



A C A D E M I E S

Child Protection Policy

Policy Owner:	S Callaghan
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POLICY REVIEW

This policy will be reviewed in full by the Trust Board on an annual basis.

Signature:

Date:

Mr A Martin
Chief Executive

Signature:

Date:

Mr R Qualye
Chair of Trust Board

1. Introduction

This document is the Safeguarding and Child Protection Policy for the Q3 Academies Trust and any extended services that it provides.

Definition of Safeguarding

Safeguarding and promoting the welfare of children is defined by the Department for Education as:

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

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect children who are suffering, or are likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse including peer-on-peer/child-on-child abuse.

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

Sharing of nudes and semi-nudes (also known as sexting and youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

Children includes everyone under the age of 18.

The following **three safeguarding partners** are identified in Keeping Children Safe in Education September 2021 and Working Together to Safeguard Children 2018 (updated December 2020) (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- ✓ The local authority (LA)
- ✓ The clinical commissioning group
- ✓ The chief officer of police

This Child Protection Policy forms one part of the Quererere Academies Trust's (QATs) safeguarding responsibilities and should be read in conjunction with the Keeping Children Safe in Education 2021 Part One and Annex B (or whatever has been decided at local level), Code of Conduct Policy, Safer Recruitment Policy, Positive Behaviour Policy, Attendance Policy, Mental Health and Wellbeing Policy, Anti-Bullying Policy and any other relevant policies as defined in the Annual Report to the QAT Board.

Purpose of a Safeguarding and Child Protection Policy	To inform all members of staff, parents/carers, volunteers and governors about the Academy's responsibilities for safeguarding children and their responsibilities therein.
Sandwell Children's Safeguarding Partnership	Each Academy follows the procedures agreed by Sandwell Safeguarding Children's Safeguarding Partnership and Sandwell Children's Trust.
Academy Staff & Volunteers	<p>Academy staff are well placed to observe the outward signs of abuse. Each Academy will therefore:</p> <ul style="list-style-type: none"> ✓ Ensure that all staff and volunteers receive safeguarding children training at least annually; all new staff will receive Induction Training. ✓ Ensure that all staff are aware of this policy and those relating to the safeguarding of children.
Mission Statement	<p>We are committed to safeguarding children and young people and we expect everyone who works in our Academies to share this commitment.</p> <p>Adults in our Academies take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.</p> <p>Ensure that children who are subject to multi-agency plans are supported by the Academy as defined in that plan.</p> <p>Students are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Students are taught to recognise when they are at risk and how to get help when they are needed.</p> <p>Contribute to children being healthy, safe, enjoying and achieving, making a positive contribution and achieving economic wellbeing.</p>
Implementation, Monitoring and Review of the Safeguarding and child protection Policy	The policy will be reviewed annually by the QAT Board and implemented by the Designated Safeguarding Leads as part of their role and responsibilities.

2. Statutory Framework

In order to safeguard and promote the welfare of children, Q3 Academies Trust will act in accordance with and follow the relevant legislation and guidance.

Working Together to Safeguard Children 2018 (updated December 2020) requires all Academies to follow the procedures for protecting children from abuse which are defined by Sandwell Children's Safeguarding Partnership and have appropriate procedures in place for responding to all concerns of actual or suspected abuse including allegations against members of staff in a position of trust.

It is essential that:

- ✓ Academies in the Q3 Trust should be aware of and follow the procedures issued by Sandwell Children's Safeguarding Partnership and Sandwell Children's Trust;
- ✓ Staff should be vigilant to signs of abuse and know that they should report any concerns to the named DSL;
- ✓ All staff should receive training to raise their awareness of signs and symptoms of suspected or actual abuse and the procedures they should follow. This will be annual with regular updates as necessary;
- ✓ Q3 Academies share information and work in partnership with other agencies when there are concerns about a child's welfare;
- ✓ All adults working full time or part time, in paid or voluntary employment (including Governors) will be subject to enhanced DBS checks;
- ✓ All staff to be made aware that Looked After Children and those on the SEN register are additionally vulnerable with regards to all safeguarding issues and how these barriers can be overcome;
- ✓ All staff must remain vigilant to students who may be at risk of grooming, child sexual exploitation, child criminal exploitation, extremism or female genital mutilation, honour-based abuse, peer-on-peer abuse and sexual violence and sexual harassment;
- ✓ All staff must also be aware that safeguarding issues may include prejudice – based bullying and homophobic/transphobic bullying.

