police Intervention Officer and the APTF.

We will minimise the risk of child on child abuse by challenging any form of derogatory or sexualised language or behaviour (as this can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future); being vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence concerning boys; ensuring our curriculum helps to educate pupils about appropriate behaviour and consent; ensuring pupils know they can talk to staff confidentially; ensuring staff are trained to recognise the signs of child on child abuse and know how to report their concerns; ensuring staff understand that a pupil harming another child could be a sign that the pupil is being abused themselves, and that this would fall under the scope of this policy.

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Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

a) Between two children of any age and sex

b) Through a group of children sexually assaulting or sexually harassing a single child or group of children

c) Online and face-to-face (both physically and verbally)

d) Sexual violence and sexual harassment exist on a continuum and may overlap.

Whilst not intended to be an exhaustive list, sexual harassment can include:

a) sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names

b) Sexual "jokes" or taunting

c) Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature

d) online sexual harassment:

   i. consensual (NOTE: consensual image sharing may not be abusive, but it is illegal) and non-consensual sharing of nude and semi-nude images – See also UKCIS advice on 'Sharing nudes and semi-nudes'

   ii. sharing of unwanted explicit content (e.g. pornography)

   iii. Misogynistic messages

   iv. Upskirting

   v. Sexualised online bullying

   vi. Unwanted sexual comments and messages, including, on social media; sexual exploitation; coercion and threat

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, staff must make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. When supporting victims, staff will:

a) Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them

b) Regularly review decisions and actions, and update policies with lessons learnt

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c) Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

d) Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

e) Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

f) Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

a) Challenging inappropriate behaviours

b) Making clear that sexual violence and sexual harassment are not acceptable, will never be tolerated

c) and is not an inevitable part of growing up

d) Challenging physical behaviours (potentially criminal), such as grabbing bottoms, breasts and genitalia,

e) pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks in normalising behaviour.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to DSL immediately.

Serious violence

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

a) Increased absence from school

b) Change in friendships or relationships with older individuals or groups

c) Significant decline in performance

d) Signs of self-harm or a significant change in wellbeing

e) Signs of assault or unexplained injuries

f) Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)

g) For further information please go to the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance

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Risk factors that increase the likelihood of involvement in serious violence include:

a) Being male

b) Having been frequently absent or permanently excluded from school

c) Having experienced child maltreatment

d) Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Children who self-harm

Staff **must** always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary-age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill-treatment that isn't physical, as well as witnessing the ill-treatment of others – for example, the impact of all forms of domestic abuse on children, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day – part of Operation Encompass (see section below).

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Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the designated safeguarding lead in school before the child or children arrive at school the following day.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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

Homelessness

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

The DSL will be aware of contact details and referral routes to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and following local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents:

a) Sexually motivated incidents

   i. In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

   ii. To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

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iii. Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

iv. Potential signs of adult-involved grooming and coercion can include the child or young person being:

v. Contacted by an online account that they do not know but appears to be another child or young person

- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited mages

- Moved from a public to a private/E2EE platform

- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes

- Offered something of value such as money or gaming credits

- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

b) Financially motivated incidents

i. Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

ii. Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

iii. Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them

- Use images that have been stolen from the child or young person taken through hacking their account

- Use digitally manipulated images, including AI-generated images, of the child or young person

iv. The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

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v. Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person

- Quickly engaged in sexually explicit communications which may include the offender sharing an image first

- Moved from a public to a private/E2EE platform

- Pressured into taking nudes or semi-nudes

- Told they have been hacked and they have access to their images, personal information and contacts

- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

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Appendix 3 – Information and support

There is a wealth of information available to support schools, colleges and parents/carers to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

a) Childnet provide guidance for schools on cyberbullying   https://www.childnet.com

b) Educateagainsthate provides practical advice and support on protecting children from extremism and radicalisation

c) London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements

d) NSPCC provides advice on all aspects of a school or college's online safety arrangements

e) Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective

f) Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones

g) South West Grid for Learning provides advice on all aspects of a school or college's online safety arrangements

h) Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq

i) UK Council for Internet Safety have provided advice on sexting-in-schools-and-colleges and using external-visitors-to-support-online-safety-education

j) Remote education, virtual lessons and live streaming

k) Case studies on remote education practice are available for schools to learn from each other

l) Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely

m) London Grid for Learning guidance, including platform-specific advice

n) National cybersecurity centre guidance on choosing, configuring and deploying video conferencing

o) National cybersecurity centre guidance on how to set up and use video conferencing 23

p) UK Safer Internet Centre guidance on safe remote learning

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Support for children

Children are made aware that they can always contact a member of the safeguarding team at the Academy to discuss any concerns via the Academy office – 0115 9151271

