



## The de Ferrers Trust

# Safeguarding/Child Protection Policy

Author:	Director of Safeguarding
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Consultation required	CEO/Principals/LGB
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## **Our Vision**

To ensure that all the children and young people in our care have the opportunity to fulfil their potential through achieving highly, regardless of their ability or background.

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## 1. Named staff and contacts

### Trust

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## 2. Safeguarding Commitment

At The de Ferrers Trust the safeguarding of the children in our care is of paramount importance. Safeguarding children is every member of staff's responsibility. When children feel safe they are more likely to feel happy and this in turn supports them being able to learn to the best of their ability, supporting our vision statement for each and every child who comes into our Trust to have the opportunity to fulfil their potential through achieving highly, regardless of their ability or background.

Within each school, staff encourage children and parents/carers to feel free to talk about any concerns and to see their school as a safe place when there are difficulties. Children's worries and fears will be taken seriously and children are encouraged to seek help from members of staff.

Each school will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to;
- Ensure that children know that there are adults in the school whom they can approach if they are in difficulty;
- Include in the curriculum activities and opportunities for Personal, Social and Health Education (PSHE), Relationship and sex education and Citizenship which equip children with the skills they need to stay safe from abuse (including online abuse) and to know to whom they can turn for help;

- Ensure every effort is made to establish effective working relationships with parents/carers and colleagues from other agencies;
- Establish and maintain a training record of all staff within each school which shows compliance with mandatory safeguarding training and the requirements for all staff to read part one of Keeping Children Safe in Education 2021 (KCSIE). Within the Trust regular safeguarding training is at least annual with updates delivered via staff meetings and bulletins on a weekly basis.
- Operate safer recruitment procedures and make sure all appropriate checks are carried out and recorded on the single central record for new staff and volunteers who will work with children, including identity check, right to work, enhanced DBS criminal record and barred list (and overseas where needed), references, and prohibition from teaching or managing in schools (s.128) etc.
- Ensure all third party contractors/sub-contractors and agency staff are subject to the same vetting procedure and that written assurance from all those associated with the Trust in this way is sought and recorded in a Trust central folder which is accessible to those staff members who need to check visitor requirements. The Trust Compliance and Safeguarding Teams having oversight of this alongside the single central record.

### **3. Purpose of this policy**

The purpose of this policy is to provide an umbrella summary around the aspects of safeguarding and child protection that are common across the Trust. This policy will act as the main safeguarding and child protection policy for each school within the trust.

Additionally, each school within the Trust will have a site-specific Safeguarding and Child Protection annex which should be read in conjunction with this policy and which will be published alongside this policy on their website. This annex document details information exclusive to each school.

This policy applies to all staff, volunteers, governors and trustees as well as to all visitors. We will ensure that all parents and other working partners are aware of our safeguarding and child protection policy by displaying it on our website and the websites of each individual school within the Trust, by displaying appropriate information within our school's reception areas, and by raising awareness at parent's evenings and other appropriate meetings with parents/carers.

There are four main elements to our Safeguarding/ Child protection Policy. All of which are underpinned by KSCIE 2021

- Prevention – (e.g. positive school atmosphere, teaching and pastoral support to pupils, safer recruitment procedures)

- Protection – (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding and child protection concerns)
- Support – (to students and school staff and to children who may have been, or are being harmed or abused)
- Working with parents/carers – (to ensure appropriate communications and actions are undertaken)

## 4. The law and national framework

The requirements of the Trust and each school to safeguard and promote the welfare of all children is embedded in legislation and government and local authority guidance. The de Ferrers Trust works within both Derbyshire and Staffordshire local authorities. This policy is in line with all those requirements.

The government guidance 'Working Together to Safeguard Children – July 2018' and 'Keeping Children Safe in Education – 2021' are the essential national safeguarding documents and give practical guidance on implementing legal requirements. Each school will ensure these documents are available for all staff.

Keeping Children Safe in Education 2021 now applies to all providers of post 16 education as set out in the Education and Training (Welfare of Children) Act 2021.

Additionally, all staff have access to copies of 'What to do if you are worried a child is being abused – March 2015' and the 'Guidance for safer working practice for those working with children and young people in education settings – May 2019'

All adults working within the trust will take part in listening to are issued with their own copy of Part 1 of Keeping Children Safe in Education 2021 and where appropriate Annex A will be read to those staff who are deemed not to require the full part one. This will occur during annual staff safeguarding training sessions and time will be given during training sessions for staff to read this document and all staff must confirm that they have both participated by listening, or read and understood the document.

The Trust Safeguarding and Child Protection Policy, and the individual school Safeguarding and Child Protection annexes and the national and local government guidance is compatible with the following legislation:

- The Children Act 1989 and 2004
- The Children and Social Work Act 2017
- The Education Act 2002
- The Education and Training (Welfare of Children Act) 2021

## 5. Local Arrangements

There are two local authorities within which the trust works.

The Staffordshire Safeguarding Children's Board and the Derby and Derbyshire Safeguarding Children Partnership.

These were set up in response to the government legislation contained within the Children and Social Work Act 2017 for new safeguarding partner arrangements to be in place by September 2019.

The new partner arrangements include the local authority, a clinical commissioning group and the police. These three agencies will work together to promote the welfare of local children including identifying and responding to their needs.

More information can be found here:

<https://www.staffsscb.org.uk>

<https://www.ddscp.org.uk>

## **6. Extended school activities**

Where schools provide services or activities directly under the management or supervision of school staff, the schools arrangements for child protection and safeguarding will apply. Where services or activities are provided separately by another body, the individual school will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and that there are arrangements to liaise with the individual school on these matters where appropriate. This is not an exhaustive list:

## **7. Safeguarding in the curriculum**

Children are taught about safeguarding in school including online, through various teaching and learning opportunities, as part of a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. The following areas are among those addressed in personal, health, social and emotional, (PHSE) and the wider curriculum in an age appropriate manner:

Child abuse and neglect, the four main categories

Bullying (including cyberbullying)

Peer on peer abuse including harmful sexualised behaviour

Drugs, alcohol and substance abuse (including awareness of County Lines and the criminal exploitation of children)

Internet safety including content, contact and conduct issues including online safety at home

Stranger danger

Healthy relationships/consent

Domestic abuse

(so called) Honour based abuse, forced marriage, female genital mutilation (see Appendix 5)

Sexual exploitation of children (CSE) including online  
Child criminal exploitation  
Preventing Extremism and Radicalisation (see Appendix 3 and 4)  
Relationship and sex education

## **8. Support to pupils and Trust staff**

Support to pupils – The schools within the Trust recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view their lives in a positive way. For such children school may be one of the few stable and secure and predictable components of their lives. Other children may be vulnerable because, for instance, they have a disability, or they are in care, a care leaver, or previously looked after, or are experiencing some form of neglect. Our schools seek to remove any barriers that may exist in being able to recognise abuse or neglect in pupils with special educational needs or disability. We will seek to provide such children with the necessary support to and to build their self-esteem and confidence. The context in which safeguarding incidents occur and/or behaviours occur, whether in school or outside (including online), will be considered by staff, particularly the Designated Safeguarding Lead (DSL) and Deputy DSLs. Any associated threats or risks will be included in assessments and relevant information included in referrals to Children’s Social Care (this is known as contextual safeguarding).