3. The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Leads for each Q3 Academy are:

Q3 Great Barr:	Miss Sonya Callaghan; Mr Ralph Brocklebank; Mr Luke Price; Ms Anna Kudryl (Deputy)
Q3 Langley:	Ms Grace Cox; Mr Matthew Gee; Mr Chris Mills; Mr David Karim (Deputy); Mrs Katherine Fogarty (Deputy)
Q3 Tipton:	Mr Nicholas Hamilton; Mr Jon Lea (Deputy); Mr Bradley Cavell (Deputy); Ms Leigh Richards (Deputy)

In all other circumstances, report directly to the Chief Executive, Mr Andrew Martin. Other suitably trained staff are the Heads of School, the Senior Leadership Team/Group, the SENCo and all PLDs/Heads of Year.

It is the role of the Designated Safeguarding Lead(s) to:

- ✓ ensure that they attend refresher training at least every two years with an update at least on an annual basis to keep their knowledge and skills up to date;
- ✓ ensure that all staff who work with children undertake appropriate training to equip them to carry out their responsibilities for safeguarding children at least annually with regular updates which will enable them to recognise the signs and symptoms of abuse including Domestic Abuse with knowledge of what is controlling behaviours and coercive control, Child to Parent Domestic Abuse, Peer to Peer Abuse, Child Exploitation, Spiritual Abuse, Female Genital Mutilation , Honour Based Violence and Forced Marriage ;
- ✓ ensure there is effective induction in safeguarding and child protection for all adults working in the Academy, be they staff or volunteers, including supply agency staff;
- ✓ make sure that concerns are raised by staff/volunteers when necessary;
- ✓ ensure that the names and contact details of the DSL/DDSL are on display for all staff, parents, students and visitors to the Academy;
- ✓ ensure that the DSL and DDSL are not out of the Academy (e.g. at training events) at the same time;
- ✓ discuss concerns as required with outside agencies e.g. specific agency for single need (e.g. speech and language, inclusion support), early intervention multi-agency (e.g. Early Help process) or ACCESS Service/existing social worker (child protection/significant harm concerns);
- ✓ complete all necessary paperwork and correspondence including referral forms to the eCAF team or ACCESS service in regard to safeguarding and child protection referrals;
- ✓ ensure that the Academy is represented by a Designated Person for Child Protection at child protection conferences, core groups and multi-agency meetings about 'Children in Need'. It is the DSL or DDSL who should attend Child Protection Conferences rather than another representative. If this is not possible, another Designated Person should attend. If no-one can attend apologies must be given and a written report must be submitted prior to the conference;
- ✓ compile and submit a written report regarding children who are subject to child protection conferences. This should be shared with parents/carers before the conference takes place;
- ✓ ensure there is appropriate representation at Core Group meetings when a child is on a Child Protection Plan. If the most appropriate person is a member of the pastoral team, there must be joint working with the DSL/DDSL to consider appropriate safeguarding supervision arrangements;
- ✓ ensure there are appropriately trained staff to lead on and that all staff are aware of the eCAF process;
- ✓ ensure that relevant staff are informed and advised about appropriate action when a child is subject to a Child Protection Plan;
- ✓ be aware of students who have a social worker;
- ✓ help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school leadership staff;
- ✓ ensure that welfare records are kept securely and confidentially (locked and with limited access);
- ✓ ensure that safeguarding and child protection records are chronologically recorded, with significant incidents or events clearly highlighted. These records should be reviewed regularly and focus on outcomes for the child/children;
- ✓ ensure that records are transferred securely when a child changes school/Academy;