    c)   Childline for free and confidential advice

    d)   UK Safer Internet Centre to report and remove harmful online content

    e)   CEOP for advice on making a report about online abuse

Parent Support

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

    a)   Common sense media provide independent reviews, age ratings, & other information about all types of media for children and their parent/carers

    b)   Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying

    c)   Government advice about security and privacy settings, blocking unsuitable content, and parental controls

    d)   Internet Matters provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world

    e)   Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation

    f)   London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary-aged children safe online

    g)   Lucy Faithfull Foundation StopItNow resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)

    h)   National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online

    i)   Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games

    j)   Parentzone provides help for parents and carers on how to keep their children safe online

    k)   Parent info from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations

    l)   UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online

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Appendix 4 – Role of the DSL

Role of the Designated Safeguarding Lead

The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL must be a member of the senior leadership team.

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 designated safeguarding lead should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

The DSL should understand when they should consider calling the Police and what to expect when they do.

During term time, the DSL should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.

The DSL should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training as set out above, their knowledge and skills should be updated (for example via ebulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

Deputy Designated Safeguarding Leads

The Deputy Designated Safeguarding Leads should be trained to the same standard as the Designated Safeguarding Lead and the role should be explicit in their job description. The deputy (or multiple deputies) must be able to perform the role of the DSL in the absence of the DSL.

The job descriptions can be found below for both DSL and DDSL.

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Job description Designated Safeguarding Lead

JOB TITLE: Designated Safeguarding Lead (DSL)

LOCATION: Based at the academy

REPORTING TO: The Director of Education

CONTRACT: Permanent. Full time.

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL will have a leadership position in the academy. They will be given the time, funding, training, resources, and support to provide advice and support to other staff on child welfare and child protection matters, to take 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.

Key Accountabilities:

Manage referrals.

The Designated Safeguarding Lead will:

- Refer cases of suspected abuse to the local authority children's social care as required.

- Support staff who make referrals to local authority children's social care.

- Refer cases to the Channel programme where there is a radicalisation concern.

- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and to the local authority's designated officer.

- Refer cases where a crime may have been committed to the Police.

Work with others.

The Designated Safeguarding Lead will:

- Liaise with the Raleigh Education Trust safeguarding lead to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations.

- As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.

- Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and

- Act as a source of support, advice, and expertise for all staff.

- Link closely with the three local safeguarding partners.

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Training

The Designated Safeguarding Lead will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead will undertake Prevent awareness training.

The DSL will keep up-to-date with latest information about safeguarding so that their knowledge and skills are refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments).

The DSL will:

- 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.

- have a working knowledge of how local authorities 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.

- ensure each member of staff has access to, and understands, the academy child protection policy and procedures, especially new and part time staff.

- be alert to the specific needs of children in need, those with special educational needs and young carers.

- can keep detailed, accurate, secure written records of concerns and referrals.

- understand and support the academy with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation.

- 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.

- have an overview of the filtering arrangements across the academy and be responsible for the monitoring arrangements for online safety.

- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.

- obtain access to resources and attend any relevant or refresher training courses; and

- 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 the academic/pastoral progress of all children who need a social worker by ensuring regular reviews of their holistic progress.

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Raise Awareness

The Designated Safeguarding Lead will:

- ensure the academy child protection policy is known, understood and used appropriately and is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, working with the Trust Safeguarding lead.

- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the academy.

- link with the Local Safeguarding Partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

- provide appropriate reports and information to the academy and the trust.

Child Protection File

The DSL, where children leave the academy, will ensure their child protection file is transferred to the new school or college within 5 days. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained (if CPOMS is not the tool for transfer). Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEND in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the Designated Safeguarding Lead should always be available (during academy hours) for staff in the academy to discuss any safeguarding concerns.

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Job Description Deputy Designated Safeguarding Lead:

JOB DESCRIPTION

JOB TITLE: Deputy Designated Safeguarding Lead (DDSL)

LOCATION: Based at the academy

REPORTING TO: The DSL and the Principal

The Deputy Designated Safeguarding Lead will support the DSL to safeguard and protect children (including online safety). The DDSL will be given the time, funding, training, resources, and support to provide advice and support to other staff on child welfare and child protection matters, to take 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.

Key Accountabilities:

Manage referrals.

The deputy designated safeguarding lead will when the DSL is unavailable or out of the academy:

- refer cases of suspected abuse to the local authority children's social care as required.

- support staff who make referrals to local authority children's social care.

- refer cases to the Channel programme where there is a radicalisation concern.

- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and to the local authority's designated officer;

- refer cases where a crime may have been committed to the Police.

Work with others

The deputy designated safeguarding lead will support the DSL to:

- liaise with the Headteacher to inform her/him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations.

- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.

- liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and

- act as a source of support, advice, and expertise for all staff.

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Training

The deputy designated safeguarding lead will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The deputy designated safeguarding lead will undertake Prevent awareness training.

The DDSL will keep up-to-date with latest information about safeguarding so that their knowledge and skills are refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments).

The DDSL will:

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.

have a working knowledge of how local authorities 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.

ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff.

are alert to the specific needs of children in need, those with special educational needs and young carers.

can keep detailed, accurate, secure written records of concerns and referrals.

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Appendix 5 - Online Safeguarding/ Filtering and Reporting

The Raleigh Education Trust has deployed Smoothwall as the border firewalls and internet filtering and safeguarding solution for the staff and learners for protection of their online digital learning environment. This provides real-time, content-aware, and granular filtering control of all users and devices. A baseline 'block' list of categories has been pre-defined by the Trust and implemented across all schools and does vary between staff users and student users.

The following details are based on the initial deployment of Smoothwall across the schools, and both the filtering and reporting will be developed and enhanced through usage and feedback from the schools and safeguarding leads as the systems become further established to meet your teaching and learning needs.

There are a wealth of reports and logging features available, but the safeguarding elements are summarised in this document:

Immediate Safeguard Reporting:

Should an online activity trigger one of the pre-determined categories:

Abuse, Adult content, Bullying, Criminal activity, Radicalisation, Substance abuse and suicide.

The nominated safeguarding lead (Table 1) will receive an email notification (Fig 1) as an example of this. The nominated safeguarding lead will only receive notifications for users associated with their school.

Ambleside Academy	Denewood Academy Unity Academy	Westbury Academy	Woodlands Academy
Joanne Barstow	Michelle Gull	Dan Siddons	Joanne Doidge
Louise Marsh	Rebecca Jones	Ki Addis	Polly Smith

Table 1

The notification gives a baseline for further in-depth analysis if required of the user's browsing history. It is important to be aware that a trigger does not mean the user was explicitly searching for the content.

When multiple breaches occur against the same user and ruleset, and instant alert is only sent every ten minutes, so as not to bombard the safeguarding leads with message.

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Reporting:

Smoothwall logs all internet activity, and these logs are identifiable to the individual user. Many reports can be generated (examples below – Table 2), these are currently on request and are being developed to allow wider access to these logs from any authorised user, from any location.

- Specific User or User Group
- Date / Time
- General Activity / Specific Categories or Specific URL

To simplify the understanding of users activities online activity, the traffic is categorised by Smoothwall into pre-defined, recognisable category names. (See Table 2 for full category list).

Colwyn have configured the Smoothwall Cloud filter as per section 136 in the KCSIE Statutory guidance for schools and colleges released on 1 September 2023, addressing the following categories:

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

Figure 2 below shows examples of the test reports from testfiltering.com. This confirms compliance with the DFE's filtering and monitoring standards in schools (March 2023).

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Figure 1:

From: noreply@smoothwall.com <noreply@smoothwall.com>
Sent: 31 August 2023 5:00 PM
To: Safe Guarding Lead <safeguardinglead@school.co.uk>
Subject: New Safeguarding Alerts for studentuser@school.co.uk

smoothwall®
by Qoria

1 Safeguarding Alerts have been created for the user studentuser@school.co.uk. All of the individual alerts have been bundled together for you to view in the Alert Details section.

User Details:

Username: studentuser@school.co.uk

Local Groups: Trust - School Student Users

Serial Number: XXX111XXX111XXX

Tenant Name: XXX Academy

Tenant ID: 01180f6b-00e7-437b-91b8-9cd7528ff174

Alert Details:

Date/time: Thu Aug 31 2023 16:51:47 GMT+0100 (British Summer Time)
Theme: Adult content
Level: 7
Blocked: True
Search terms:
URL: https://sex.com/
Categories: Adult Sites,Pornography

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Figure 2:

Figure 3:

✅ **Blocked**

Description
Tests whether you are blocking websites on the IWF Child Abuse
Content URL list.

Results & Recommendations
It appears that your filtering solution includes the IWF URL Filter list,
blocking access to Child Sexual Abuse content online

Terrorism Content

✅ **Blocked**

Description
Tests whether you are blocking websites on the Counter-Terrorism
Internet Referral Unit list (CTIRU).

