



Child Protection and Safeguarding Policy 2021-2022

Document provenance

This policy was approved by Trustees as follows –

Approver: Board of Trustees

Date ratified: 14th September 2021

Executive Leadership Team (ELT) Owner:

Date of Review: August 2022

Chief Executive Officer (CEO)

Unless there are legislative or regulatory changes in the interim, this policy will be reviewed annually. Should no substantive changes be required at that point, the policy will move to the next review cycle.

Summary of changes at last review:

- Changes to reflect the new Keeping Children Safe in Education (KCSIE) Department for Education (DfE, September 2021):
 - Part 1 & Annex B is now the requirement for reading for all staff – Annex A provides a condensed version of Part 1 for staff who do not work directly with children on a regular basis.
 - Inclusion of ‘commerce’ as a category of online safety risk (i.e. online gambling).
 - Confirmation of annual academy online safety review.
 - Updated examples of peer on peer/child on child abuse.
 - Reinforced statement that staff will make sure victims know they are being taken seriously and not feel ashamed for creating a problem or reporting, whilst the wishes of the victim is an important consideration.
 - Updated examples of sexual harassment in line with 2021 advice.
 - Inclusion of link to UKCIS advice on ‘Sharing nudes and semi-nudes’.
 - Additional risk factors included within serious youth violence.
 - Emphasis on MH concern linked to safeguarding concern resulting in immediate action.
 - CCE acknowledgement: Experiences of girls and boys.
 - Inclusion of elective home education (EHE) as a vulnerability and the E-ACT process including a parental meeting following an EHE request.
 - Reference to job title not being the determining factor for S128 check of a ‘management’ position.
 - Appendix 3: Terminology update to include low level concerns for allegations against staff that do not meet the harm threshold. Inclusion of process for low level concerns.
 - Inclusion of specific reference to modern slavery (and the National Referral Mechanism), child abduction and community safety incidents and cybercrime (all now included in KCSIE 2021 Annex B).
 - Reference to the Domestic Abuse Act 2021 and the fact that children are victims in

their own right if they see, hear or experience the effects of abuse.

- Additions to DSL role: Lead on social-worker children (SWC), encourage listening culture and sharing safeguarding file within 5 days of a pupil transfer.

- 1 now includes the emphasis on a safeguarding culture.
- Amended related guidance updates as required.
- Removal of COVID-19 sections (3.5 and 15).
- 5.43 amended in acknowledgement of our continued adherence to advice from the DfE about online safety where children are being asked to learn online at home.
- Filtering and monitoring section moved to after 'Online Safety' for flow.
- 14 amended to reflect roles of CEO, National Safeguarding Director and Regional Safeguarding Leads.
- Clarity that decisions about sexual violence and harassment are made on a case by case basis through the DSL and with support from Social Care/Police as required.
- Inclusion of children missing education (CME) as a vulnerability.
- Inclusion of children accessing alternative provision (AP) as a vulnerability.
- Weekly welfare check completed for any pupil who is absent for 5 consecutive days regardless of the reason for absence.
- Specific reference to staff being aware of the specific needs and additional safeguarding risks for vulnerable groups (including SEND and social-worker children (SWC)).
- Reference to the 'Staff Safeguarding CPD Plan' being followed for all staff safeguarding training.
- Reference to pupil awareness through the academy personal development curriculum.
- Appendix 2: Update to remove reference to EEA for living or working outside the UK and risk assessment implementation. Update in relation to barred list checks for specific roles. Assessment of visitors from external organisations (i.e. educational value/age appropriateness).
- Appendix 3: Dated flow charts amended with brief written process.

Related policies:

- Acceptable Use of Mobile Phones Policy
- Behaviour, Anti-Bullying and Exclusions Policy
- Whistleblowing Policy
- Staff Code of Conduct Policy
- Complaints and Concerns Policy
- Health and Safety Policy
- Attendance Policy
- Online Safety Policy
- Social Media Policy
- Relationships Sex & Health Education Policy (Primary or Secondary)
- Supporting Students with Medical Needs Policy
- Pupil Mental Health and Wellbeing Policy
- Information and Records Retention Policy
- SCR and Safer Recruitment Policy

The appendices are based on the Department for Education (DfE 2021) statutory guidance, *Keeping Children Safe in Education*:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Related Guidance:

- [Alternative provision \(2013; Updated 2016\)](#)
- [Behaviour and discipline in schools \(2016; Updated 2020\)](#)
- [Children Missing Education \(2016\)](#)
- [Counter-terrorism strategy \(CONTEST\) \(2018; Updated 2018\)](#)
- [Data protection: a toolkit for schools \(2018; Updated 2018\)](#)
- [Designated teacher for looked after children \(2018\)](#)
- [Disqualification under the Childcare Act 2006 \(2018\)](#)
- [Education for children with health needs who cannot attend school \(2013\)](#)
- [Exclusion from maintained schools, academies and pupil referral units in England \(2017; Updated 2021\)](#)
- [Guidance for Safer Working practice for Adults who work with Children and Young People in Education \(2019\)](#)
- [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(2018\)](#)
- [Listening to and involving children and young people \(2014\)](#)
- [Mandatory Reporting of Female Genital Mutilation – procedural information \(2015; Updated 2020\)](#)

- [Modern Slavery: how to identify and support victims \(2020; Updated 2021\)](#)
- [Multi-Agency statutory guidance on female genital mutilation \(2016; Updated 2020\)](#)
- [Prevent Duty Guidance for England and Wales \(2015; Updated 2021\)](#)
- [Preventing and tackling bullying \(2013; Updated 2017\)](#)
- [Promoting the education of looked-after children \(2014; Updated 2018\)](#)
- [Relationships Education, Relationships and Sex Education, and Health Education in England \(2019; Updated 2020\)](#)
- [Safeguarding children and protecting professionals in early years settings: online safety considerations \(2019\)](#)
- [School Admissions Code \(2021\)](#)
- [School attendance: guidance for schools \(2020; Updated 2021\)](#)
- [School attendance: parental responsibility measures \(2015; Updated 2020\)](#)
- [School complaints procedures: guidance for schools \(2020; Updated 2021\)](#)
- [Searching, Screening and Confiscation at School \(2018\)](#)
- [SEND code of practice: 0 to 25 years \(2015; Updated 2020\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges \(2021\)](#)
- [Supervision of activity with children \(2012\)](#)
- [Supporting pupils at school with medical conditions \(2015; Updated 2017\)](#)
- [Teaching online safety in schools \(2019\)](#)
- [The Equality Act 2010: advice for schools \(2014; Updated 2018\)](#)
- [The Teachers' Standards \(2011; Updated 2021\)](#)
- [UKCIS: Sharing of nudes and semi-nudes \(2020\)](#)
- [Use of Reasonable Force in Schools \(2013\)](#)
- [What to do if you're worried a child is being abused: advice for practitioners \(2015\)](#)
- [Working Together to Safeguard Children \(2018; Updated 2020\)](#)

Academic Year: 2021-2022

Academy Name:	E-ACT Parker Academy
Designated Safeguarding Lead (DSL): Single Point of Contact (SPOC):	Harry Barrett (Assistant Head i/c Safeguarding) Ben Jones (PPG Lead; Extended Leadership Team)
Deputy Safeguarding Lead/s (DDSL):	Tracy Morris Kerran Hanna
Other Safeguarding Team:	Simon Cox (Executive Head) Andrea White (Associate Head) Emma Butler (Assistant Head i/c Inclusion) Louise Townsend (Head of Year 8; Wellbeing lead; E-Safety lead) Dawn Latham (Attendance lead) Courtneu Boxell (CiC Lead) Sarah Grist (SEMH provision lead)
Regional Safeguarding Lead:	Owen Walters
Regional Education Director:	Simon Cox
Date:	14th September 2021

Child Protection and Safeguarding Policy

Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse 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.