- ✓ put mechanisms in place to support the Designated Persons for Child Protection in specific regard to their welfare responsibilities e.g. weekly/monthly one to one meetings between the Safeguarding Team to offer mutual support;
- ✓ keep the Academy's Senior Leadership Group/Team, Governors, Local Authority, and SCSP informed about safeguarding and child protection issues as requested including any trends in behaviour that may affect student welfare. If necessary, training will be arranged;
- ✓ provide guidance to parents/carers, children and staff about obtaining suitable support;
- ✓ discuss with new parents/carers the role of the DSL and the role of safeguarding in the Academy. Make parents aware of the safeguarding procedures used and how to access the safeguarding and child protection policy;
- ✓ In the absence of the Designated Safeguarding Leads, the Deputy Designated Safeguarding Lead will be responsible for following the appropriate procedures. In the absence of anyone being available in the Academy, contact the Local Authority Child Protection Officers for advice – see section 14 Useful Telephone Numbers.

4. The Local Governing Body (LGB)

The Local Governing Body has overall responsibility for ensuring that there are sufficient measures in place to safeguard the children in their establishment. It is recommended that a nominated governor for child protection is appointed to take lead responsibility.

Chair - Q3 Academies Trust: Mr Robert Quayle

Vice Chair - Q3 Academies Trust: Mr Eric Payne

Chair LGB - Q3 Academy Great Barr: Mr Chris Pritchard

Chair LGB - Q3 Academy Langley: Mr Dave Pope

Chair LGB - Q3 Academy Tipton: Mr Annesley Wright

The nominated Governor for child protection is:

Q3 Great Barr: Mr David Lomax

Q3 Langley: Mr Dave Pope

Q3 Tipton: Ms Sheridan Quintyne

In particular, the QAT must ensure that:

- ✓ safeguarding and child protection policies and procedures are in place and reviewed annually;
- ✓ safer recruitment procedures are in place and reviewed annually;
- ✓ position of trust procedures are in place and reviewed annually;
- ✓ a DSL is appointed from the Senior Leadership Group/Team;
- ✓ the LA are notified of any changes in personnel to this role;
- ✓ a member of the Local Governing Body is appointed as child protection/safeguarding link governor;
- ✓ a member of the Local Governing Body (usually the Chair) is nominated to be responsible in the event of an allegation of abuse being made against the Head of School or in the case of the Chief Executive, the Chair of the QAT;

- ✓ relevant safeguarding/child protection training is accessed by all Academy staff/volunteers according to their role and responsibilities;
- ✓ students are being taught about safeguarding as part of the broad and balanced curriculum;
- ✓ that the LGBs receive an annual report from the DSL regarding safeguarding/child protection work undertaken in the year which is shared with the LA or other appropriate body;
- ✓ deficiencies or weaknesses in safeguarding arrangements are remedied without delay, liaising with relevant bodies for support as required.

5. All Staff Responsibilities

Safeguarding and child protection is **everyone's** responsibility. All Academy staff and volunteers need to be alert to the potential abuse of children both within their families and from other sources including members of the Academy community. Safeguarding incidents could happen anywhere and staff must be alert to possible concerns raised in the Academy.

All staff and volunteers should be aware that the main categories of abuse are:

- ✓ Physical abuse
- ✓ Emotional abuse
- ✓ Sexual abuse
- ✓ Neglect

All staff and volunteers should be concerned about a child if he/she presents with indicators of possible significant harm – see Appendix 1 for further information.

If any member of staff is concerned about a child the DSL/DDSL must be informed **immediately**. There is an absolute responsibility for all members of the Academy to respond to any suspected or actual abuse of a child in accordance with these procedures. **Under no circumstances should staff leave the Academy without discussing their concerns with someone.** Staff should also record the concern using 'MyConcern' safeguarding platform. The recording must be a clear, precise, factual account of the observations.

All staff who work directly with children will read and understand Part One of Keeping Children Safe in Education September 2021. Those staff who do not work directly with children will read either Part One or Annex A (a condensed version of Part One); this will be decided at local level. Regular staff training will assist and support staff to understand and discharge their role and responsibilities. Staff training will take place at least annually, with regular updates and will include the role of the DSL and Early Help.