Results & Recommendations
It appears that your filtering solution includes the Counter-Terrorism
Internet Referral Unit (CTIRU) URL filter list, blocking access to unlawful
terrorist content online

Adult Content

✅ **Blocked**

Description
Test whether your Internet filter blocks access to pornography websites

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Figure 4:

Results & Recommendations
It appears that your filtering solution includes blocking for online pornography

Offensive Language

✓ **Blocked**

Description
Accesses a page containing offensive language to test if your filtering software blocks it

Results & Recommendations
It appears that your filtering solution includes blocking for offensive language

Terms | Privacy | Cookies | Sign In

UK Safer Internet Centre   SWGfL Safe, Secure, Online

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Table 2 – Category List (Subject to change).

Name	Example URL	Description
Legal & Liability Issues		Sites which could cause legal or liability issues
Child Abuse		Child abuse keywords contributed by the IWF
Drugs	www.weedguru.com	Sites pertaining to the sale, manufacture, promotion or use of recreational and prescription drugs
Intolerance	www.stormfront.org	Sites related to or promoting intolerance of any kind
Piracy and Copyright Infringement		Sites containing pirated copyrighted material for illegal download or streaming
Self Harm	www.sanctioned-suicide.org	Sites relating to self-harm, suicide and eating disorders
Pornography	www.pornhub.com	Sites dedicated to Pornographic content, whether audio/visual or textual
Terrorism		Sites provided by the Office of Security and Counter-Terrorism branch of the UK Home Office, containing pro-terrorism material
Violence	www.hockeyfights.com	Sites dedicated to violence, whether this is through sport or bullying
Adult Themes		Sites which may be unsuitable for a younger audience.
Abortion	optionsforabortions.com	Sites which refer to abortion, including "pro-life" and "pro-choice".
Adult entertainers		Use in conjunction with search term filtering to prevent pornographic web searches.
Adult Sites	www.urbandictionary.com	Content which is primarily adult in nature, content such as bad language or adult jokes, but not pornography.
Alcohol and Tobacco	www.guinness.com/	Sites pertaining to the use, sale, production and promotion of alcoholic drinks and tobacco (including e-cigarettes)
Body piercing and Tattoos	www.tattoos.com	Sites which promote, sell, advertise or discuss any body modification such as piercing and tattoos.
Criminal Activity	www.myfakeid.biz	Sites providing either instruction or tools facilitating illegal activity, such as lock picking, fake IDs and fraud.
Fireworks	www.fireworks.us	Purchase and manufacture of fireworks & pyrotechnic devices

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Gambling	www.888.com	Sites providing gambling and gambling related services, casino's, sports betting etc..
Gore		Sites describing or displaying gory content.
Inappropriate/Vulgar Search Terms		Contains lists of Inappropriate/Vulgar/Swear words, only search terms, no content or URLs
Naturism and Nudism	www.clothesfree.com	Sites that contain nudist pictures and/or promote a nudist lifestyle
Non-pornographic Nudity	parkerpfister.com	Sites containing nudity that is not pornographic, e.g artistic nudity
Provocative Images	www.yummylook.com	Sites which contain pictures of intimate, alluring, revealing attire or other types of suggestive clothing, such as lingerie and swimsuits.
Restricted to Adults	www.rtalabel.org	Category containing the "Restricted to Adults" special tag; see http://www.asacp.org/
Sexuality Sites	www.lovepanky.com	Content based primarily on sexuality which may be unsuitable for a younger audience.
Weapons : Hunting and Sporting	www.thehuntinglife.com	Hunting and target shooting weapons.
Weapons : Military	www.nps.gov/spar	Sites describing weapons of war, including those in a historical context.
Weapons : Personal Weapons	www.gunsite.com	Sites discussing and/or selling of weapons, including firearms, blades, explosives and incendiaries.
Business and Corporate		Businesses and organisations, including government and non-profits.
Agriculture	masseyferguson.com	Sites related to agriculture - Machinery, livestock, crops
Business and Corporate	www.abc.xyz	Sites for businesses and commercial organisations, where the organisation provides paid for goods or services.
Charity and Non-profit	www.christianaid.org.uk	Charity and non-profit organisations
Crowdfunding	patreon.com	URLs of sites that their primary business is to raise capital for a project or venture via crowdfunding
Government	www.gov.uk	Government websites and websites related to governmental organisations
Household Utilities	www.britishgas.co.uk	Gas/Water/Electricity utilities websites, including phone & Internet
Law	www.lawsociety.org.uk	Lawyer/Solicitor/Barrister websites, law societies and sites whose whole theme is Law