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

Children includes everyone under the age of 18¹.

¹ Please refer to our Scope statement item 2.2

1. Introduction and Purpose

1.1. We are committed to safeguarding children and we expect all staff and visitors to the academy to share this commitment. We will always act in the best interest of the child.

1.2. The academy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of, and understand fully their statutory responsibilities with respect to safeguarding
- Staff are effectively trained in recognising and reporting safeguarding issues as part of our culture of vigilance.
- A whole school approach to safeguarding (i.e. safeguarding culture) is clear and that safeguarding underpins all relevant systems and processes with a continuing commitment and ongoing vigilance. Within this culture it includes listening to children and taking account of their wishes.

2. Scope

2.1. Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff (including supply staff), trustees, ambassadors, guest speakers and volunteers in the academy and is consistent with the procedures of the Local Safeguarding Partners. Our policy and procedures also apply to extended academy and off-site activities.

2.2. In line with *Keeping Children Safe in Education* (KCSIE 2021), children includes everyone under the age of 18. Whilst we fully adhere to this statutory requirement, our duty of care remains in place in full until a child completes their educational provision with us. This extends from the beginning of the Early Years Foundation Stage to the end of Key Stage 5 and therefore beyond the age of 18. In such cases, our practice does not change in relation to safeguarding all of our students. Therefore, where the policy refers to under the age of 18 as set out in legislation, the policy should also be read within this scope to meet in full our duty of care.

3. Legislation and Regulation

3.1. This policy is based on the Department for Education's (DfE) statutory guidance, *Keeping Children Safe in Education 2021*¹ and [Working Together to Safeguard Children](#)², and the Department for Education (DfE) [Governance Handbook](#)³. We comply with this guidance and the procedures set out by our local safeguarding

² <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/788234/governance_handbook_2019.pdf

partners (see local circumstances Appendix 6 for further information).

- 3.2. This policy complies with our Funding Agreement and Articles of Association.
- 3.3. This policy meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- 3.4. **This policy is also based on the following legislation:**
 - Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of children.
 - [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques.
 - 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.
 - [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
 - 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 where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
 - [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
 - [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
 - Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
 - 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.

4. Policy Statement

- 4.1. All children should be protected from risk of abuse/harm but it is important to recognise that some children potentially have an increased risk, and additional barriers can exist for some children with respect to recognising or disclosing it.
- 4.2. 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.
- 4.3. We give special consideration to students who:

- Have special educational needs and/or disabilities;
- Are in need of a social worker;
- Are young carers;
- May experience discrimination due to their race, ethnicity, faith and belief or no faith, age, gender identification; sexuality;
- Are pregnant or in receipt of paternity/maternity leave;
- Are married or in a civil partnership;
- Have English as an additional language;
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse, domestic abuse or poor mental health;
- Are at risk of FGM, sexual/criminal exploitation, forced marriage, or radicalisation;
- Are asylum seekers;
- Are looked after or who have been previously looked after;
- Are privately fostered;
- Are children missing education;
- May be due to receive elective home education as formally requested by a parent/carer;
- Are children accessing alternative provision (AP).

5. Recognising abuse and taking action

- 5.1. Staff, trustees, Ambassadors and volunteers **must** follow the procedures set out below in the event of a safeguarding issue.

If a child is in immediate danger:

- 5.2. Make a referral to children’s social care and/or the Police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**
- Tell the Designated Safeguarding Lead (DSL) as soon as possible if you make a referral directly.
 - We work in partnership with other agencies in the best interests of the children. The academy will, where necessary, liaise with Police, any relevant external agency including GP, school nurse, and make a referral to children’s social care. Where the child already has a safeguarding social worker, the request for service should go immediately to the social worker involved, or in their absence to their team manager.
 - The following link provides additional guidance for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>
 - **Details of how to make a referral is also included in the academy local circumstances (Appendix 6) at the end of this policy.**

If a child makes a disclosure to you:

5.3. If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them;
- Allow them time to talk freely, ask open questions only and do not ask leading questions;
- Stay calm and do not show that you are shocked or upset; tell the child they have done the right thing in telling you;
- Do not tell them they should have told you sooner;
- Explain what will happen next and that you will have to pass this information on;
- Do not promise to keep it a secret;
- Speak directly to the DSL/Deputy DSL immediately. Please contact a member of the leadership team if you are unable to find a member of the safeguarding team;
- Record on CPOMs the conversation as soon as possible in the child's own words. Stick to the facts and do not put your own judgement on it. The record must include dates and times to ensure there is an accurate record; alternatively, if appropriate and there is immediate risk of harm, make a referral to children's social care and/or the Police directly, and tell the DSL as soon as possible that you have done so.

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

5.4. So-called honour based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing. These are detailed below.

5.5. The Department for Education's (DfE 2021) *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".

- **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'.
- **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 section 5.7 below.
- **Any teacher** who discovers that an act of FGM appears to have been carried out on a **pupil under 18**, must immediately report this to the Police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- **The duty 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 must inform the DSL if they have any concerns that a pupil may be having FGM

surgery in the future in the UK but also abroad. Staff must not examine pupils.

- **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 and follow the Academy local safeguarding procedures (see Appendix 6).
- Section 6(1) of the FGM ACT 2003 states that ‘girl includes woman’. In line with the Scope item 2.2 in this policy, **our duty does extend to all girls within our duty of care and reporting must also be in line with local safeguarding arrangements for child protection.**

5.6. The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Indicators that FGM has already occurred include:

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

5.7. Potential signs that a pupil may be at risk of FGM include:

- The girl’s family having a history of practising FGM (this is the biggest risk factor to consider);
- FGM being known to be practised in the girl’s community or country of origin;
- A parent or family member expressing concern that FGM may be carried out;
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues;
- Unexpected holiday abroad and rumours of surgery or rituals or traditions abroad; having a mother, older sibling or cousin who has undergone FGM;
- Having limited level of integration within UK society; confiding to a

professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”;

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period;
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
- Being unexpectedly absent from school or visiting a surgeon from another country who is visiting the UK; having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

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

If you have concerns about extremism and radicalisation

- 5.9. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat 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’
- 5.10. Schools have a duty to prevent children from being drawn into terrorism. 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.
- 5.11. The DSL will assess the risk of children in our 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.
- 5.12. If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to the local authority children’s social care directly if appropriate (see ‘Referral’ above).
- 5.13. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral. This could include [Channel](#), the government’s programme for identifying and supporting individuals at risk of being drawn into 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.

- 5.14. The Department for Education (DfE) also has a dedicated telephone helpline, 020 7340 7264, that academy staff and regional teams can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- 5.15. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
- Think someone is in immediate danger;
 - Think someone may be planning to travel to join an extremist group;
 - See or hear something that may be terrorist-related.
- 5.16. We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at the academy and at home.
- 5.17. 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.
- 5.18. The government website Educate Against Hate <https://educateagainsthate.com/> and charity NSPCC say that signs that a pupil is being radicalised can include:
- Refusal to engage with, or becoming abusive to, peers who are different from themselves;
 - Becoming susceptible to conspiracy theories and feelings of persecution
 - Changes in friendship groups and appearance;
 - Rejecting activities they used to enjoy;
 - Converting to a new religion;
 - Isolating themselves from family and friends;
 - Talking as if from a scripted speech;
 - An unwillingness or inability to discuss their views;
 - A sudden disrespectful attitude towards others;
 - Increased levels of anger;
 - Increased secretiveness, especially around internet use;
 - Expressions of sympathy for extremist ideologies and groups, or justification of their actions;
 - Accessing extremist material online, including via social media platforms;
 - Possessing extremist literature;
 - Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.
- 5.19. 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.
- 5.20. Staff must always take action if they are worried.