All staff will be aware of:

- ✓ The Academy's systems which support safeguarding, including this child protection and safeguarding policy, the role and identity of the DSL and DDSL, the staff Code of Conduct policy, the Positive Behaviour policy, and the safeguarding response to children who go missing from education;
- ✓ The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- ✓ The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- ✓ What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;

- ✓ The signs of different types of abuse (emotional, physical, sexual) and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation - see Appendix 1.

6. Dealing with a Disclosure

Where a student discloses a safeguarding issue the following guidelines must be followed:

RECEIVE

- ✓ If a child wants to talk to you, never ask them to come back later. Ask them what they want to talk to you about and, if you are concerned about their welfare, give them the time to speak to you.
- ✓ Never promise confidentiality, inform the child that you are happy to talk to them but if they tell you anything that you believe may be putting them at harm that you will have to talk to someone.
- ✓ Listen carefully to the child. Do not stop a child who is freely recalling information.
- ✓ Where a child is visibly upset or has an obvious injury, it is good practice to ask a child why they are upset or how an injury was caused, or respond to a child wanting to talk to you to help clarify vague concerns and result in the right action being taken.

REACT

- ✓ Stay calm and do not show that you are shocked or upset
- ✓ If you need to clarify information, ask open-ended questions e.g. *"Is there anything you'd like to tell me?"*, *"Can you explain to me..."*, *"Can you describe to me..."*
- ✓ **Never** ask leading or suggestive questions e.g. *'Did he/she do anything that they shouldn't have done?'*
- ✓ **Never** ask 'accusing' questions e.g. *"Why didn't you tell someone earlier?"*
- ✓ **Never** criticise the alleged perpetrator, it may be someone that they will continue to live with.
- ✓ **Never** ask the student to repeat their disclosure for any other member of staff, it is your responsibility to share the information.
- ✓ These factors may compromise enquiries that need to be made later by children's social care or Police.

REASSURE

- ✓ Ensure that the child is aware that they have done the right thing in talking to you and that they have not done anything wrong.
- ✓ If you have any concerns that the child has been, or is at risk of harm, you must tell them that you will speak to someone to get help. Do not promise to keep it a secret.

RECORD

- ✓ Use 'MyConcern' to make notes as soon as possible afterwards using the words that the child has used.
- ✓ Do not record your assumptions and interpretations, just what you heard and saw.
- ✓ Do not destroy any original notes you may have made.

Do not ask a child to write an account or sign any of your documentation as this may compromise enquiries that need to be made later by children's social care or Police. The child **must not** write a statement. **REFER**

- ✓ Immediately inform the DSL, or Deputy DSL, for child protection.
- ✓ Alternatively, if appropriate, make a referral to children's social care and/or police directly – see section 7 'Making A Referral'. Inform the DSL as soon as possible that you have done so.

IF YOU DISCOVER THAT FGM HAS TAKEN PLACE OR A STUDENT IS AT RISK OF FGM

Whilst all staff should speak to the DSL/DDSL, with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **Teachers**.

If a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the Teacher **must** report this to the police. See Appendix 1 for further information.

IF YOU HAVE CONCERNS ABOUT EXTREMISM

If a child is suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL/DDSL first to agree a course of action.

If in exceptional circumstances the DSL/DDSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Group/Team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate – see section 7 'Making A Referral'.

Where there is a concern, the DSL/DDSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. Contact can also be made with the Sandwell LA Prevent Strategy Coordinator pardeep_brar@sandwell.gov.uk, justin_nixon@sandwell.gov.uk or safraz_khan@sandwell.gov.uk for further advice.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which Academy staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk **Note that this is not for use in emergency situations.**

In an emergency, call 999/112 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- ✓ think someone is in immediate danger;
- ✓ think someone may be planning to travel to join an extremist group;
- ✓ see or hear something that may be terrorist-related.

See Appendix 1 for further information on the Prevent Duty.

To consult with your DSL for child protection does not mean a referral has been made. This decision is the responsibility of the DSL for child protection who will contact the appropriate agency as and when required.