Travel and Transport Services	www.nationalrail.co.uk	Information or booking sites related to transportation such as trains, taxis, or airlines
Entertainment		Entertainment, sport and online games
Books	www.lrb.co.uk	Sites selling, reviewing or discussing books or audio books in any format
Celebrity	www.perezhilton.com	Sites relating to any celebrity media, fan sites or news
Computer Games	www.ign.com	Sites related to computer games but not in browser playable games
Desktop Customisation	www.screensavers.com	Sites providing screen savers, wallpapers, desktop themes and similar content
Events	www.chicagothemusical.com	Sites that promote and discuss live events e.g. live dramatic/theatrical productions and festivals
Graphic novels	www.tokyopop.com	Graphic novels, Manga, Anime, and other illustrated works, excluding Hentai as this is Pornography
Jokes and Humour	www.ajokeaday.com	Sites dedicated to humour, including jokes, video, amusing images and satire
Magazines	www.horsemagazine.com	Sites selling, reviewing or discussing magazine content, printed or online
Movies and Film	www.imdb.com	Movie sites, reviews and discussion
Museums and Art galleries	www.vam.ac.uk	Sites that promote, exhibit, and/or display works of art or objects of historical and or cultural significance
Music	www.lyrics.com	Sites that discuss, promote/market and distribute music. Including fan sites, lyrics sites, playlist sites, artist and musical subjects sites
Online Games	www.miniclip.com	Sites providing games that can be played in a browser
Radio and TV	www.radiotimes.com	Non-news related radio and television, including radio streaming sites
Sport	www.eurosport.co.uk	Sites discussing or promoting any sport, including sports team homepages
File and Image Hosting		Sites which provide file hosting services.
File Hosting	www.mega.io	Sites that offer online file storage services on remote servers for backup or exchange purposes
Image Hosting: Moderated	www.photobucket.com	Sites that provide image/gif hosting services that are vetted or controlled with a conditions of use policy or moderated by humans
Image Hosting: Unmoderated	www.imgur.com	Sites that provide image/gif hosting services that include potentially

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		pornographic or otherwise offensive content
Finance		Finance related sites, including banks and other financial service providers.
Cryptocurrency	www.bitfinex.com	Cryptocurrency websites
Financial Services	www.hsbc.com	Finance sites including investment advice, but not Online Banking portals
Online Banking	www.onlinebanking.natwest.com	Sites providing online banking access, or online credit card management
Payday Loans	www.cashasap.co.uk	Online providers of "Payday Loans"; short term cash loans typically with high rates of interest
IT & Technical		Sites relating to computing, technology and the Internet.
Collaboration Software	www.lucidchart.com	Sites that allow collaboration on documents/projects via shared link/software
Computing	www.slashdot.org	Sites related to computing but not games. e.g programming languages
DNS over HTTPS	dns.google	Subdomains/URLs used to facilitate the use of DNS over HTTPS
Games Consoles	www.playstation.com	Sites that provide authentication for, and content used in, games consoles
Microsoft Office 365	www.office.com	Domains required for Microsoft Office 365 to function. Warning: Includes live.com, msn.com and outlook.com
Mobile Apps : ClassDojo App	www.classdojo.com	URLs used by the ClassDojo App
Mobile Apps : Covid-19 Exposure Notification Apps		Mobile applications developed by public health authorities which use the Covid-19 Exposure Notification System developed by Google and Apple
Mobile Apps : Emile Education	https://emile-education.com	
Mobile Apps : Facebook App	www.facebook.com	URLs used by the Facebook Mobile App
Mobile Apps : Snapchat App	www.snapchat.com	URLs used by the Snapchat Mobile App
Mobile Apps : TikTok APP	tiktok.com	Domains and URLs used by the TikTok Android and iOS mobile application
Mobile Apps : Twitter App	www.twitter.com	URLs used by the Twitter Mobile App
Mobile Apps : WhatsApp	whatsapp.com	Used to allow or block the WhatsApp mobile application
Mobile/Cell Phones	www.o2.co.uk	Sites providing content about mobile/cell phones, reviews, ratings, providers etc...