Forced marriage

- 5.21. Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological and can come from parents and other family members or elders in a particular religion.
- 5.22. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.
- 5.23. The DSL will:
- Speak to the pupil about the concerns in a secure and private place;
 - Activate the local safeguarding procedures and refer the case to the local authority's designated officer;
 - Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk; refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Breast ironing

- 5.24. Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa. Further information in relation to breast ironing can be found at www.nationalfgmcentre.org.uk.
- 5.25. The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.
- 5.26. Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence.
- 5.27. Staff worried about the risk of breast ironing in their academy should speak to the Designated Safeguarding Lead as soon as possible.

Serious violence

5.28. As included in KCSIE 2021, all staff should be aware of indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or significant change in well-being;
- signs of assault or unexplained injuries;
- unexplained gifts or new possessions.
- exclusions or being permanently excluded
- having experienced maltreatment
- been involved in offending (i.e. robbery or theft)
- Being male

5.29. These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

5.30. All staff should be aware of the associated risks and understand the measures in place to manage these. Further advice can be provided in the Home Office's 2018 guidance documents: ⁴*Preventing Youth Violence and Gang Involvement* and ⁴*Criminal exploitation of children and vulnerable adults: county lines* guidance.

Child Exploitation

5.31. A form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual (CSE) or criminal (CCE) activity.

5.32. Child sexual exploitation (CSE) is where children are sexually exploited for money, power or status. This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE is a form of child sexual abuse.

5.33. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

- 5.34. Child criminal exploitation (CCE) is where children are used to complete criminal activity (a) in exchange for something they need (i.e. food/money), (b) for the financial or other advantage of the perpetrator, or (c) through violence or the threat of violence. This can also occur through the use of technology.
- 5.35. CCE can include county lines (see below) or children being forced to work in cannabis factories, forced to shoplift or pickpocket or to threaten other young people.
- 5.36. County lines is a form of CCE that refers to gangs or organised criminal networks exploiting children to transport illegal drugs/drug money into one or more importing areas (within the UK) using 'deal lines' (dedicated mobile phone lines). Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 5.37. It is acknowledged that experiences of girls and boys in relation to CCE can be different but both can exist and where this is the case, there is a higher risk of CSE.
- 5.38. If a member of staff suspects CSE or CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the Police, if appropriate.
- 5.39. Indicators of child exploitation can include a child:
- Appearing with unexplained gifts or new possessions;
 - Associating with other young people involved in exploitation;
 - Having older boyfriends or girlfriends;
 - Suffering from sexually transmitted infections or becoming pregnant;
 - Displaying inappropriate sexualised behaviour;
 - Suffering from changes in emotional wellbeing;
 - Misusing drugs and/or alcohol;
 - Going missing for periods of time, or regularly coming home late;
 - Regularly missing school or education, or not taking part in education.

Domestic Abuse

- 5.40. Staff will be made aware of The Domestic Abuse Act 2021 that received royal assent on 29 April 2021. Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are personally connected. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

5.41. All children can see, hear or experience domestic abuse in the context of their home life. They are therefore victims in their own right. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Online Safety

- 5.42. Staff are made aware that technology is a significant component of safeguarding issues and abuse can take place concurrently online and in daily life. Online safety is an ongoing and interrelated theme that informs other policy and systems/processes.
- 5.43. The prevalence of issues arising through children's access to the online world is significant and all staff should be aware of associated risks and signs/symptoms. These are categorised within KCSIE 2021 as:
- Content
 - Contact
 - Conduct
 - Commerce
- 5.44. This includes non-age-appropriate content, self-harm and suicide, sharing nudes or semi-nudes, cyberbullying, grooming, radicalisation, gaming (now identified by the World Health Organisation as a disorder), online gambling, inappropriate advertising and cybercrime. Our pupils will receive sessions to ensure they are aware of the risks associated above and how to report any concerns.
- 5.45. We will continue to follow advice from the DfE in relation to online safety where children are being asked to learn online from home.
- 5.46. Staff will receive annual training around online safety including the signs/symptoms for the 4 C's above as well as the signposting available to students in order to build their online resilience. We will also work with parents/carers to support them in how to keep their children safe online.
- 5.47. Academies will complete an annual review/risk assessment of their online safety provision to ensure continued good practice.
- 5.48. Specific reference to safeguarding in relation to access online can be found in the Trust's Online Safety Policy.

Filtering and Monitoring

- 5.49. The Department for Education (DfE 2021) *Keeping Children Safe in Education* requires schools and colleges in England to '*ensure appropriate filters and*

appropriate monitoring systems are in place'. There is additional guidance how to teach pupils to be safe online on the DfE guidance.

5.50. Children should not be able to access harmful or inappropriate material from the academy's IT system" however, academies will need to "be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

5.51. We recognise that no filter can be guaranteed to be 100% effective. The Headteacher along with the Regional Operations Director (ROD), will check that the academy is satisfied that their filtering system manages the following content (and web search). The filtering will have regard to:

- Discrimination – a web search that promotes the unjust or prejudicial treatment of people on the grounds of race, religion, age, sexuality, gender identity, disability; drugs/substance abuse - displays or promotes the illegal use of drugs or substances;
- Extremism - promotes terrorism and terrorist ideologies, violence or intolerance; malware/hacking - promotes the compromising of systems including anonymous browsing and other filter bypass tools as well as sites hosting malicious content;
- Pornography - displays sexual acts or explicit images; piracy and copyright theft - includes illegal provision of copyrighted material;
- Self-harm - promotes or displays deliberate self-harm (including suicide and eating disorders); violence - displays or promotes the use of physical force intended to hurt or kill.

5.52. The academy makes sure that their filtering system meets the following principles:

- Age appropriate, differentiated filtering – includes the ability to vary filtering strength appropriate to age and role; has the ability and ease of use that allows academies to control the filter themselves to permit or deny access to specific content;
- The filtering provider publishes a rationale that details their approach to filtering with classification and categorisation as well as over blocking;
- The filtering system has the ability to identify users;
- Mobile and App content – mobile and app content is often delivered in entirely different mechanisms from that delivered through a traditional web browser. To what extent does the filter system block inappropriate content via mobile and app technologies (beyond typical

web browser delivered content);

- Multiple language support – the ability for the system to manage relevant languages. Network level filtering should be applied at ‘network level’ i.e., not reliant on any software on user devices;
- Reporting mechanism – the ability to report inappropriate content for access or blocking. Reports – the system offers clear historical information on the websites visited by your users.

5.53. We recognise that no monitoring can guarantee 100% effectiveness. The academy will make sure that there are appropriate monitoring systems in place to check for:

- Content that is illegal, for example child abuse images and terrorist content;
- The repeated use of force, threat or coercion to abuse, intimidate or aggressively dominate others;
- Encouraging the child into a coercive/manipulative sexual relationship. This may include encouragement to meet;
- Promotes the unjust or prejudicial treatment of people on the grounds of race, religion, age, sex, sexuality, disability or gender identity;
- Displays or promotes the illegal use of drugs or substances;
- Promotes terrorism and terrorist ideologies, violence or intolerance;
- Displays sexual acts or explicit images;
- Promotes or displays deliberate self-harm; promotes the use of physical force intended to hurt or kill; suggest the user is considering suicide.