**Mental Health** – All staff will be made aware during training sessions that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff will receive training on how these children’s experiences, can impact on their mental health, behaviour and education. Each school within the trust will detail in their individual annexes to this policy what the system is within their setting to identify possible mental health problems, including routes to escalate and clear referral and accountability systems.

**Children potentially at greater risk of harm** – Children who need a social worker due to safeguarding or welfare needs are potentially at greater risk of harm. A child’s experience of adversity and trauma, neglect and complex family circumstances can leave them vulnerable to further harm as well as educationally disadvantaged and facing barriers to attendance, learning and mental health. Where the Local Authority determine a child needs a social worker this information will be shared with school and the DSL will use that information to inform decisions about safeguarding which may include responding to unauthorised absence or missing education where there are known risks. Additionally, the DSL will consider additional pastoral or academic support alongside the actions of statutory services.

### **Peer-on-peer abuse**

## Definitions

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children (under the age of 18) and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations. It can happen both inside and outside of school and online.

Peer-on-peer abuse can take many forms, including (but not limited to):

- serious bullying (including cyber bullying)
- relationship abuse (abuse in intimate relationships between peers)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images or videos (also known as sexting or youth produced sexual imagery)
- youth and serious youth violence
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- harmful sexual behaviour and/or prejudiced based violence including, but not limited to, gender-based violence.

Online peer on peer abuse is any form of peer-on-peer abuse with a digital element, for example, sharing youth produced sexual imagery, online abuse, coercion and exploitation, peer-on-peer grooming, threatening language delivered via online means, the distribution of sexualised content and harassment.

All staff will be able to recognise through training sessions that children sometimes display abusive behaviour themselves and that all such incidents or allegations should be addressed and referred on for appropriate support and intervention. Such abuse will not be tolerated in our schools and will never be passed off as 'banter', part of growing up, or 'boys being boys'.

It should also be recognised by all staff that the behaviour in question is harmful to both the perpetrator (who is a child) and the victim.

There are separate school and local authority guidance documents and policies to support schools to address these concerns, listed below, and including the school's own Student Behaviour Policy, Anti-bullying Policy, and Online Safety Policy. Where specific risks are identified, a risk assessment will be undertaken in order to ensure the safety of all staff and pupils and to offer appropriate support.

Keeping Children Safe in Education 2021 Part 5

Sexual violence and sexual harassment between children in schools and colleges 2021

National Police Chiefs Council 'When to call the police'

UK Council for Internet Safety - Sharing Nudes and Semi-Nudes – Advice for education settings working with children and young people

The Brook Traffic Light Tool for sexual behaviours

DfE – Behaviour and discipline in schools 2016

DfE – Mental health and behaviour in schools 2018

Our duty of care may also, in some circumstances, extend to incidents that occur outside of school hours if the impact of that experience affects the child at school. The school will take appropriate action and respond to incidents brought to our attention whether they occur in the community, in the home or online and this action could involve reporting to the police if the information reported indicates criminal activity having taken place.

Up skirting is now a criminal offence (The Voyeurism (Offences) Act came into force 12/4/2019 and is included under peer-on-peer abuse. This is the act of taking a picture under a person's clothing without their knowledge or consent with the intention of viewing their genitals or buttocks causing the victim distress, humiliation, or alarm. Anyone of any gender can be a victim.

Peer-on-peer abuse can sometimes take the form of harmful sexual behaviour and following on from the Ofsted report into sexual abuse in schools June 2021 The de Ferrers Trust introduced specific training to support staff in being able to identify this behaviour and respond appropriately. The Trust takes the approach that 'it does happen here' whether staff are aware or not and have restructured the safeguarding reporting structure to include peer-on-peer abuse and harmful sexual behaviour in the CPOMS (Child protection online monitoring system) which all staff receive training on and ongoing advice and support throughout the year via briefings and bulletins.

This training, delivered to all staff at the start of the academic year (and annually thereafter) will assist staff in their understanding that just because there may be no reports in schools it does not mean that this kind of abuse is not happening and that they must be alert to the indicators and signs of peer-on-peer abuse, how to identify it and how to respond to it which will be covered in annual training.

### **Preventative strategies**

Each school will:

- Create an environment where staff model respectful and appropriate behaviour
- Understand which areas of their school may be more vulnerable due to location and accessibility and increase staff monitoring and supervision in these areas

- Educate children so they are clear about what is acceptable and unacceptable behaviour
- Ensure children know where to go and who to ask for help if they need it, and feel confident to do so
- Ensure the curriculum is enriched with activities and opportunities for personal, social and health education, relationships and sex education in line with the government guidance which will begin to equip children with the skills they need to stay safe from abuse
- Ensure any report of peer-on-peer abuse and/or harmful sexual behaviour is consistently responded to and reported on CPOMS in a timely manner and risk assessments and safety plans, where necessary, are completed and accessible and understood by the relevant staff
- Embedding into each school a culture of zero tolerance towards any form of peer-on-peer abuse highlighted this in assemblies, talks, form time, staff on duty at break and lunch times to consistently maintain the standard in regard to this
- Include sanctions where appropriate when responding to incidents to reinforce a culture where peer-on-peer abuse is not tolerated
- Seeking student voice regularly to identify their understanding and expectation and experiences

### **Responding to an incident**

It is important that staff do not dismiss any report of peer-on-peer abuse as ‘banter’ or ‘part of growing up’ as this supports a culture of normalising such behaviour and can lead to an escalation of behaviours both within and outside school.

Staff should not compare any experience they are told about by a child or young person to anything they may have experienced within their own childhood.

- School will follow their own behaviour and anti-bullying policies supported by the DfE guidance, ‘Keeping Children Safe in Education’ September 2021 and ‘Sexual violence and sexual harassment between children in schools and colleges’, September 2021
- School DSLs and pastoral teams have the support of the Sexual Behaviours Brook Traffic Light Tool which helps safeguarding staff and school leaders to correctly identify concerning sexual behaviour in children and young people and take the appropriate action to safeguard them which may include risk assessments and safety plans
- We will liaise with the police, social care and parents/carers as appropriate
- We will offer support to both the victim(s) and perpetrator(s).
- Parents/carers will be included in discussions about the format that this support will take

Signposting will be available in all schools to children and young people in the event that they don’t feel confident raising an issue with staff. It is useful for all schools to

have a resource board with support services on a wide range of issues so children and young people can seek out external support instead of, or in addition to, the support they access at school. External support services can also be brought in from time to time to highlight specific issues and support the prevention of peer-on-peer abuse.

It is useful to ensure children and young people are part of changing culture and that the procedures within schools can be impacted by them. Schools should regularly seek to gain the views of the children and young people in their setting by developing a framework for gathering student voice on peer-on-peer abuse between children and young people as this will then demonstrate to the school any impact and change of culture and how safe children and young people feel whilst at school and any further work that may need to be undertaken.