If you are unhappy about the response you receive from your DSL for child protection contact the Local Authority Designated Officer for Education on 0121 569 4770 or, in their absence, contact the child's relevant children's social services where you will be able to speak to a qualified social worker – see section 14 Useful Telephone Numbers for contact details.

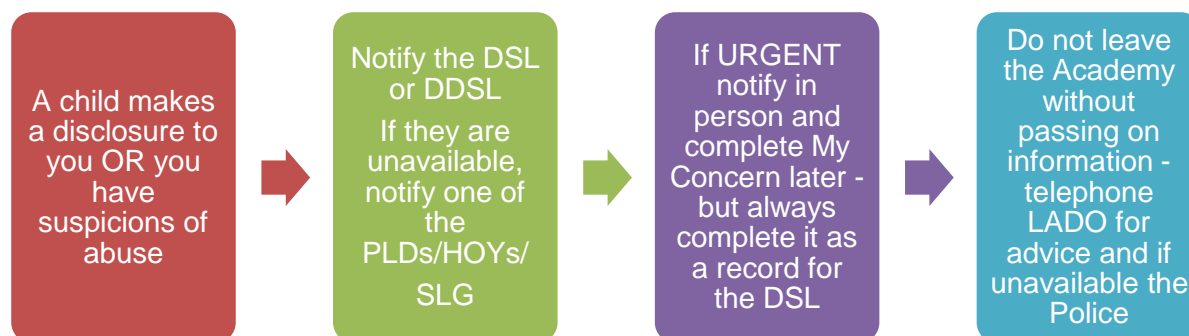
The **NSPCC Whistleblowing helpline** is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0808 800 5000 – line is available from 8:00 AM to 10:00 PM, Monday to Friday, 9:00 AM to 6:00PM at the weekend or e-mail: help@nspcc.org.uk.

All staff may raise concerns directly with Children's Social Care Services.

Remember - under no circumstances should you leave the Academy without discussing your concerns with someone.

7. Making a Referral

What to do if you are worried a child is suffering or likely to suffer from harm, or is in immediate danger



A referral involves sharing information in line with the SCSP, Multi Agency Threshold Document to either the Early Help Assessment Team, with the consent of the parents/carers, children's social care (MASH) or the Police in matters of immediate risk.

Parents/carers should be informed if a referral is being made except in the circumstances outlined in communication with parents [– see section 9](#).

However, inability to inform parents for any reason should not prevent a referral being made to children's social care via the Access Service. It would then become a joint decision with Children's Services about how and when the parents/carers should be approached and by whom.

If low level multi agency support is required for a child and/or their family, the DSL for child protection will, with consent of the parent/carer, refer to the Early Help Assessment Team to enable a team around the family plan to be initiated. This will be targeted multi-agency support to help the family resolve any identified concerns.

If the concerns are more complex and require statutory intervention then the DSL will refer the matter to children's social care via the Access service where a decision will be made whether any enquiries are needed under Section 17 (child in need enquiry) or Section 47 (child protection enquiry) of the Children Act 1989. A flowchart can be found at Appendix 6 detailing the referral procedure.

As safeguarding incidents and/or behaviours can be associated with factors outside the Academy and/or can occur between children outside the Academy, the DSL should consider the context within which such incidents and/or behaviours occur. This is known as 'Assessment of risk outside the family home', which simply means assessments of children should consider whether wider environmental factors that are present in a child's life are a threat to their safety and/or welfare. By providing this information to children's social care, as part of the referral process, assessments can then consider all the available evidence and the full context of any abuse.

How to make a referral:

Check the student's postcode on [GOV.UK](#) and contact the authority applicable to where they live.

For a student who lives in Sandwell:

Step 1 – call the Access service (0121 569 3100) and advise that a referral is being made. Be prepared to give as much of the following information as possible using the SAFER guidelines - see Appendix 4.

Step 2 - Submit all supporting evidence within one hour of the verbal referral using the **Early Help Assessment Form** for referrals to the Early Help Assessment team or the **Multi Agency Referral Form (MARF)** for referrals to children's social care (MASH).

Accurately record the action agreed following the referral, or that no further action is to be taken, and the reasons for this decision noting with whom discussions were held and who made the decisions – use ‘My Concern’ to record.