5.54. The academy makes sure that the content is age appropriate – includes the ability to implement variable monitoring appropriate to age. The system includes the capability to monitor personal mobiles and app technologies (i.e. not owned by the school), ensure it is deployed and supported and how data is managed.

5.55. The Regional Operations Director and the IT systems manager uses monitoring results to inform policy and practice. All users are made aware that their online access is being monitored via staff training, staff handbooks, assemblies to pupils and computing lessons.

Mental Health

- 5.56. Supporting all children's mental health is a key priority for the trust (and is specifically included within the KCSIE definition of 'safeguarding') and this includes preventing/acting on abuse caused by impairment of a child's mental health or development. All 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).
- 5.57. Poor mental health is an indicator of potential harm and potential adverse childhood experiences. Training for staff will include being aware of this link.
- 5.58. 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 liaising with the senior mental health lead.
- 5.59. Specific reference to safeguarding in relation to mental health can be found in the Trust's Pupil Mental Health and Wellbeing Policy.

Extra-Familial Harms

- 5.60. Safeguarding concerns can be associated with factors outside the home environment and all staff (but especially safeguarding teams) should be aware of the context that such concerns can occur. This includes issues that arise in an academy, between peers, within the local community or online. Children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.
- 5.61. The academy will consider all potential harms when assessing the risk to a pupil.

Private Fostering

- 5.62. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.
- 5.63. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.
- 5.64. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.
- 5.65. 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.

- 5.66. The academy has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. The academy will make it clear who has parental responsibility.
- 5.67. Academy staff will 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.
- 5.68. On admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered.

Elective Home Education (EHE)

- 5.69. In these circumstances the request will be recorded on CPOMS, a parental meeting completed to discuss the barriers to remaining on roll, the LA being informed in line with local procedures and a review of the request by the Regional Safeguarding Lead who provides authorisation if appropriate. Parents/carers will be informed in writing. Consultation with relevant external agencies will be completed as appropriate.

Pupil Awareness

- 5.70. All pupils will receive an age-appropriate personal development curriculum that ensures they are provided with effective information, support and signposting for all safeguarding areas. This includes delivery through the statutory RSHE guidance. Pupils will be taught about relevant risks, appropriate behaviour and how to report concerns.

Child Abduction/Community Safety/Modern Slavery

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

subjected to violence or threat, unexplained injuries, concerns over identity or other relevant documentation, being in a situation of dependence or perception of being bonded by debt, receiving little or no payment. We will complete a referral to the National Referral Mechanism (NRM) where we have concerns about a child in relation to modern slavery.

- 5.74. Staff will receive awareness training about these concerns and the work with pupils will be focused on practical advice to staying safe together with building confidence and resilience.

6. Safeguarding concerns or allegations of abuse

Concerns about a staff member, volunteer or supply staff

- 6.1. If there is a safeguarding concern or allegation that may meet the harm test then this should be addressed in line with Part 4 of KCSIE 2021. Information in relation to the harm test is provided in Part 4 through a link to '[Making barring referrals to the DBS](#)'.
- 6.2. Members of staff must comply with the requirements of the Department for Education (DfE) Teachers' Standards:
<https://www.gov.uk/government/publications/teachers-standards>
- 6.3. Members of staff must comply with the Trust's staff Code of Conduct. Members of staff should recognise the '[Guidance for Safer Working practice for Adults who work with Children and Young People in Education \(2019\)](#)'.
- 6.4. In line with the Trust's Whistleblowing Policy, if you have concerns about a member of staff, volunteer or supply staff, speak to the Headteacher. If you have concerns about the Headteacher, speak to the Regional Education Director. You can also discuss any safeguarding procedural concerns with the DSL.
- 6.5. The Headteacher/DSL will then follow the procedures set out in Appendix 3, if appropriate including informing the designated officer for the local authority (LADO) if required.
- 6.6. In relation to allegations against supply staff, KCSIE 2021 states 'the school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process'. Therefore, the academy will act as lead professional for these allegations and communicate regularly with the LADO and supply agency. Supply agencies will be informed of the academy process for managing allegations.

6.7. In the primary, and where appropriate, the secondary academies, the academy will inform Ofsted of the allegation and actions taken, particularly if the child is below compulsory school age or within the EYFS, within the necessary timescale (see Appendix 3 for more detail).

Allegations of abuse made against other pupils (peer-on-peer or child on child abuse)

6.8. Examples of peer on peer/child on child abuse (but not limited to):

- Bullying (including cyberbullying)
- Abuse in intimate personal relationships between peers
- Physical abuse
- Sexual violence
- Sexual harassment
- 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)
- Consensual and non-consensual sharing of nudes and semi nudes
- Upskirting
- Initiation/hazing

6.9. We recognise that children are capable of abusing their peers/other children and that this can happen inside or outside of school and online. Abuse will never be tolerated or passed off as “banter” or “part of growing up”. We have a zero-tolerance approach.

6.10. 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:

- Is serious, and potentially a criminal offence;
- Could put pupils in the school at risk;
- Is violent;
- Involves pupils being forced/coerced into drugs or alcohol;
- Involves criminal exploitation, such as threatening other children into criminal activity
- Involves sexual exploitation, abuse, violence or harassment

6.11. 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 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 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.

- 6.12. Upskirting, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This is a criminal offence under the Voyeurism (Offences) Act 2019 and victims can be of any gender or identification.
- 6.13. When 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.
- 6.14. Whilst not intended to be an exhaustive list, sexual harassment can include:
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names:
 - Sexual "jokes" or taunting;
 - Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature;
 - online sexual harassment:
 - o 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'
 - o sharing of unwanted explicit content (e.g. pornography)
 - o Misogynistic messages
 - o upskirting
 - o Sexualised online bullying;
 - o Unwanted sexual comments and messages, including, on social media;sexual exploitation; coercion and threat.
- 6.15. Our 'Filtering and Monitoring' processes ensure that any pupil who completes peer on peer abuse online (through academy systems) can be identified and action taken.

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

- 6.16. You must tell 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; the

wellbeing of all children involved is essential and the DSL will contact specialist mental health services, if appropriate. Parents/carers will be informed in a timely manner and wherever possible, children provided with an outcome for the allegation. The four likely scenarios for managing reports are: manage internally (i.e. through behaviour policy), Early Help referral, Social Care referral, reporting to the Police. Deliberately false/malicious allegations will be considered in line with the behaviour policy.

- 6.17. In relation to sexual violence and harassment: Ultimately, any decisions are for the school to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role, using their professional judgement, and being supported by other agencies, such as children's social care and the police as required.
- 6.18. We will minimise the risk of peer-on-peer/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 with respect to 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 peer on peer abuse and know how to report their concerns; ensuring staff understand 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.

If you have concerns about a child (as opposed to a child being in immediate danger)

- 6.19. **Figure 1** illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.
- 6.20. Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).
- 6.21. You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Early help

- 6.22. If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- 6.23. 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.

Referral

- 6.24. 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.
- 6.25. If you make a referral directly, you must tell the DSL as soon as possible.
- 6.26. The local authority will make a decision 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.
- 6.27. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.
- 6.28. If at any point the academy feels that the rationale/justification for the decisions made by social care do not ensure that the child is prevented from risk of harm then they will escalate their concerns in line with the social care escalation policy/procedure. This must be recorded on CPOMS.

Allegations and/or low level concerns against staff

- 6.29. Allegations and/or low level concerns against staff will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 3). For use of reasonable force, please refer to section 16 of Behaviour and Anti-Bullying Policy.