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Peer-to-peer Networking	www.1337x.to	Peer-to-peer network sites
Remote Desktop	www.teamviewer.com	Sites offering remote desktop and remote administration software tools
Software : Adobe Creative Cloud		URLs/IPs necessary for Adobe Creative Cloud to function properly
Software : AEM Web Portal		IP and URLs that are used by AEM (Autotask Endpoint Management)
Software : Google Drive	drive.google.com	URLs used by Google Drive/Docs/Sheets/Slides
Software : Google Meet	meet.google.com	Domains and URLs used by Google Meet
Software : GoTo Software Suite	www.gotomypc.com	Contains URLs for GoTo products (GoToMeeting, GoToWebinar, GoToTraining, GoToAssist, GoToMyPC, and OpenVoice)
Software : Hudl App	www.hudl.com	Domains/URLs used by the sports APP Hudl
Software : Lightspeed MDM	lsmdm.com	Domains and URLs used by Lightspeed's Mobile Device Management software
Software : Loom	loom.com	URLs necessary for Loom Screen Recording Software to work
Software : Senso		Doamins used by the Senso platform
Software : Skype	www.skype.com	Domains and IPs that are used by Skype
Software : youHQ	https://www.youhq.co.uk	Domains, URLs, and YouTube videos used by the youHQ school wellbeing platform.
Software : Zoom	www.zoom.us	List of URLs & IPs provided by Zoom's KB article
Web hosting	www.godaddy.com	Sites which offer domain names and web hosting services
Webmail	mail.google.com	Sites dedicated to email/webmail
What's my IP services	www.myip.com	Sites and services which display your public IP address
Information and Reference		Informational sites and reference materials
Academic institutions	www.harvard.edu	Sites of schools, universities, colleges and other learning centres
AI Tools	openai.com	General AI (AGI) tools are a set of software and technology that aims to simulate or replicate human-like intelligence across a wide range of tasks. These tools are designed to be flexible, adaptable and able to learn and improve on their own. They can be used for autonomous vehicles, chatbots, and virtual assistants. Examples

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		include machine learning frameworks, NLP libraries and deep learning architectures.
Education and Reference	www.sparknotes.com	Sites that provide materials and information that aid in learning
Mapping	google.com/maps	Sites which provide geographical mapping services including those that promote or provide opportunity for travel planning
News	www.bbc.co.uk/news	Sites whose primary aim is to present local, national, or international news, or news relating to a specific topic.
Plagiarism	www.ukessays.com	Sites offering paid help and/or pre-written homework material for students
Politics	labour.org.uk	Sites belonging to a Political party or wholly political based sites
Sex Education	www.sexeducationforum.org.uk	Educational sites relating to sexual activity including reproduction, contraception and safe sex
Translation	translate.google.com	Sites which provide translation services, such as blocks of text or providing entire site translation
Weather	www.weather.org	Sites dedicated to weather information and forecasts
Wikipedia: Editing		Block this category to deny Wikipedia changes and Wikipedia logins.
Lifestyle		Various inoffensive yet non-work-related sites
Clothing & Accessories	www.tiffany.com	Sites selling, promoting and discussing clothing, shoes, jewellery and fashion
Food and Dining	www.snackworks.com	Sites relating to food reviews, recipes, restaurants and catering
Gardening	www.crocus.co.uk	Sites dedicated to gardening as a hobby, selling gardening products or reviewing gardening methods/techniques
Health and Fitness	puregym.com	Sites dedicated to health and fitness, gyms, fitness blogs, health sites
Household and DIY	www.diynot.com	Sites dedicated to to DIY projects, tools and household content
Online Auctions	www.ebay.co.uk	Online auction sites where auction style sales are carried
Online Shopping	www.sainsburys.co.uk	Sites where purchases can be made, of any kind
Parenting and Baby	www.mamasandpapas.com	Sites providing information or products for parenting, pregnancy, babies and infants

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Pets	www.petsathome.com	Sites selling or discussing pets or pet related goods
Real estate and Property	www.realtor.com	Sites that discuss, promote/market and provide information on renting, buying, or selling real estate or properties
Religion	www.newchristian.com	Sites where the main theme/content is religion
Time-wasting	www.isitchristmas.com	Unproductive sites popular with children
Toys and Games	www.thetoyshop.com	Sites which promote, discuss and sell toys and games
Vacations	www.kayak.co.uk	Sites related to travel and holidays
Vehicles and Motoring	www.harley-davidson.com	Sites which advertise, promote, discuss and offer information on vehicles and automobiles
Wedding	www.weddingplanner.co.uk	Sites discussing weddings or selling wedding related items or services
Malware and Hacking		Hacking, warez and phishing sites, including sites containing information on how to bypass web filters
Hacking	www.kitploit.com	Sites with the main theme of hacking/cracking, regardless of "whitehat" or "black-hat"
Internationalised Domain Names	www.xn--strmsel-c1a.se	Domains that include non-ASCII characters which are translated to punycode
Malware and Phishing		Sites hosting viruses, malware, adware, spyware or trojans
Web Proxies	www.proxysite.com	Web proxy sites and other tools designed to circumvent filtering
Medical	www.nhs.uk	Medical and childcare sites
Medical Information	www.nhs.uk	Sites containing content about health and medical matters
Multimedia		Audio/video, radio, peer-to-peer and other multimedia sites
Amazon Prime	www.amazon.com/PrimeVideo	Amazon Prime instant video and Amazon Prime music
Audio and Video	www.vimeo.com	Sites providing audio or video downloads or streaming
BBC iPlayer	www.bbc.co.uk/iplayer	Domains andURLs for the BBC iPlayer service
Disney+	disneyplus.com	Sites used by Disney's streaming service Disney+ (DisneyPlus)
iTunes	www.apple.com/itunes	Domains and URLs for Apple's iTunes service