Birmingham Children’s Social Care

0121 303 1888 (out of hours - 0121 675 4806)

https://www.birminghamchildrenstrust.co.uk/info/6/contact_us/38/worried_about_a_child

Walsall Children’s Social Care

0300 555 2866 (out of hours - 0300 555 2922)

<http://childrens-services.webwalsall.com/services/concerned-about-a-child-or-young-person/>

Wolverhampton Children’s Social Care

01902 555392 (out of hours – 01902 552999)

<https://www.wolverhamptonsafeguarding.org.uk/concerned-about-a-child-or-adult>

NSPCC Helpline

0800 800 5000

8. Confidentiality and Information Sharing

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

- ✓ All staff, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly children’s social care and the Police.
- ✓ Staff/volunteers who receive information about children and their families in the course of their work should share that information within the expectations of the relevant policies e.g. Child Protection policy, Data Protection policy including GDPR.
- ✓ Timely information sharing is essential to effective safeguarding.
- ✓ Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- ✓ The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- ✓ If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- ✓ Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests. If a child wishes to confide in a member of staff/volunteer and requests that the information is kept secret, the member of staff/volunteer will tell the child, in an appropriate manner to the individual needs of the child, that they cannot promise confidentiality and may need to pass the information on to help keep the child or other children safe.
- ✓ The government’s Information Sharing advice for safeguarding practitioners includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information.

- ✓ If staff are in any doubt about sharing information, they should speak to the DSL (or deputy DSL).
- ✓ Confidentiality is also addressed in this policy with respect to record-keeping in section 10, and allegations of abuse against staff in section 12.

Whenever a child transfers to another Academy or college, the DSL should ensure that their safeguarding/child protection files will be sent to the receiving school/college/Academy in a secure manner and relevant agencies will be informed of the new school/college that the child has moved to. Confirmation of receipt should be obtained from the new school/college. This should be transferred separately from the main student file. Receiving schools and colleges should ensure key staff such as the DSL and SENCo (or the named person with oversight for SEN in a college), are aware as required.

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

9. Communication with Parents

The Academy will always discuss concerns with parents/carers unless to do so would:

- ✓ place the child at risk of significant harm or further risk of significant harm.
- ✓ place a vulnerable adult at risk of harm.
- ✓ compromise any enquiries that need to be undertaken by children's social care or the police.

Q3 Academy will endeavour to ensure that parents have an understanding of the responsibilities placed on the Academy and staff for safeguarding children.

10. Record Keeping

When a child has made a disclosure, the member of staff/volunteer should:

- ✓ record any concerns, discussions, decisions made and the reasons for those decisions on 'MyConcern'.
- ✓ not destroy any original notes made in case they are needed by a court; these should be uploaded to MyConcern.
- ✓ record statements and observations rather than interpretations or assumptions.
- ✓ distinguish fact from opinion.

All records need to be uploaded to 'MyConcern' before the end of the working day.

Access to confidential student files on 'MyConcern' is secure; only the DSL and DDSL can access the system. Relevant members of the safeguarding team can access students within their designated year group.

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

Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained in line with GDPR and stored securely until the child reaches the age of 25 years.

If a child for whom the Academy has, or has had, safeguarding concerns moves to another school/Academy, the DSL will ensure that their child protection file is forwarded promptly and securely as stated in section 8.

In addition, the Safer Recruitment Policy sets out our procedure on record-keeping specifically with respect to recruitment and pre-employment checks and section 11 of this policy sets out our policy on record-keeping with respect to allegations of abuse made against staff.

11. Safer Recruitment

The Academy adopts recruitment procedures that help deter, reject or identify people who might abuse children.

There are written recruitment and selection policies and procedures in place. This includes the practice of at least one of the persons who conducts an interview has completed safer recruitment training.

See the Safer Recruitment Policy for further details. This makes reference to the updated 'Keeping children safe in education - for schools and colleges' to reflect legal changes following EU exit, including guidance on checking the past conduct of individuals who have lived or worked overseas

12. Allegations or Concerns about an adult working in the Academy whether as a teacher, supply teacher, other staff, volunteers or contractors

At Q3 Academy we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Head of School without delay; any concerns about the Head of School should go to the Chair of Governors / Trust.