Other complaints

- 6.30. If concerns are raised by parents/carers that relate to a possible safeguarding issue, the matter will be referred to the Designated Safeguarding Lead on the senior leadership team and will be handled in line with this Child Protection and Safeguarding Policy. If the concerns related to the premises, the Headteacher would work collaboratively with the operations team/Regional Operations Director to investigate the concerns further and take action if required.
- 6.31. In the EYFS, there is a written procedure for dealing with concerns and complaints from parents and/or carers, and will keep a written record of any complaints, and their outcome.
- 6.32. Primary schools will investigate written complaints relating to their fulfilment of the EYFS requirements and notify complainants of the outcome of the investigation within 28 days of having received the complaint.
- 6.33. Early years providers will make available to parents and/or carers details about

how to contact Ofsted if they believe the provider is not meeting the EYFS requirements. Parents and /or carers will be made aware if they are to be inspected by Ofsted. A copy of the report will be issued to parents and/or carers of children attending on a regular basis.

Whistle-blowing

- 6.34. The academy has a separate whistle-blowing policy that covers concerns regarding the way the academy safeguards pupils – including poor or unsafe practice, or potential failures.

7. Training

All staff

- 7.1. All staff members will undertake safeguarding and child protection training at induction, including the academy child protection and safeguarding policy, the academy behaviour policy, the staff code of conduct, CME, whistle-blowing procedures, and the role of the DSL, to ensure they understand the academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be annually updated and will be in line with advice from our Local Safeguarding Partners.
- 7.2. All staff are responsible for ensuring that their individual understanding of safeguarding is up to date at all times. Staff must be aware who they should approach with concerns or questions.
- 7.3. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- 7.4. Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- 7.5. All staff training will follow the trust Staff Safeguarding CPD Plan as a minimum expectation. Additional bespoke training will be coordinated by an academy as required (i.e. in line with local circumstances).
- 7.6. 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 the additional safeguarding risks.

The Designated Safeguarding Lead and Deputy/Deputies

- 7.7. The DSL and Deputy/Deputies will undertake child protection and safeguarding training at least every two years.

7.8. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding policy documents and national updates).

7.9. They will also undertake Prevent awareness training.

All Pupils

7.10. The academy will ensure all pupils develop their knowledge and understanding of all safeguarding areas in an age appropriate manner. This will be mapped out by the academy at the start of each academic year and may take the form of assemblies, PSHE sessions, off-curriculum days, notice boards, displays, posters or bespoke sessions from external providers. Where necessary, the academy will be responsive to local context and circumstances. Pupils will learn how to identify and manage risks as well as how mitigate against those risks and how to raise a concern at any time.

8. Children missing from education

8.1. The numbers of CME will be reported on by the academy regularly and will be reviewed by the Regional Safeguarding Lead and Regional Education Directors. Any concerns will be immediately addressed (i.e. asking about the steps being taken to trace and track the movement of CME pupils and actions being taken to ensure their safety). An off-roll form **must** be completed by the academy and provided to the Regional Safeguarding Lead to identify the reasons why a child will be taken off the academy roll. The Regional Education Director must also review the form with the Regional Safeguarding Lead before a child is taken off-roll. To support in ensuring all our pupils are safe, a weekly welfare check will be completed by the academy for any pupil who is absent for 5 consecutive days regardless of the reason for absence.

8.2. A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect;
- Come from Gypsy, Roma, or Traveller families;
- Come from the families of service personnel;
- Go missing or run away from home or care;
- Are supervised by the youth justice system; come from new migrant families.

8.3. 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 and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local

authority if a child leaves the 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.

- 8.4. 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.
- 8.5. 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.
- 8.6. Parents/carers will be supported to ensure that they provide at least two emergency contacts for their child and that the academy is updated if these numbers change.

9. Recruitment - interview/appointment panels

- 9.1. At least one person on any interview/appointment panel for a post at the academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's (DfE) statutory guidance, *Keeping Children Safe in Education* September 2021 and be in line with local safeguarding procedures.

10. Staff who have contact with pupils and families

- 10.1. All 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. This may be through their line management structure with specific safeguarding supervision being available to DSLs via their Regional Safeguarding Lead.

11. Responsibilities

All staff

- 11.1. All staff will read and sign to confirm their understanding of Part 1 and Annex B of the Department for Education's (DfE 2021) statutory safeguarding guidance, [Keeping Children Safe in Education](#), and **review this guidance at least annually**. Annex A now provides a condensed version of Part 1 and will be utilised for staff who do not work directly with children on a regular basis.
- 11.2. All staff will understand:

- Our systems which support safeguarding, including the staff code of conduct policy, the role of the Designated Safeguarding Lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education;
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment; the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including statutory duties such as reporting FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation.
- How to raise a safeguarding concern or allegation in relation to a member of staff, volunteer or supply staff.

The Designated Safeguarding Lead (DSL)

- 11.3. The DSL takes lead responsibility for child protection and wider safeguarding.
- 11.4. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- 11.5. The contact details of the DSL and Deputy DSL and Regional Safeguarding Lead can be found at the front of this policy.
- 11.6. When the DSL is absent, the deputy/deputies will act as cover.
- 11.7. If the DSL and deputy/deputies are not available, the Headteacher must arrange for appropriate cover (for example, during out-of-hours/out-of-term activities). This may include the DSL or deputy/deputies being contactable by phone and the lead member of staff having access to this. Staff should speak to the lead member of staff and/or take advice from Social Care if unable to speak to the DSL/DDSL.
- 11.8. The DSL 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:
- Take part in strategy discussions and inter-agency meetings and/or

support other staff to do so;

- Contribute to the assessment of children; 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;
- Keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Link with the three local safeguarding partners and other external agencies as required. In relation to the Police, this will include consideration for 'When to call the Police'.
- Take lead responsibility for promoting educational outcomes for social-worker children (SWC) by knowing their safeguarding concerns and the impact these might have on attendance, engagement and achievement.
- Understanding the views of children – Encourage a culture of listening/taking account their wishes and understanding the difficulties they may have in approaching staff about their issues
- Share a child's safeguarding information with the new provision within 5 days of them leaving and share in advance any additional information that is required to safeguard a child.

11.9. The role of DSL and Deputy DSL is explicit in the role holder's job description. The full description of their responsibilities is set out in Appendix 5.

Governance

11.10. The Board of Trustees and the Executive Leadership team (ELT) will approve this policy at each review. In upholding their governance function the Regional Education Director and Regional Safeguarding Lead will hold the Headteacher to account for its implementation.

11.11. The Regional Safeguarding Lead will ensure the academy contributes to multi-agency working in line with the DfE statutory guidance *Working Together to Safeguard Children 2018*. The academy must understand their role in the new safeguarding partner arrangements in the local authority.

11.12. The Regional Safeguarding Lead will monitor the effectiveness of this policy. They are responsible for liaising with the Headteacher and Designated Safeguarding Lead over all matters regarding child protection issues.

- 11.13. The Regional Safeguarding Lead will liaise with the Headteacher and the Designated Safeguarding Lead to produce an annual report for the local authority (s175/s157).
- 11.14. The Regional Education Director or the National Safeguarding Director will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see Appendix 3).
- 11.15. All staff are trained in the procedures to follow if they have a safeguarding concern/allegation in relation to a regional/national member of staff (in line with the Trust's Whistleblowing Policy).

The Headteacher

- 11.16. The Headteacher, or where appropriate her/his deputy, is responsible for the implementation of this policy, including:
- Ensuring that staff (including temporary/supply staff) and volunteers are informed of this policy as part of their induction; communicating this policy to parents when their child joins the academy and via the academy website;
 - Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
 - Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly;
 - Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff, volunteer or supply staff, where appropriate (see Appendix 3);
 - Ensuring the relevant staffing ratios are met, where applicable;
 - Ensuring that each child in the Early Years Foundation Stage is assigned a key person.