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ITV Player	www.itv.com/hub/itv	Domains and URLs for the ITV Player service
Live Streaming	www.livestream.com	Domains and URLs that stream live video
Netflix	www.netflix.com	Domains and URLs for Netflix
Spotify	spotify.com	Domains and URLs used by the Spotify client and Web app
Vimeo	vimeo.com	URLs used by Vimeo, to be used with Force Mature content filter content modification
YouTube	www.youtube.com	Domains and URLs for YouTube
YouTube Allowed Videos and Playlists		Allowed YouTube video and playlist IDs
YouTube HD streaming		Domains and URLs for high definition streams from YouTube
Search Engines		Search Engines
Google Instant Previews		Thumbnail previews of Google web search results
Google Search		URLs used by the Google search engine
Image Search	images.google.co.uk	URLs used for image search
Job Search	www.monster.com	Sites for job search
Question & Answer	www.wikihow.com	How To, instructional and Q&A sites
Reverse Image Search	www.tineye.com	Reverse image search engines which offer query-by-image and image similarity functions
Search Suggestions		Disables automatic search suggestions on Google, Bing, Ask and YouTube search engines
Secure Search	www.google.com	SSL encrypted search services
Web Search	www.google.com	Sites providing web search functionality
Web Search POST		Search engines that use the body of POST requests to contain search terms
Social Media		Social networking, dating and chat sites
Blogs	www.blogspot.com	Sites hosting blog content of any kind
Dating and Companionship Sites	www.match.com	Domains and URLs that provide dating and companionship services
Discussion Forums	www.edugeek.net/forums	Sites dedicated to discussion forums, e.g. phpBB
Facebook	www.facebook.com	Domains and URLs for the Facebook network

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Facebook: Posts & Updates		Block this category to deny Facebook changes such as posts, comments, likes, uploading of photos, videos or notes. Requires HTTPS interception
Instagram	instagram.com	URLs used by Instagram
Instant Messaging VoIP and Web Conferencing	www.trillian.im	Sites which contain messenger clients and web-based messaging sites, as well as any form of Voice over IP based chat service
Social Networking Sites	www.facebook.com	Social Networking sites
Twitter: Updates		Block this category to deny Twitter changes such as tweets, retweets, follows, posting of photos, videos or account changes. Requires HTTPS interception
Web Infrastructure		Web infrastructure and miscellaneous domains.
Adverts	ads.whatsonstage.com	Advert servers and advert URLs
APIs & Web Libraries	api.twitter.com	Domains and URLs used by APIs and web libraries
Connect for Chromebooks	googleusercontent.com	Domains and URLs used for Google's service Connect for Chromebooks
Content Delivery	www.akamai.com	Content Delivery Networks and supplementary infrastructure servers for various existing sites
Internet Speed Tests	www.speedtest.net	Public web services used to measure the speed of an internet connection
Parked Domains	sedoparking.com	Inactive web domains "parked" by a registrar, advertiser or domain owner
Smoothwall Products		This category contains the Domains that the Smoothwall Suite uses.
Software Updates	windowsupdate.microsoft.com	Domains used to download software updates
SSL / CRL	crl.verisign.com	Support domains for SSL services including Certificate Authorities, Certificate Revocation Lists, OCSP and Extended Validation servers
Transparent HTTPS incompatible sites		Sites used by clients which do not support HTTPS server name indication (SNI)
URL Shortening	bit.ly	Sites which provide a URL shortening and forwarding / link service
User tracking and Site stats	doubleclick.net	Sites known to track visitor statistics for analytics and reporting purposes

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Appendix 6: Safeguarding checklist

The checklist below is completed annually (often during the Autumn term) at all offsite education providers by one of the Trust quality assurance team. This member of the team will also be either a named DSL at one of the Trust Academies or DSL trained.