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 guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the Academy that provides education for children under 18 years of age, including supply teachers and volunteers has:

- ✓ behaved in a way that has harmed 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 (consideration for any transferable risk e.g. incidents at home, in the community).

In these circumstances, the allegation should be taken seriously and the Head of School, who has the responsibility for managing allegations against persons in a position of trust, should be informed immediately.

It is not the responsibility of the person receiving the allegation to make any enquiries or discuss the allegation with any one other than the Head of School.

As with all other concerns about the welfare of children, the member of staff receiving the allegation should make a written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Head of School.

Under no circumstances should the informant be asked to make a written record of the allegation or asked to sign any documentation. This is the responsibility of the person receiving the allegation. However, staff can take verbatim notes as a direct record of the child's disclosure.

The Head of School has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern 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).

Low-level Concerns

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- ✓ being over friendly with children;
- ✓ having favourites;
- ✓ taking photographs of children on their mobile phone;
- ✓ engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- ✓ using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the Head of School should collect as much evidence as possible by speaking:

- ✓ directly to the person who raised the concern, unless it has been raised anonymously;
- ✓ to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Low-level concerns should be recorded in writing, including:

- ✓ name* of individual sharing their concerns
- ✓ details of the concern
- ✓ context in which the concern arose
- ✓ action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. It is recommended that it is kept at least until the individual leaves their employment.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO.

Before contacting the LADO, the Head of School will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the Academy, or a combination of these.

Appropriate support will be put in place for the member of staff who is facing the allegation and a named contact within the Academy will be provided.

If the Head of School is implicated in the concerns, the Chief Executive and Chair of Governors should be informed immediately. In the absence of the Chief Executive and the Chair of Governors the Vice Chair should be informed immediately.

Allegations against a Teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

To reduce the risks of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the Academy Staff Handbook, Academy Code of Conduct policy or Government document 'Guidance for safer working practice for those working with children and young people in an education setting'.

DEFINITIONS FOR OUTCOMES OF ALLEGATION INVESTIGATIONS

Substantiated: there is sufficient evidence to prove the allegation.

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

False: there is sufficient evidence to disprove the allegation.

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

TIMESCALES

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within one week.

If the nature of an allegation does not require formal disciplinary action, the Academy will institute appropriate action within three working days.

If a disciplinary hearing is required and can be held without further investigation, the Academy will hold this within fifteen working days.

Supporting Those Involved

The Academy recognises its duty of care to employees. The Academy will do its utmost to manage and minimise the stress inherent in the allegations process. Support will be provided to the individual about whom the allegations have been made and will be advised to contact their trade union representative. The individual should, as soon as possible, be given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The employee will be given access to counselling or the Academy's occupational health team should this be required.

An Academy representative will be appointed to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. For suspended employees, the Academy will take steps to ensure that the employee is kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents/carers of a student(s) involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents/carers. Parents/carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents/carers

of the child should be told the outcome in confidence (giving consideration to appropriate Data Protection legislation).

Parents/carers should also be made aware of the requirement to maintain confidentiality about any allegations made against Teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraphs 206-207). If parents/carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

Confidentiality

The Academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a Teacher who has been accused by, or on behalf of, a student from the same Academy (where that identification would identify the Teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State (carried out by the Teaching Regulation Agency) or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the Teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public". This means that a parent/carer who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the Teacher by members of the public).

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted).

The Head of School/Governing Body will take advice from the local authority's designated officer(s), police and children's social care services to agree the following:

- ✓ who needs to know and, importantly, exactly what information can be shared;
- ✓ how to manage speculation, leaks and gossip;
- ✓ what, if any information can be reasonably given to the wider community to reduce speculation; and
- ✓ how to manage press interest if, and when, it should arise.