Confidentiality

- 11.17. The academy has a separate policy with respect to confidentiality and data protection. This includes a list of guidelines for staff to follow to avoid breaching confidentiality. All staff must be aware that:
- Timely information sharing is essential to effective safeguarding (including withholding personal information for the purposes of keeping a child safe); Whether problems are first emerging or a child is already known to Social Care.

- Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm;
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests;
- Confidentiality is also addressed in this policy with respect to allegations of abuse against staff in Appendix 3.

11.18. We will hold records in line with our E-ACT Information and Records Retention Policy and data protection legislation.

11.19. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS. Staff can choose to upload a hand-written record on CPOMS if required. If you are in 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 clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- Notes of any action taken and decisions reached (including a rationale/justification for these decisions as appropriate).

11.20. In the circumstance that CPOMS is not working effectively, the back-up process will be initiated:

- Inform CPOMS (CPOMS: 08453451155 or helpdesk@cpoms.co.uk)/IT/Regional Safeguarding Lead so that they can address the issue
- Regional Safeguarding Lead to inform National Safeguarding Director/DCEO/National IT Security Manager
- Inform safeguarding team and academy staff that back-up system is initiated
- Implement either (a) paper concern template (b) secure OneDrive template
- NOTE: Urgent concerns must be reported to the safeguarding team in person
- The safeguarding team will increase ad hoc meetings to discuss new concerns in the context of historical information given that CPOMS will not be a source for this
- When CPOMS is fixed all information for the following categories must be transferred (either scanned or inputted as a new incident and back-dated) as a priority (1 week) with all other categories transferred within 1 half-term:
 - All 'Red' categories
 - Safeguarding
 - POP/COC
 - Positive Handling

11.21. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the academy. The safeguarding

records are all stored on CPOMS. There are historic paper records still held within the academy that are used when required. The Trust has a separate policy that provides additional information for how long the records are held. This is in our E-ACT Information and Records Retention Policy.

- 11.22. The academy will share information with other agencies and when this is appropriate, in line with your local safeguarding procedures.

12. Notifying parents/carers

- 12.1. 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.
- 12.2. Other staff will only talk to parents/carers about any such concerns following consultation with the DSL.
- 12.3. 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.
- 12.4. 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 upon any potential investigation or place any children at risk of harm.

13. Mobile phones and cameras

- 13.1. In the EYFS and in primary academies, no member of staff may use their own tablet, phone or other device to take photographs whilst children are present. Academy tablets, phones, devices may only be used in the main classroom area (not toilets or changing rooms or where children are changing their clothes) during work time when they may want a record of a child's learning for assessment purposes.
- 13.2. Staff are allowed to bring their personal phones to the academy for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.
- 13.3. Staff will not take pictures or recordings of pupils on their personal phones or cameras. This includes at performance events. Headteachers and other key roles will be provided with an E-ACT mobile device.
- 13.4. We will follow the General Data Protection Regulation⁵ which formed the Data Protection Act 2018 when taking and storing photos and recordings for use in the

⁵ <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

academy.

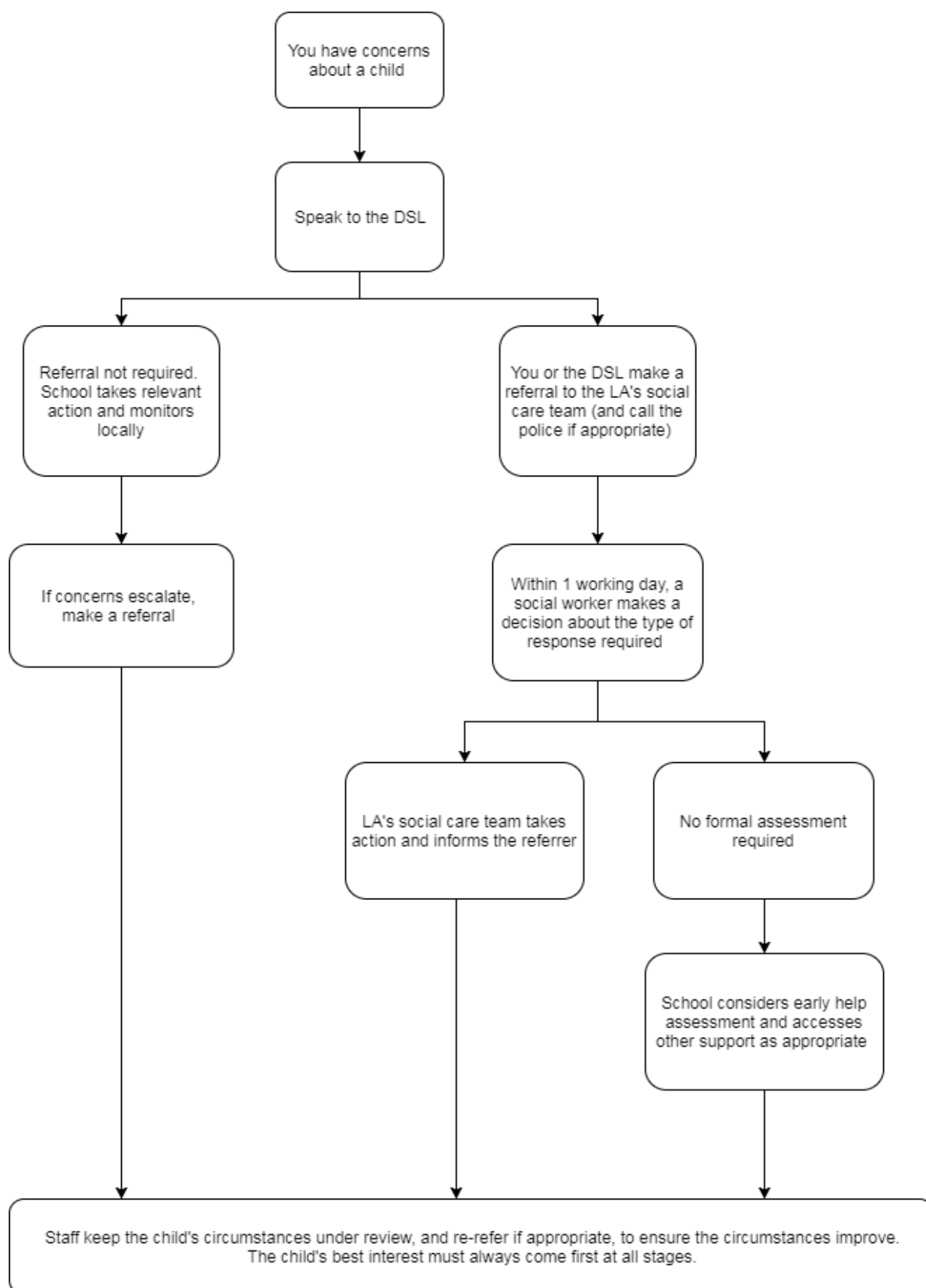
14. Monitoring and Compliance

- 14.1. This policy will be monitored by the National Safeguarding Director and Regional Safeguarding Leads and through regular meetings with the CEO. Compliance will be assured through the abovementioned staff. Full access is in place for each Academy CPOMS and Academy Safeguarding SharePoint. Together with this, the E-ACT monthly data and E-ACT Power BI Assembly Pro provides timely data to further assess compliance. This will supplement on-site and remote visits including through GRDs and WADs.