Safeguarding monitoring checks for education providers

Provider:	Person responsible for the QA:
Owned by:	Head of provision:
Visit report by:	Date of visit:
Type of provision: Independent AP Free School Alternative Provision	DfE number:
Number of young people attending your provision Total: Part-time: Full-time:	Appropriate Ofsted registration documents including copy of most recent inspection:
Date of last Ofsted report or QA report:	Outcome of last Ofsted or QA report:

Criteria	Outcome	Comments / Actions
Safer recruitment		
Who checks the SCR?	Name:	
Has the auditor seen the SCR?	Yes	
What does it include?	Enhanced DBS with barred check list Date of last DBS	

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	Identity check	
	Reference checks	
	Prohibition check	
	Overseas checks	
	Right to work in the UK	
Are supply / volunteers included on the SCR on their first day of work?	Yes / No	
Have there been any new members of staff since the last visit?	Yes / No How many? Are they on the SCR?	
Is there a safer recruitment policy in place?	Yes / No Last update:	
Have relevant staff received safer recruitment training	Yes / No Last update:	
Child Protection / Safeguarding Policies and Procedures		
Is there a Child Protection policy in place?	Yes / No Last update:	
Is there a vulnerable children's list?	Yes / No Last update:	
Describe safeguarding procedures?		
Has the auditor seen an example of these procedures in place / in action?	Yes / No	

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Has the auditor seen an attendance policy?	Yes / No Date:	
What are the protocols for first day of absence? Ie, what happens when a pupil does not arrive? Who do they speak to? When do they follow this up? Are pupils with social workers notified of absence?		

Governance, DSLs and named people

Has a person on the supervisory body of the provider been nominated to take responsibility for ensuring that the Provision discharges its duty in relation to safeguarding	Yes / No	
Who is this person?	Name:	
Has the auditor spoke to this person about how they monitor safeguarding practices in the AP?	Yes / No	
Has this person received safeguarding training?	Yes / No Date:	
Who is the Designated Safeguarding Lead?	Name:	
When was the Designated Safeguarding Lead last trained?	Date:	
What is their role in the organisation?	Role:	
Has evidence of appropriate training been seen and in date?	Yes / No Date:	

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Are details of the DSL/safeguarding team on display?	Yes / No	
Are DSL details on a safeguarding noticeboard?	Yes / No	
Is there more than 1 trained DSL? When did they last have training? Is this in date?	Yes / No Name: Role: Training date: Name: Role:	
Who is the designated person for Children Looked After?	Name: Contact details: Training date:	
Who is the designated person for SEN	Name: Trained SENCO? Contact details: Training date:	
Who is the E-safety lead?	Name: Training date:	
Who is the Prevent Lead?	Name:	
Who writes or keeps up to date risk assessments on individual pupils?	Name:	
Has the auditor seen evidence of these risk assessments?	Yes / No Last updated:	

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Is there a staff training log	Yes / No Last updated:	
What was the staff CPD offer last academic year?	Please describe;	
Other aspects of safeguarding		
Has the auditor seen evidence of recent PREVENT training?	Yes / No Date:	
Has auditor seen evidence of recent FGM training?	Yes / No Date:	
Has the auditor seen evidence of appropriate filtering and monitoring systems on computers pupils use?	Yes / No Type of system:	
Are pupils taught how to keep themselves safe online?	Yes / No Describe:	
Who is the nominated Data Protection Officer?	Name: Date of training:	
Do you complete home visits?	Yes / No	
Evidence of Pupil registers completed AM & PM	Yes / No	

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Evidence of paperwork for off site visits	Yes / No	
Within the past 12 months, have any referrals to LADO been made?	Yes / No Date: Outcome:	
Have all staff read KCSIE 2023 Part 1	Yes / No Evidence seen:	
Is there a safeguarding section on your website?	Yes / No Evidence seen:	
Audit		
Has the provider conducted/been subject to a safeguarding audit?	Yes / No	
Date of last safeguarding audit?		
Has this been seen?		
Have audit actions taken place and in a timely manner?		
Non DSL staff		
Has the auditor spoken to more than 1 member of staff about safeguarding practices? Can they describe procedures? Do they know	Yes / No How many staff?	

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who their DSL is? Do these procedures match up with what DSL's say?		
First aid / Fire / Medicines		
How many first aiders are on-site?	Number: Training date:	
Has the auditor seen a policy in place?	Yes / No	
Does the AP administer medication on site?	Yes / No	
Has the auditor seen than CD medicines are locked away in an appropriate cupboard?	Yes / No	
Has the auditor seen that administration of medication paperwork is relevant and up-to-date?	Name of pupil(s) Time taken Who delivered the medication Dosage Name of medication Adverse reactions Date	
When was your last fire drill?	Date: Record	

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