**Youth produced sexual imagery** - School will always respond if informed that children have been involved in youth produced sexual imagery and will follow the advice contained in The UK Council for Internet Safety (UKCIS) guidance, 'Sharing nudes and semi-nudes' Advice for education settings working with children and young people responding to incidents and safeguarding children and young people. More details of this are contained in the peer-on-peer abuse policy.

'Sharing nudes and semi- nudes': definition

Sending or posting the nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The term 'nudes' is used as it is most commonly recognized by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may occur where:

- Children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- Children and young people digitally manipulate an image of a young person into an existing nude online
- Images created and shared are used to abuse peers e.g by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

It is important to remember that creating nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal and this needs to be considered in the response to each individual incident. The relevant legislation is contained in the Protection of Children Act 1978 as amended in the Sexual Offences Act 2003. Specifically:

- It is an offence to possess, distribute, show and make indecent images of children
- The Sexual Offences Act 2003 defines a child, for the purposes of indecent images, as anyone under the age of 18

'Indecent' is not defined in legislation however the following images are likely to be defined as such by a jury, magistrate or judge and therefore by schools if we become aware that the image contain:

- nude or semi-nude sexual posing e.g displaying genitals and/or breasts or overtly sexual images of young people in their underwear
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal (s33 Criminal Justice and Courts Act 2015)  
Incidents can be broadly divided into two categories:

**Aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can be further sub-categorised into:

- **Adult involved:** adult offenders attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the internet. The images may be solicited by adult offenders.
- **Youth only – intent to harm:** these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people.
- **Youth only – reckless misuse:** no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.

**Experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can be further categorised into:

- **Romantic:** incidents in which young people in ongoing relationships make images for themselves and each other, and images were not intended to be distributed beyond the pair.
- **‘sexual attention seeking’:** the phrase ‘sexual attention seeking’ is taken directly from the typology however it is important to note that incidents of this category can be part of a normal childhood. A child or young person should not be blamed for taking and sharing their image.
- **Other:** cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the ‘Romantic’ or ‘Attention Seeking’ sub-types. These involve either young people who take pictures for themselves (no evidence of any sending, sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

### **Responding to Incidents**

The National Police Chiefs Council ‘When to call the police’ has made it clear that incidents involving sharing nudes and semi-nudes between children should have an immediate safeguarding response. In many cases schools will respond to incidents without involving the police, for example where an incident can be defined as ‘experimental’ and there is no further evidence of abusive or aggravating elements. Where such elements exist incidents will always be referred to the police through the Multi Agency Safeguarding Hub.

All staff will first refer any such incident to the DSL as soon as possible. The DSL will hold initial review meetings with those involved and with the children or young people involved, in most cases, images or videos will not be viewed. Parents and carers will be informed at an early stage and involved in the process in order to best support the child unless there is good reason to believe that involving them would put the child or young person at risk of harm. A referral to children’s social care and to the police will be made if there is a concern that a child or young person has been harmed or is at risk of immediate harm.

The guidance sharing nudes and semi-nudes is used to respond to incidents and guides the school’s response on a case-by-case basis with the emphasis always on safeguarding the child and responding in the child’s best interests.

The safeguarding teams across the trust have regular training on the above both in their own school teams and in the Trust safeguarding meetings which occur termly.

### **Curriculum**

Planned PHSE and relationship and sex education (RSE) will include ‘healthy and respectful behaviours’. This will be appropriate to pupils’ age and stage of development. It will also be underpinned by the school’s behaviour policy and pastoral support system. In addition the safeguarding team will take opportunities to embed

further learning by delivering assemblies with a safeguarding theme that will run alongside the planned PHSE and RSE curriculum teaching.

**Sexual violence and sexual harassment** – Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003, including rape and sexual assault. Sexual harassment is ‘unwanted conduct of a sexual nature’ that can occur online and offline and may include sexual name-calling, taunting or “jokes” and physical behaviour, for example, deliberately brushing against someone or interfering with clothes. Evidence shows that girls, children with special educational needs and disability (SEND) and lesbian, gay, bisexual, transgender and queer or questioning (LGBTQ) children are more likely to be the victims of sexual violence and harassment and boys are more likely to be the perpetrators. However, sexual violence and sexual harassment can occur between children of any gender.

### **Curriculum**

- Planned PHSE and relationship and sex education (RSE) will include ‘healthy and respectful behaviours’. This will be appropriate to pupils’ age and stage of development. It will also be underpinned by the school’s behaviour policy and pastoral support system.

### **Responding to an incident**

- School will follow the DfE guidance, ‘Sexual violence and sexual harassment between children in schools and colleges’, September 2021.
- School DSLs and pastoral teams have the support of the Sexual Behaviours Brook Traffic Light Tool which helps safeguarding staff and school leaders to correctly identify concerning sexual behaviour in children and young people and take the appropriate action to safeguard them.
- We will liaise with the police, social care and parents/carers as appropriate.
- We will offer support to both the victim(s) and perpetrator(s). Parents/carers will be included in discussions about the format that this support will take.

### **Online Safety**

The de Ferrers Trust takes a whole trust approach to Online Safety to protect children from accessing potentially harmful and inappropriate content online and this is contained within the Trust Online Safety Policy. The safeguarding issues are categorized into four main areas of risk:

1. **CONTENT:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalization and extremism.
2. **CONTACT:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
3. **CONDUCT:** personal online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images (e.g.

consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

4. **COMMERCE:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Online safety is a running and interrelated theme and all staff receive training appropriate to their role on an annual basis. The Trust recently invested in more advanced software (Lightspeed) to better protect children whilst online at school and whilst using their school ipads at home. The Trust invested in a subscription for all schools in the National Online Safety platform and this allows any parent or carer access to a range of materials which are updated regularly and designed to offer parents and carers training, advice and guidance on how to support online issues their child may be facing. Each school's individual annex will detail how parents can access this resource free of charge.

### **Serious Violence**

All staff will be made aware through training and regular safeguarding briefings of the indicators which may signal that 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, a significant decline in academic performance, signs of self-harm and/or significant changes in well-being.

All staff will be made aware of the range of risk factors which increase the likelihood of involvement with serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced previous child abuse and having been involved in offending.

**Children Missing** – our Trust recognises the entitlement that all children have to education and will work closely with the local authorities to share information about pupils who may be missing out on full-time education or who go missing from education. The local authority for the individual school will also be informed where children are to be removed from the school register a) to be educated outside the school system; b) for medical reasons; c) because they have ceased to attend; d) because they are in custody; d) because they have been permanently excluded. We also recognise that children who go missing is a sign that they may have been targeted by Child Sexual Exploitation perpetrators and/or drug related criminals (County Lines). Children may also be groomed into participating in other forms of criminal exploitation. Children who attend an alternative education provision are more likely to be vulnerable to these forms of abuse.

Knowing where children are during school hours is an extremely important aspect of Safeguarding. We monitor attendance carefully and address poor or irregular attendance without delay.

Parents/carers should ensure that school has at least two emergency contacts for their child and that these are regularly reviewed to ensure they are up to date.

**Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** are both forms of abuse and both occur where an individual or a group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal

activity. Whilst age can be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, The abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it can take place on and off line.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however all staff working within the trust will have training to ensure they are aware of the risks to girls of criminal exploitation and also that both boys and girls who are criminally exploited are at higher risk of sexual exploitation.

CSE is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any child and this includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited and may feel they are in a genuine romantic relationship.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point or are targeted by criminals involved in the illegal supply of drugs (County Lines). Staff training includes raising awareness of these issues and any concerns are passed to the Designated Safeguarding Lead who will make a risk assessment and refer to Local Authority First Response Children's Duty if appropriate.

**County Lines** – County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK) using dedicated mobile phone lines. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store, drugs and money. 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.

### **Domestic Abuse**

In April 2021 The Domestic Abuse Act received royal assent. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous

cross-government definition ensures that different types of relationships are captured, including ex-partners and family members.

The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing 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.

### **Operation Encompass**

Operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day.

Domestic Abuse – any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may have had to leave the family home as a result.

### **Child Trafficking**

Child Trafficking is a form of modern slavery. It's defined as recruiting, moving, receiving and harbouring children for the purposes of exploitation. Child trafficking is a form of modern slavery. Children are trafficked for many reasons, some for child sexual exploitation, others for forced labour, and criminal activity and forced marriage. Children who are trafficked are often exploited in more than one way. Children may be groomed, tricked or persuaded to leave their homes to be trafficked and child

trafficking often involves networks of organised criminals as well as individuals and children's own families. Child trafficking is child abuse and the response to any concern of child trafficking will be a child protection multi agency one in line with current legislation.

**So-called 'honour-based' abuse (HBA)** encompasses crimes which have been committed to protect or defend the so-called 'honour' of the family and/or the community, including Female Genital Mutilation (FGM) (see appendix 5), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and concerns will be passed to the Designated Safeguarding Lead for onward referral as required.

**Private fostering arrangements** - Where a child under 16 (or 18 with a disability) is living with someone who is not their family or a close relative for 28 days or more, staff inform the Designated Safeguarding Lead so that a referral to Children's Social Care for a safety check, can be made. (A close relative includes step-parent, grandparents, uncle, aunt or sibling).

Complaints or concerns raised by parents/carers or pupils will be taken seriously and followed up in accordance with the school's complaints process.

**Fabricated Induced Illness (FII)** is a form of child abuse and it occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in the child. The parent may present the child as ill when they are health, deliberately induce symptoms of illness, manipulate test results, or exaggerate or lie about symptoms. FII is child abuse and will be reported as such to social care without the parent being alerted by the school.

### **Support for Staff**

As part of their duty to safeguard and promote the welfare of children and young people, staff may hear information, either from the child/young person as part of a disclosure or from another adult, that will be upsetting. Where a member of staff is distressed as a result of dealing with a child protection concern, he/she should in the first instance speak to the Designated Safeguarding Lead about the support they require. The Designated Safeguarding Lead should seek to arrange the necessary support.

The mental health of all our staff is very important to us and in addition to the external support offered via HR for the mental health of all staff the Trust also has a supervision structure in place for all those who work within safeguarding and including the academy principals and this includes regular supportive sessions with their line management and external clinical supervision where required.

## **9. Working with parents/carers**

Each school will:

- Ensure that parents/carers have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus.

- Undertake appropriate discussion with parents/carers and seek necessary consent prior to involvement of Children & Family Services Children's Social Care or another agency, unless to do so would place the child at risk of harm or compromise an investigation.

### **Other Relevant Policies and DfE Guidance**

The statutory responsibilities of individual governing bodies for safeguarding the welfare of children goes beyond simply child protection. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies and guidance, for instance:

- Student Behaviour Policy
- [DfE Sexual Violence and Sexual Harassment between children in Schools and Colleges 2021](#)
- [DfE Mental Health and Behaviour in Schools](#)
- [DfE and ACPO \(Association of Chief Police Officers\) Drugs advice for schools](#)
- [National Police Chiefs Council 'When to Call the Police'](#)
- [DfE Preventing and Tackling Bullying](#)
- Peer on Peer Abuse Policy
- Staff Code of Conduct [and the Guidance for Safer working practice for those working with children and young people in education settings May 2019](#)
- Racist incidents
- Anti-Bullying (including Cyberbullying)
- Physical Interventions/Restraint [DfE Guidances 'Use of Reasonable Force'](#) and the [DfE Screening, searching and confiscation](#)
- Special Educational Needs and Disability Policy
- Trips and visits
- Work experience and extended work placements
- Medical Policy
- Health and Safety
- Relationships and Sex Education
- Site Security
- Equal Opportunities
- Toileting/Intimate care
- Online Safety Policy
- Extended school activities

The above list is not exhaustive, but when undertaking development or planning of any kind, the school will consider the implications for safeguarding and promoting the welfare of children.

## **10. Records, monitoring and transfer**

Well-kept records are essential to good child protection practice. All staff are clear about the need to report and record concerns about a child or children within each school. Records of concerns are written onto the online system 'CPOMS' (Child Protection Online Monitoring System) which then come immediately to the attention of the safeguarding team within each school. These concerns can then be managed by each safeguarding team and actions taken depending on the level of the severity of the concern.

If a concern is written down by a child or by a member of staff these written concerns can be scanned onto the system and once the concern has been logged and any such document created by a child disclosing abuse should be handed to the Designated Safeguarding Lead without delay.

If a concern is thought to be urgent the member of staff logging this on 'CPOMS' must also urgently seek out the Designated Safeguarding Lead or one of the Deputy Designated Safeguarding Leads and explain in person, the disclosure and situation leading up to it.

The safeguarding records on CPOMS are confidential to the safeguarding team and other supporting staff in each school who have an operational need for sensitive information. e.g., Designated Teacher for Looked After Children, School attendance welfare officer.

Child protection records are reviewed regularly by the safeguarding team to check whether any action or updating is needed.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare including their educational outcomes. All schools have clear powers to share, hold and use information for these purposes.

When children transfer school, their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and will be sent directly to the Designated Safeguarding Lead in the receiving school or sixth form with any necessary discussion or explanation and a signed and dated record of the transfer is kept. If the receiving school has CPOMS this is done electronically via CPOMS. If not the CPOMS chronology of event is downloaded, password protected and sent electronically to the receiving school. Where a child needs specific support or has an open child protection plan, relevant information will be transferred prior to the child arriving at their new school in whatever way is considered appropriate; this may be a transition meeting between the schools if they are local to one another. If physical files have to be sent through the post they will be sent by recorded delivery.

## **11. Definitions**

'Keeping Children Safe in Education 2021' defines safeguarding and promoting the welfare of children as:

- Protecting children from maltreatment;

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

Child protection is defined as:

- Part of safeguarding and promoting welfare; and
- The activity to protect specific children who are suffering, or who are likely to suffer, significant harm.