15. Policy Review

This policy will be reviewed annually. At every review, it will be approved by the Executive Leadership Team (ELT) and the full governing board of the Trust, the Board of Trustees.

Figure 1: Procedure if you have concerns about a child's welfare (no immediate danger)



Appendix 1: 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.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Safer Recruitment and DBS checks

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

Appointing new staff

When appointing new staff, we will:

- Verify their identity (best practice is checking their birth certificate)
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available (alongside a risk assessment and only under exceptional circumstances following authorisation) or where previous role was in regulated activity and was less than three months before appointment
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK so that any relevant events that occurred outside the UK can be considered. This could include criminal records checks for overseas applicants and a letter from the relevant professional regulating authority (seen as the certificate of professional competence) – A risk assessment will be implemented if these checks are not obtainable to demonstrate alternative methods sought and other relevant evidence.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State – NOTE: Job title is not the determining factor for a 'management' position
- Ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training,

instructing, caring for or supervising children

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

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

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

DBS checks will be undertaken every three years.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform (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.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity;
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the academy.

This section applies to our use of alternative provision (AP).

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out, as detailed in appointing new staff.

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity.

Governance

Role	DBS	Barred List	S128
Trustee	Enhanced	No	Yes
ELT	Enhanced	Yes	Yes
National	Enhanced	Yes	Yes
Regional	Enhanced	Yes	Yes
Ambassador (Amber lanyard)	Enhanced	Yes*	No

*Opt out available but would result in full supervision (red lanyard)

- All persons within our Trust governance structure will have the above checks completed prior to commencement of their role. Some checks are determined by whether their role includes working in regulated activity with children at an academy.
- All other checks in line with the Trust SCR and Safer Recruitment Policy also apply. The Chair of the Board of Trustees will have their DBS countersigned by the Secretary of State.

Adults who supervise pupils on work experience

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

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil (under 16) on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity. It will also depend on whether the individual(s) are supervised themselves and providing support frequently (more than 30 days in 30 or overnight). The decision and any risk assessment required will be recorded on CPOMS.

If a pupil (over 16) is on work experience that gives the opportunity for contact with children then consideration should be given on whether an enhanced DBS check is required for the pupil themselves.

Pupils staying with host families

Where the academy makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those individuals.

Where the academy is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

This will be supported by any relevant intelligence/information to assess the suitability. The decision and any risk assessment required will be recorded on CPOMS.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff at reception.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in and wear a visitor's badge. The academy will issue a red lanyard to the visitor if the academy has not completed all the relevant checks. **If a visitor is wearing a red lanyard they cannot be left unsupervised in the academy at any point.**

Visitors in a professional capacity will have identity checked and we will obtain assurance that an appropriate DBS check is in place alongside a letter of reassurance.

All visitors to our setting, including external organisations, will be accompanied by a member of staff in regulated activity at all times. We will carefully consider the suitability of input from external organisations including an assessment of the educational value, age appropriateness and relevant checks.

We will not invite into the academy any individual/organisation who is known to disseminate extremist views and we will carry out appropriate checks to ensure that any individual/organisation using academy facilities is not seeking to disseminate extremist views or radicalise pupils, parents or staff.

Appendix 3: Allegations/Low level concerns against staff

1: Allegations that may meet the harms threshold (Allegations)

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

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

The final bullet point refers to 'transferable risk' from a MOS who is involved in an incident outside of school that does not involve children i.e. a MOS who is involved in perpetrating domestic abuse at home and it is determined that a child could trigger the same reaction and would thus be put at risk.

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the Police/LADO and the academy will support any investigations in full.

We will deal with any allegation of abuse against a member of staff, volunteer or supply staff very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. In the event that this applies to supply staff then regular communication will take place between the academy and supply agency/LADO until the conclusion of the allegation.

Our procedures for dealing with allegations will be applied with common sense and fair judgement.

Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been

consulted

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the trust.

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Headteacher (or the Regional Education Director/National Safeguarding Director) where the Headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately ensure any children and staff involved in the allegation are safe
- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the Police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the Police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the Police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the Police or children’s social care services, where necessary). Where the Police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, Police and/or children’s social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the

allegation or concern within 1 working day, and the individual will be given a named contact at the academy and their contact details.

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation. This may sometimes result in further action being taken if there are concerns regarding the conduct of the member of staff.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in the academy and/or liaise with the Police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. The trust provides external and confidential support for all employees 'Employer Assistance Programme'. The contact number is 0800 0305182.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the Police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
- In the case of a member of teaching staff, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.
- NOTE: If the academy is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by Teaching Regulation Authority (TRA).

Ensuring actions do not jeopardise any potential Police investigation...

Allegations against Staff: Process by Case Manager (Headteacher)

If basic enquiries determine potential foundation to allegation:

Inform LADO – Inform RED/RSL/HR – Complete LADO referral if requested by LADO – Investigation (either by Police/Social Care/internally through investigating officer (IO) –

Outcome recorded on SAM and shared with above professionals

If basic enquiries determine no potential foundation to allegation:

Check to ensure allegation is not malicious – Confirm conclusion to individual who raised the allegation – Outcome recorded on SAM and shared with RED/RSL/HR

Allegations against Headteacher: Process by Case Manager (RED)

If basic enquiries determine potential foundation to allegation:

Inform NSD/CEO – Inform LADO – Complete LADO referral if requested by LADO – Investigation (either by Police/Social Care/internally through investigating officer (IO) – Outcome recorded on SAM and shared with above professionals

If basic enquiries determine no potential foundation to allegation:

Inform NSD/CEO – Check to ensure allegation is not malicious – Confirm conclusion to individual who raised the allegation – Outcome recorded on SAM and shared with NSD/CEO

In the Primary Academies we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

Where the Police are involved, wherever possible we will ask the Police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the academy disciplinary process, should this be required at a later point.

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the Police and/or children's Social Care.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

The case manager will take advice from the local authority's designated officer, Police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared;
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;
- What, if any, information can be reasonably given to the wider community to reduce speculation;
- How to manage press interest if, and when, it arises.

Record Keeping

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

Such records will include:

- A clear and comprehensive summary of the allegation or safeguarding concern
- Details of how it was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

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

Learning lessons

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

This will include consideration of (as applicable):

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

NOTE: Abuse can be reported no matter how long ago it happened.

2: Allegations that do not meet the harms threshold (Low level concerns)

We have an open and transparent culture where **all** concerns about adults are dealt with promptly and appropriately, and where all adults feel able to share their concerns. Where the harms threshold is not met, there are still concerns that can exist from: suspicion, patterns in behaviour, a 'nagging doubt' or incidents that are inconsistent with the staff code of conduct.

Examples of this could include:

- Being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging 1:1 with a child in a secluded area or behind a closed door

- using inappropriate sexualised/intimidating/offensive language

Whilst there is a wide spectrum here from inadvertent/thoughtless actions to those actions intended to enable abuse. It is essential that these low level concerns are fully addressed and appropriately recorded.

Process

Staff to inform the DSL of any safeguarding procedural concerns so that these can be checked and appropriate action taken/lessons learnt.

Staff to inform the Headteacher of any low level concerns about staff – Headteacher to complete internal informal investigation of concerns – Headteacher to determine if management expectation letter is required (in conjunction with RSL/HR as required) – Headteacher to record outcome on SAM.

The Headteacher (together with RSL/HR) will analyse trends for low level concerns to identify wider lessons learnt (i.e. whole academy/regional/trust-wide approach required such as additional staff training) and to ascertain if an individual member of staff poses a greater risk based on their reported low level concerns in conjunction with other relevant information (i.e. vetting checks etc). Where this is the case, further formal investigation and consultation with the LADO may be required.

Support

Staff will receive training around the concept of low level concerns and the process to follow to raise these concerns.

Staff are provided with the Trust's staff code of conduct and also receive specific training around safeguarding procedures, positive handling, managing behaviour and safer working practice.

The Trust's Whistleblowing Policy is shared with all staff so that they are clear on how to raise a concern.

The use of SAM enables the confidential, secure and consistent storing of all low level concerns/allegations together with enabling analysis of trends by those with appropriate access and knowledge to do so.

NOTE: Low level concerns will not be referred to in a reference unless they relate to issues that would normally be included (i.e. misconduct or poor performance).

Appendix 4: Role of the Designated Safeguarding Lead

The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and social-worker children). This should be explicit in the role holder's job description. **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 e-bulletins, 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.

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

Appendix 5:

Exemplar Job description Designated Safeguarding Lead

JOB DESCRIPTION

JOB TITLE:	Designated Safeguarding Lead (DSL)
LOCATION:	Based at the academy
REPORTING TO:	The Headteacher, the Regional Safeguarding Lead and the Regional Education Director
CONTRACT:	Permanent. Full time. With occasional travel to academies within the region and to other E-ACT academies.

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection (including online safety). The DSL will have a leadership position in the school. 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 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.
- Link closely with the three local safeguarding partners.

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 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
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- 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

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, and work with the Regional Education and Operations Directors (and their deputies), the system leader for safeguarding
- 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 school or college in this
- 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 information to the GRDs, the RPBs, the Trust, the National Director of Education.

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 or college hours) for staff in the school or college to discuss any safeguarding concerns.

PERSON SPECIFICATION

- We want everyone to **think big** for yourselves and for the world around you;
- We want everyone to **do the right thing** in everything you do, even when this means doing something that's hard, not popular or takes a lot of time;
- We want everyone to show strong **team spirit**, always supporting and driving your team forward

We really believe that if we all do the right thing, support our teams and we all think big, believe big, act big, then the results will be big too!

This means that if you want to be part of E-ACT, you need to be able to embrace and embody these values in all that you do.

OUR VALUES

Thinking Big	<ul style="list-style-type: none"> • Show energy, enthusiasm and passion for what you do • Demand the highest quality in all that you do, and in the work of your team • Willing to champion new ideas and think beyond the status quo • Show an ability to think creatively and ‘outside of the box’ in your area of expertise, continually seeking improvements in what you do to make the organisation better • Be open to new ideas and change where it will have a positive impact on the organisation • Show a willingness to embrace different ideas and ways of thinking to improve E-ACT • Ability to ‘look outside’ – to continually learn about innovations in your field, new ways of doing things, and bring that learning into your work • Commitment to self-development, and developing your wider Team • Ability to self-reflect on yourself, your performance, and to think about how this could be improved further • Ability to encourage ideas from others in order to improve the organisation and build your team’s confidence
Doing the Right Thing	<ul style="list-style-type: none"> • Have integrity and honesty in all that you do • Make decisions that are based on doing the right thing, even when this means that they’re unpopular or will lead to more work • Take responsibility and ownership for your area of work • Have difficult conversations or deliver difficult messages if that’s what’s required to do the right thing by our pupils • Be transparent and open • Be resilient and trustworthy • Stand firm and stay true to our mission
Showing Team Spirit	<ul style="list-style-type: none"> • Understand how you can have a greater impact as a team than you can as an individual • Understand how you are part of your immediate team but also a much wider organisational team, in working towards our mission • Recognise that everyone is important within E-ACT, and show an ability to build strong working relationships at every level • Recognise and celebrate the success and achievements, no matter how small, of your colleagues • Be generous with sharing your knowledge to help to develop others • Understand and be willing to receive suggestions and input on your area of work from others • Support your colleagues, even when this means staying a little later, or re-prioritising some of your work • Be aware of other peoples’ needs and show an ability to offer genuine support • Show an awareness and respect for peoples’ differences, and recognise how different characteristics and personal strengths build dynamic and great teams

Exemplar Job Description Deputy Designated Safeguarding Lead:

JOB DESCRIPTION

JOB TITLE:	Deputy Designated Safeguarding Lead (DDSL)
LOCATION:	Based at the academy
REPORTING TO:	The DSL, the Headteacher, the Regional Safeguarding Lead and the Regional Education Director
CONTRACT:	Permanent. Full time. With occasional travel to academies within the region and to other E-ACT academies.

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.

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
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- 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.

Availability

During term time the DDSL will always be available (during academy hours) for staff in the academy to discuss any safeguarding concerns. The DDSL will assume responsibility for safeguarding in the academy when the DSL is absent.

PERSON SPECIFICATION

- We want everyone to **think big** for yourselves and for the world around you;
- We want everyone to **do the right thing** in everything you do, even when this means doing something that’s hard, not popular or takes a lot of time;
- We want everyone to show strong **team spirit**, always supporting and driving your team forward

We really believe that if we all do the right thing, support our teams and we all think big, believe big, act big, then the results will be big too!

This means that if you want to be part of E-ACT, you need to be able to embrace and embody these values in all that you do.

OUR VALUES

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<p>Doing the Right Thing</p>	<ul style="list-style-type: none"> • Have integrity and honesty in all that you do • Make decisions that are based on doing the right thing, even when this means that they're unpopular or will lead to more work • Take responsibility and ownership for your area of work • Have difficult conversations or deliver difficult messages if that's what's required to do the right thing by our pupils • Be transparent and open • Be resilient and trustworthy • Stand firm and stay true to our mission
<p>Showing Team Spirit</p>	<ul style="list-style-type: none"> • Understand how you can have a greater impact as a team than you can as an individual • Understand how you are part of your immediate team but also a much wider organisational team, in working towards our mission
	<ul style="list-style-type: none"> • Recognise that everyone is important within E-ACT, and show an ability to build strong working relationships at every level • Recognise and celebrate the success and achievements, no matter how small, of your colleagues • Be generous with sharing your knowledge to help to develop others • Understand and be willing to receive suggestions and input on your area of work from others • Support your colleagues, even when this means staying a little later, or re-prioritising some of your work • Be aware of other peoples' needs and show an ability to offer genuine support • Show an awareness and respect for peoples' differences, and recognise how different characteristics and personal strengths build dynamic and great teams

Appendix 6: Local Safeguarding Arrangements

For further information on 'Children First Northamptonshire':

<https://www3.northamptonshire.gov.uk/councilservices/children-families-education/help-and-protection-for-children/Pages/default.aspx>

If there is no immediate danger but you are concerned about a child's welfare, please contact: 0300 126 1000.

For the Multi-Agency Safeguarding Hub (MASH) and Child Protection Team please contact:

Children, Families and Education

Criminal Justice Centre

700 Pavilion Drive

Northampton

NN4 7YL

T: 0300 126 1000 (option 1)

E: MASH@northamptonshire.gcsx.gov.uk

For The Designated Officer (formerly known as the Local Authority Designated Officer or LADO), please contact: LADOReferral@northamptonshire.gov.uk

Signs of Safety is an internationally successful model which will transform the way we work with children and families across Northamptonshire. The model is about building relationships and working together; with families and children, professionals and colleagues, and identifying together areas that need to change, including worries and risk, whilst focusing on strengths, resources and networks. In November 2017, Northamptonshire County Council launched Northamptonshire's Signs of Safety journey with their staff and partners. At these events organisational strengths, danger statements (key areas we're worried about that Signs of Safety can help with), and organisational goals (what needs to be put into place to no longer be worried) were explored.