## **12. Roles and Responsibilities**

### **All Staff**

All Trust staff will:

- make sure they have undertaken the appropriate training for their role; This includes induction training at the start of their employment which is incorporated into a Trust Safeguarding Booklet that is given on induction and training on this policy, the code of conduct, the role of the DSL and DDSLs and what to do if they are concerned about a child. In addition all staff receive training on how to report a concern to the safeguarding team and the operation of the online reporting system CPOMS (child protection online monitoring system) which is used consistently in each school in the Trust. Any staff member who has an urgent concern should seek out the DSL or a deputy to inform them as soon as possible verbally the nature of the urgent concern in order for the DSL/DDSL to act on it without delay. This should then be followed up in writing on the CPOMS system. If the DSL/DDSL is not available the staff member should speak to a member of the leadership team or take advice from the local children's social care.
- take responsibility to report any concerns, no matter what their role;
- ensure they have access copy of part 1 of Keeping Children Safe in Education 2021 (located in the staff CPOMS library) and that they have either been in a session where it has been played to them or they have read and understand it;
- ensure they are aware of the contents of this policy and the relevant safeguarding annex associated with their setting, the relevant behaviour policy for their setting, and the policy for Children Missing Education, the staff code of conduct, the guidance for safer working practice for those working with children

and young people in education settings, May 2019, and the government guidance 'What to do if you're worried a child is being abused'.

- be aware of the need to minimise their own vulnerability in not being alone with children or in situations that could render them vulnerable to poor practice and/or allegations against them; and
- always be aware of the needs of young people and be vigilant for any possible signs of abuse.

## **Designated Safeguarding Leads**

The Designated Safeguarding Lead (DSL) is the member of the school's Senior Leadership Team, who is responsible for the strategic leadership of safeguarding within that school. The DSL is the person to whom staff should pass their concerns and who will ensure a practical and efficient way of dealing with those concerns. The DSL will:

- ensure an open and efficient route for staff to bring concerns to them of any sort and to have their concerns taken seriously;
- ensure they are appropriately trained to carry out the role;
- support staff in ensuring they receive appropriate training;
- promote the procedural pathway within the school, so staff are aware of the way to report concerns;
- ensure the school procedures are followed and adhered to with regard to referring a child if there are concerns about possible abuse;
- offer clear advice and support to staff bringing concerns or needing help;
- consider whether concerns referred to him/her need to be referred to Children's Services Social Care;
- offer appropriate feedback as necessary as to the progress of the concern;
- maintain clear records of concerns about a child, even if there is no need to make an immediate referral and keep a record system to ensure consistency;
- discuss with the Principal any complex concerns;
- ensure that all such records are kept confidentially and securely and are separate from pupil records; Each school operates an online referral system called 'CPOMS';

- ensure those particular complex cases are referred without delay, and especially where it involves a child or young person subject to a child protection plan;
- follows the local safeguarding board's escalation policy where cases are not progressing in an acceptable manner; and
- gather, collate and analyse, as appropriate, all relevant information for purposes of quality assurance.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.

## **Deputy Designated Safeguarding Lead(s)**

Each school within the Trust will appoint at least one Deputy Designated Safeguarding Lead who will formally provide cover and additional capacity for the DSL. Each Deputy DSL will be trained to the same level as the DSL. In the event of the long-term absence of the DSL, the Principal will identify a Deputy DSL to undertake the duties of the DSL listed above.

## **The School Principal**

The Principal in each school is responsible for ensuring the Designated Safeguarding Lead is effective in their role of providing and accessing high quality services to safeguard and promote the welfare of children and young people accessing provision from their school, including:

- Ensuring that the procedures and policies adopted by the governing body are effectively followed by all staff;
- Allegations of abuse or concerns that a member of staff or adult working at the school may pose a risk of harm to children are notified to the Local Authority Designated Officer (LADO);
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline is also available (0800 0280285);
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care or the Police.

- Offer day to day support and guidance to the DSL as necessary;
- Oversee the promotion of safeguarding throughout the school, ensuring all staff are appropriately trained and aware of their responsibilities;
- Ensure cover is provided where necessary in the absence of the DSL;
- Offer supervision to the DSL in relation to their role and decisions made;
- Ensure that an appropriate member of teaching staff is designated as the person in charge of Looked After Children and receives relevant and up to date training;
- Encourage pupils and parents to inform the school of any concerns;
- Ensuring children know who to go to if they need support;
- Ensure all recruitment procedures follow safeguarding best practice based on advice from the Director of HR;
- Contribute, as appropriate, to quality assurance processes; and
- Ensure sufficient allocation of time is given to DSLs to undertake the role.
- Deal with concerns about staff that meet the harm threshold as well as those that do not, see Appendix 2.

## **The School Senior Leadership Team**

The School Senior Leadership Team will support the Principal to discharge the duties to safeguard children and young people.

The School Senior Leadership Team will:

- Promote the importance of safeguarding throughout the school;
- Oversee the effectiveness of safeguarding systems, especially procedures, and review and report any changes that are required;
- Support the work of the DSL to ensure an effective process for dealing with concerns; and
- Ensure that the school fulfils its statutory duty to co-operate with other agencies and that the chain of accountability is clear from front line to senior level.

## **The Trust**

The Trust Safeguarding Team will provide strategic leadership within The de Ferrers Trust for all aspects of safeguarding children and young people.

The Trust Safeguarding Team will:

- Ensure that all training, policies and procedures are reviewed and updated in line with national and local requirements and appropriate changes disseminated to all schools;
- Ensure that there are systems in place to support the effective management of safeguarding, especially the role of the DSLs, training for all staff and supervision as appropriate;
- Ensure that there is available to the school Principal's someone who can offer appropriate external advice and support with safeguarding concerns especially when they are complex and/or relate to allegations against staff;
- Ensure Quality Assurance processes are in place and oversee the information they produce, to measure the progress and effectiveness of existing safeguarding frameworks; and
- Produce information to the Trust Board in relation to Safeguarding, in order to ensure that the Board can demonstrate that it is discharging its safeguarding obligations appropriately.
- The Trust now has a Mental Health Lead, Mark Hurst, based at The Pingle Academy who is leading on such advice and provision and also plays a key training role within the Trust as a Mental Health First Aid Trainer.

## **The Executive**

The Chief Executive, as Accounting Officer, through line management, will provide appropriate challenge and support to the Trust Safeguarding Team to ensure the Trust and the school's it sponsors are taking all opportunities to safeguard and protect the children and young people who access their services.

## **13. Governance of Safeguarding**

The de Ferrers Trust has appointed a Trustee to take leadership responsibility for the Trust's safeguarding arrangements.

The day to day leadership of safeguarding is delegated to the Trust Safeguarding Team, under the leadership of the Safeguarding Director, who will work with Principal's and DSLs to ensure that all statutory duties are fulfilled.

The Trust Safeguarding Team provides regular reports to the Trustee with responsibility for safeguarding and the Trust Board. These reports are annual and the content will cover the number and type of referrals made and the outcomes of those referrals and any concerning trends this may represent and what actions will be taken to address this.

The role of the Safeguarding Trustee is to provide appropriate challenge and support to the Executive and Trust Safeguarding Team, to ensure that they are satisfied that the Trust is fulfilling its safeguarding duties identified in the statutory guidance Keeping Children Safe in Education 2021.

Quality assurance to ensure that safeguarding practices and procedures are robust in supporting and safeguarding the children and young people who access services from the de Ferrers Trust.

The governing body of each school in accordance with the statutory guidance 'Keeping Children Safe in Education' September 2021, will ensure that;

- The school has this policy as well as their individual annex to this policy in place and that procedures and training which are effective and comply with the law at all times. The policy and annex will be made available publicly.
- The school operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. The same written assurances are gained from third party providers that the appropriate checks have taken place by them before any contractor/sub-contractor or agency staff are permitted on any school site. Furthermore, the Principal, nominated governors and other staff involved in the recruitment process have undertaken Safer Recruitment Training.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers (see Appendix 2).
- There is a senior member of the school's leadership team who is designated to take lead responsibility for dealing with child protection (the 'Designated Safeguarding Lead') and there is always cover for this role with appropriate arrangements for before/after school and out of term activities.
- The Designated Safeguarding Lead undertakes effective Local Authority training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via safeguarding briefings etc. Updates and support are also provided by the Trust Director of Safeguarding and County Safeguarding Lead.
- The Principal and all other staff and volunteers who work with children (including early years practitioners within settings on the school site), undertake appropriate training, which is regularly updated (at least every three years). New staff and volunteers who work with children are made aware of the

schools' arrangements for child protection and their responsibilities (including this policy, the most current part one of Keeping Children Safe in Education, the student behaviour policy and how to respond if children go missing). All staff are provided with an induction within seven days of joining and part one of Keeping Children Safe in Education is provided to all staff working directly with children and they are given time within training sessions to read this.

- The Trustee for Safeguarding, The individual school governor with responsibility for safeguarding (as appropriate) and the Director of Safeguarding deals with any allegations of abuse against the Principal in liaison with the local authority designated officer (LADO).
- Effective policies and procedures are in place and updated annually, including a 'code of conduct' for staff and volunteers. The schools within the Trust have regard to the 'Guidance for safer working practice for those who work with children in education settings' May 2019. Information is provided to the Local Authority through the annual safeguarding return.
- There is an individual member of the governing body who will champion issues to do with safeguarding children and child protection within each school, liaise with the Designated Safeguarding Lead and provide information and reports to the governing body.
- Each school contributes to inter-agency working in line with statutory guidance 'Working Together to Safeguard Children' 2018 including providing a co-ordinated offer of Early Help for children who require this. This Early Help may be offered directly through school /Trust provision or via a referral to an external support agency.

## **14. The Trustees**

In addition to the responsibilities set out in KCSE 21, The de Ferrers Trust has charitable status and therefore implements the DfE guidance Safeguarding and protecting people for charities and trustees.

All trustees will have a clear oversight of how safeguarding and protecting people from harm is managed within the Trust.

The trustees will take all reasonable steps to protect from harm people who come into contact with the Trust.

This includes:

- children
- staff
- volunteers
- other people who come into contact with the Trust

The Trustees and senior managers are responsible for ensuring the Trust:

- has appropriate policies and procedures in place, which are followed by all trustees, staff, volunteers, supply staff and third-party contractors
- checks that people are suitable to act in their roles
- knows how to spot and handle concerns in a full and open manner
- has a clear system of referring or reporting to relevant organisations as soon as concerns are suspected or identified
- sets out risks and how they will be managed in a risk register which is regularly reviewed
- follows statutory guidance, good practice guidance and legislation
- is quick to respond to concerns and carry out appropriate investigations
- does not ignore harm or downplay failures
- has a balanced trustee board and does not let one trustee dominate its work – trustees should work together
- makes sure protecting people from harm is central to its culture
- has enough resources, including trained staff/volunteers/trustees for safeguarding and protecting people
- conducts periodic reviews of safeguarding policies, procedures and practice

The Trustees and senior managers will ensure that a Serious Incident Notification is made to the Charity Commission where required. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to our pupils, staff, volunteers or others who come into contact with through its work
- loss of our money or assets
- damage to our property
- harm to our work or reputation.

The Trust safeguarding and child protection lead will meet with the named trustee termly and provide regular reports to assist the Trustees with understanding common themes, identify risks and gaps and to consider how these are to be addressed.

Named Trustee for safeguarding is Fiona Stagg.

## **15.Escalation**

Staff need to be aware of those times when concerns may look as though they are not progressing to an outcome or some form of action.

This may be indicated by:

- Difficulty in getting hold of a DSL;
- Staff not being satisfied about the decision of the DSL or Principal;
- Staff aware that a colleague has not passed on a concern;

- External agencies not accepting a referral from a school when it is felt one is needed;
- Staff not aware of what has happened to their concern because of a lack of feedback. It is important that staff do not close down a concern because they feel “stuck” or “they can’t do anymore”. It is important to escalate concerns to DSLs, Principal’s, other senior staff or if necessary, to the Trust Safeguarding Team.

If there are concerns about the work of an external agency, please refer to the escalation policy published by the Local Safeguarding Board. The important principle is not to allow a concern to be “closed down” without it having received the necessary attention, assessment and resolution. If the options above have been explored fully and the concern still isn’t being handled effectively and therefore placing the child or young person at risk, it is important that you continue to escalate your concerns by contacting the Director of Safeguarding or the Chair of Trustees, or by contacting the NSPCC Whistleblowing Advice Line on 0800 028 0285.

## **16. Managing Allegations against Adults Working within the Trust**

The Trust takes very seriously allegations against members of staff and acknowledges that if concerns are not addressed as early as possible, they can create unsafe working environments and leave staff and children increasingly vulnerable.

The Trust has a ‘Managing Allegations against Adults Working within the Trust’ Policy, which should be followed in all cases where concerns are identified in relation to an adult working within the Trust, regarding conduct which affects/could affect pupils’ welfare or may result in a potential safeguarding issue.

Concerns about colleagues in the context of pupil welfare and safeguarding may arise in a number of ways:

- Poor attitude or practice that potentially impacts on the general well-being of children that need addressing;
- Aspects of poor practice witnessed by others;
- Staff speaking against the ethos of the school or Trust;
- Non-compliance with Trust’s policies and procedures relating to safeguarding.

More specifically, allegations may be made against an adult working within the Trust by a child or colleague in relation to abuse.

All of the above will be seen as reportable matters and discussions must take place without delay with the Principal.

However, certain allegations in relation to staff have to be reported by the Principal to the Local Authority Designated Officer (LADO), who is the statutory lead for dealing with and advising about such issues, specifically where a member of staff has:

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

Internal decisions in such cases should not be finalised without the advice of the LADO.

The LADO for Derby and Derbyshire is Miles Dent  
[miles.dent@derbyshire.gov.uk](mailto:miles.dent@derbyshire.gov.uk)  
01629 531940

The LADO for Staffordshire has a duty team contactable on:  
0800 1313126  
Emergency contact 0845 6042886

The reasons why staff may not wish to report their colleagues have to be understood. It would not be unusual for people to know and believe that practice is not acceptable but feel unable to respond because of the fear:

- They might have the concerns wrong;
- For their own job and prospects if they report another colleague;
- Of isolation by other staff;
- About what might happen to the member of staff in the long term.

It is particularly difficult if staff members are also close friends and/or partners in a relationship. It must be recognised that the child's welfare remains paramount at all times and staff must not lose sight of the impact on others of being on the receiving end of unacceptable and sometimes illegal behaviour.

Issues about attitude and poor practice may be dealt with internally and as part of the member of staff's development and competency. However, if such concerns are

persistent and any plan with that member of staff has not affected change, advice should be sought from the LADO and appropriate action taken.

Allegations against any Principal in the Trust should be directed to either of the following:

Mrs K Priestnall, Director of Safeguarding for the Trust  
[kpriestnall@deferrerstrust.com](mailto:kpriestnall@deferrerstrust.com) 01283 247776

Mrs Claire Shaw, Chair of the Trust Board  
[cshaw@deferrerstrust.com](mailto:cshaw@deferrerstrust.com)

Additionally, an individual can also address this with the Chair of the local safeguarding board or safeguarding governor for the individual school, these contact details will be on the individual safeguarding annex's which can be found on each school website and are also a linked document at the end of this policy.

Where there is a concern or an allegation against a supply teacher, the individual school will now take a lead role in the investigation working together with the supply agency.

All staff are aware of the NSPCC whistle blowing helpline should they feel concerned about the safeguarding practice in any of the Trust schools. Staff can call 0800 0280285.

## **17. Recruitment and selection of staff**

All the schools within the Trust have a safer recruitment process which follows the statutory guidance laid down in 'Keeping Children Safe in Education 2021, Part 3, Safer Recruitment'.

Each school will provide all the relevant information in references for a member of staff about whom there have been concerns about child protection/ inappropriate conduct. Cases in which the conclusion of an allegation has been unsubstantiated, unfounded, false or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference.

Each school has an open safeguarding ethos regularly addressing safeguarding responsibilities during meetings and fostering an ongoing culture of vigilance and 'it could happen here'. All new staff and volunteers receive a safeguarding induction and a copy of the code of conduct.

In line with statutory requirements, every recruitment process for school staff will have at least one member (teacher/manager/leader or governor) who has undertaken safer recruitment training.

## **APPENDIX 1**

### **PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE, OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD**

#### **Contents**

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#### **A. General**

- 1) The Derby and Derbyshire Safeguarding Children Partnership ([ddscp.org.uk](http://ddscp.org.uk)) and the Staffordshire Safeguarding Children's Board ([staffsscb.org.uk](http://staffsscb.org.uk)) contain the inter-agency processes, protocols and expectations for safeguarding children. The Designated Safeguarding Leads are expected to be familiar with these, particularly the indicators of abuse and neglect and the referral processes.
- 2) It is important that all parties act swiftly and avoid delays.
- 3) Any person may seek advice and guidance from the First Response (Starting Point in Derbyshire) Children's Duty Professionals Consultation Line, particularly if there is doubt about how to proceed. Any adult, whatever their role, can act in his/her own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.
- 4) A record, dated (including the day and time) and signed, must be made as to what has been alleged, noticed and reported, and kept securely and confidentially. All schools within the Trust have an online secure system called CPOMS and all concerns are logged on this system which then flags up to the Safeguarding Leads to act upon this information. Staff who have serious concerns about a child's

welfare should also seek the DSL or DDSL in person and talk them through their concern. The concerns remain on CPOMS and are updated by the DSL/DDSL who manages the case.

Social care referral telephone numbers for Staffordshire: 0800 1313126 and Derbyshire 01629 533190

- 5) In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents/carers and relevant parties to help to alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way, and requires assessment to see whether additional support and services are required. An example might be where it is suspected a child may be the subject of neglect. In most cases, the parents/carers knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent/carer of a referral might put the child at risk and/or undermine Police enquiries and in individual cases, advice from Children's Social Care will need to be taken.

#### **B. Individual Staff/Volunteers/Other Adults – main procedural steps**

- 1) When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine children, or promise confidentiality. Children making disclosures should be reassured and listened to and if possible at this stage should be informed what action will be taken next.
- 2) As soon as possible make a dated (including the day), timed and signed record of what has been disclosed or noticed, said or done and report to the DSL or DDSL in the school. All staff will be aware upon induction of who the DSL and DDSLs are and where they can be found.
- 3) If the concern involves the conduct of a member of staff or volunteer, a visitor, a governor, a trainee or another young person or child, the Principal must be informed.
- 4) If the allegation is about the Principal, the information should be passed to the Director of Safeguarding, the Chair of the Trustees or the Local Authority Designated Officer (LADO).

Staffordshire LADO is 0800 1313126  
Derbyshire LADO 01629 531940

- 5) If this has not already been done, inform the child (or other party who has raised the concern) what action you have taken.

#### **C. Designated Safeguarding Lead – main procedural steps**

- 1) Begin an individual case file for each child involved, which will hold a record of communications and actions to be stored securely (see Section on Records, Monitoring and Transfer). Include a chronology of case activity.

- 2) Where initial enquiries do not justify a referral to the investigating agencies, inform the initiating adult and monitor the situation. If in doubt, seek advice from the First Response professional's consultation line/ Starting Point.
- 3) Share information confidentially with those who need to know.
- 4) Where there is a child protection concern requiring immediate, same day, intervention from Children's Social Care, the First Response Children's Duty/Starting Point should be contacted by phone. Written confirmation where requested should be made within 24 hours on the online Agency Referral Form to Children's Social Care. All other referrals should be made using the online forms Derby and Derbyshire; [www.derbyshire.gov.uk/startingpoint](http://www.derbyshire.gov.uk/startingpoint) or Stoke on Trent and Staffordshire; [www.staffordshire.gov.uk/Care-for-children-and-families/childprotection/First-Response.aspx](http://www.staffordshire.gov.uk/Care-for-children-and-families/childprotection/First-Response.aspx)  
Derbyshire first response (known as Starting Point) 01629 533190  
Staffordshire first response 0800 1313126 but is in the process of changing to Staffordshire Children's Advice and Support
- 5) If it appears that urgent medical attention is required, arrange for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents/carers must be informed that the child has been taken to hospital.
- 6) Exceptional circumstances: If it is feared that the child might be at immediate risk on leaving school, take advice from the First Response/Starting Point Professionals Consultation line (for instance about difficulties if the school day has ended, or on whether to contact the police). Remain with the child until the Social Worker takes responsibility. If, in these circumstances, a parent/carer arrives to collect the child, the member of staff has no right to withhold the child, unless there are current legal restrictions in force (eg a restraining order). If there are clear signs of physical risk or threat, First Response Children's Duty should be updated and the Police should be contacted immediately.

## **APPENDIX 2**

### **PROCESS FOR DEALING WITH ALLEGATIONS AGAINST STAFF (INCLUDING THE SCHOOL PRINCIPAL) AND VOLUNTEERS**

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; 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 harm test:** A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult.

**Low-level concerns:** Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Principal. Concerns may come from various sources, for example, a suspicion, complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

**The Principal** will decide whether the concern is an allegation or a low-level concern. If it is decided it is a low-level concern that does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Relevant documents:

- DfE 'Keeping Children Safe In Education: Statutory guidance for schools and colleges' September 2021 (Part 4: Allegations of abuse made against teachers and other staff, including supply teachers and volunteers)

### 1) **Individual Staff/Volunteers/Other Adults who receive the allegation:**

Write a dated and timed note of what has been disclosed or noticed, said or done. Report immediately to the Principal.

Pass on the written record.

If the allegation concerns the conduct of the Principal, report immediately to the Director of Safeguarding, local governor for safeguarding (where appropriate), and/or Chair of Trustees. Pass on the written record. (If there is difficulty reporting to the Director of Safeguarding or Chair of Trustees, contact the Allegations Manager (LADO), as soon as possible. Derby and Derbyshire LADO Miles Dent 01629 531940 [miles.dent@derbyshire.gov.uk](mailto:miles.dent@derbyshire.gov.uk) Staffordshire LADO 0800 1313126 Out of hours 0845 6042886

### **Principal or Director of Safeguarding or Chair of Trustees**

If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.

Contact the Director of Safeguarding for the Trust, Kate Priestnall on [kpriestnall@deferrerstrust.com](mailto:kpriestnall@deferrerstrust.com) or 01283 247776 or the Chair of the Board of Trustees Claire Shaw on [cshaw@deferrerstrust.com](mailto:cshaw@deferrerstrust.com) who will advise and take next steps including notifying the LADO where appropriate.

If you are unable to contact the above notify and seek advice from the Allegations Manager (LADO), Safeguarding and Improvement Unit on the same day. Staffordshire LADO 0800 1313126 Derbyshire 01629 531940

You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.

Report to First Response/Starting Point Children's Duty if the Allegations Manager (LADO) so advises, or if circumstances require a referral concerning a child.

Ongoing involvement in cases:

- Liaison with the Allegations Manager (LADO)
- Take advice from the Trust HR Director
- Co-operation with the investigating agency's enquiries as appropriate.
- Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.
- Possible referral to the DBS or The Teaching Regulation Agency, depending on the outcome.
- 

### **APPENDIX 3**

#### **Safeguarding pupils who are vulnerable to extremism and radicalisation**

Our schools recognise the duties placed on them by the Counter Terrorism Bill (July 2015), to prevent our pupils being drawn into terrorism.

These include:

- Assessing the risk of pupils being drawn into terrorism (see Appendix 4)
- Working in partnership with relevant agencies under the Local Children's Service Board procedures
- Appropriate staff training
- Appropriate online filtering

Our schools are committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. Our pupils are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

There is a current threat from terrorism in the UK and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. All staff undergo Prevent Duty training upon commencement of their employment and this is refreshed regularly. We use the curriculum to ensure that children and young people

understand how people with extreme views share these with others, especially using the internet.

Our schools seek to protect children and young people against the messages of all violent extremism, including, but not restricted to, those linked to Islamist Ideology, Far Right / Neo Nazi / White Supremacist ideology etc. Concerns should be referred to the Single Point of Contact (SPOC) (usually a Designated Safeguarding Lead or Principal) who have local contact details for Prevent and Channel referrals. They will also consider whether circumstances require Police to be contacted.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

**APPENDIX 4 (to be completed by each school within the Trust and included on their Annex)**

**Radicalisation and Extremism Risk Assessment**

**School.....**

	Yes/No	Evidence
Does the school have a policy?		
Does the school work with outside agencies on radicalisation and extremism e.g. Channel?		
Have staff received appropriate training?		
Has the school got a trained Prevent lead?		
Do staff know who to discuss concerns with? (Single point of contact - SPOC)		
Is suitable filtering of the internet in place?		
Do children know who to talk to about their concerns?		

Are there opportunities for children to learn about radicalisation and extremism?		
Have any cases been reported?		
Are individual pupils risk assessed?		
What factors make the school community potentially vulnerable to being radicalised? (e.g. EDL local base, extreme religious views promoted locally, tensions between local communities, promotion of radical websites by some pupils/parents)		
Comment on the school's community, locality and relevant history		
Risk evaluation	<b>Low</b> <b>Medium</b> <b>High</b>	Way Forward

## **APPENDIX 5**

### **Female Genital Mutilation**

Section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 places a mandatory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18 or where a girl discloses that she has undergone FGM.

The school's response to FGM will take into account the government guidance, 'Multi-agency statutory guidance on female genital mutilation' April 2016. Staff will also follow the established safeguarding procedure by reporting any such concerns to the Designated Safeguarding Lead and a report must also be made to the Police.

There will be a considered safeguarding response towards any girl who is identified as being at risk of FGM (eg there is a known history of practising FGM in her family, community or country of origin) which may include sensitive conversations with the girl and her family, sharing information with professionals from other agencies and/or making a referral to Children's Social Care. If the risk of harm is imminent, there are a number of emergency measures that can be taken, including police protection, an FGM protection order and an Emergency Protection Order.

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons.

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

Risk factors for FGM include:

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

## **APPENDIX 6**

### **Indicators of abuse and neglect**

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

**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 from 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit

acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Indicators of abuse and neglect and SEN**

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. At The de Ferrers Trust, the safeguarding training delivered to staff reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- Special assumptions that indicators of abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Being more prone to peer group isolation than other children;
- The potential for children with SEN and disabilities being proportionally impacted by behaviours such as bullying, without outwardly showing any signs.

### **Appendix 7**

#### **List of schools within the Trust and links to their safeguarding annex**

The de Ferrers Academy	<a href="http://www.deferrers.com">www.deferrers.com</a> 01283 247750 (Dove & Trent reception) 01283 372500 (6 <sup>th</sup> Form) <a href="mailto:office@deferrers.com">office@deferrers.com</a>
Horninglow Primary School	<a href="http://www.horninglowacademy.com">www.horninglowacademy.com</a> 01283 247618 <a href="mailto:Office.horninglow@deferrers.com">Office.horninglow@deferrers.com</a>
Lansdowne Infants School	<a href="http://www.lansdowneacademy.com">www.lansdowneacademy.com</a> 01283 247920 <a href="mailto:Office.lansdowne@deferrers.com">Office.lansdowne@deferrers.com</a>
Eton Park Junior School	<a href="http://www.etonparkacademy.com">www.etonparkacademy.com</a> 01283 247910 <a href="mailto:Office.etonpark@deferrers.com">Office.etonpark@deferrers.com</a>
The Pingle Academy	<a href="http://www.pingleacademy.com">www.pingleacademy.com</a> 01283 216837 <a href="mailto:Office.pingle@deferrerstrust.com">Office.pingle@deferrerstrust.com</a>

Granville Academy

[www.granvilleacademy.co.uk](http://www.granvilleacademy.co.uk)

01283 216765

[Office.granville@deferrerstrust.com](mailto:Office.granville@deferrerstrust.com)

Richard Wakefield Primary School

[www.richardwakefieldschool.com](http://www.richardwakefieldschool.com)

01283 247535

[Office.richardwakefield@deferrerstrust.com](mailto:Office.richardwakefield@deferrerstrust.com)