Managing the Situation, Exit Arrangements, Resignations and 'Settlement Agreements'

If the accused person resigns, or ceases to provide their services, this shall not prevent an allegation being followed up in accordance with Keeping Children Safe in Education September 2021 statutory guidance. A referral to the DBS must be made, if the criteria are met. The Academy will also consider whether a referral to the Secretary of State is appropriate. The Academy has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of

that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals shall be made as soon as possible after the resignation or removal of the individual.

If the accused person resigns or their services cease to be used and the criteria are met it will not be appropriate to reach a settlement/compromise agreement. A settlement/compromise agreement which prevents the Academy from making a DBS referral when the criteria are met would likely result in a criminal offence being committed as the Academy would not be complying with its legal duty to make the referral.

The Academy will endeavour to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgment about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. Where it is difficult to reach a conclusion in those circumstances, and it is not possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, the Academy will wherever possible try to reach and record a conclusion.

'Settlement agreements' shall not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Record Keeping

Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer (Information Commissioner guidance on employment records will be adhered to).

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the Academy staff handbook, Academy Code of Conduct or Government document 'Guidance for Safer Working Practice for those working with Children and Young People in Education' 2019 and Addendum April 2020.

If you have safeguarding or child protection concerns relating to the parents/carers of children and you are aware that they work with children, young people or vulnerable adults, you must inform the DSL for child protection. This will allow for consideration to be given as to whether the position of trust process needs to be applied.

References

When providing employer references, the Academy will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious. Any request for an employer's reference should be provided by the Chief Executive, Head of School and/or HR.

Learning Lessons

At the conclusion of any case, especially where the allegations are *substantiated*, the Academy will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements to be made to the Academy's procedures or practice to help prevent similar events in the future.

13. Statutory Academy Policies

A full list of statutory policies can be found at the DfE Website.

14. Other Recommended Safe Environment Policies

Anti-bullying	PSHE curriculum (Sex and Relationship Education)
Drugs and substance misuse	Race, Disability and Equality Policy
E-Safety (including Acceptable Use Policies and Use of Digital Images)	Recruitment and Selection
First aid (including management of medical conditions, intimate care)	Positive Behaviour (including Physical Intervention)
Management of allegations against staff	Whistle blowing
Academy Code of Conduct	Data Protection and Freedom of information

15. Useful Telephone Numbers

Sandwell LADO (Local Authority Designated Officer) 0121 569 4770

Police (immediate danger) 101 or 999

Sandwell Local Authority Child Protection Officers for Education 0121 569 8144

Prevent (Extremism) Coordinator 0121 569 2322

Children's Social Care

Sandwell 0121 569 3100 (available out of hours)

Birmingham 0121 303 1888 (out of hours - 0121 675 4806)

Walsall 0300 555 2866 (out of hours - 0300 555 2922)

Wolverhampton 01902 555392 (out of hours – 01902 552999)

NSPCC Whistleblowing helpline 0808 800 5000

N.B. Check the students postcode on GOV.UK and ring the authority applicable to where they live.

Appendix 1: Specific forms of abuse and safeguarding issues

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

Abuse

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

Physical Abuse

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

Signs of possible physical abuse

- ✓ Any injuries not consistent with the explanation given for them
- ✓ Injuries which occur to the body in places which are not normally exposed to falls or rough games
- ✓ Injuries which have not received medical attention
- ✓ Reluctance to change for, or participate in, games or swimming
- ✓ Bruises, bites, burns and fractures, for example, which do not have an accidental explanation
- ✓ The child gives inconsistent accounts for the cause of injuries
- ✓ Frozen watchfulness

Possible effects of physical abuse

Physical abuse can lead directly to neurological damage, physical injuries, disability and in extreme cases death. Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural problems and learning difficulties.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Signs of possible emotional abuse

- ✓ Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy

- ✓ Obsessions or phobias
- ✓ Sudden underachievement or lack of concentration
- ✓ Seeking adult attention and not mixing well with other children
- ✓ Sleep or speech disorders
- ✓ Negative statements about self
- ✓ Highly aggressive or cruel to others
- ✓ Extreme shyness or passivity
- ✓ Running away, stealing and lying

Possible effects of emotional abuse

If a child suffers sustained emotional abuse, there is increasing evidence of adverse long-term effects on their development. Emotional abuse has a significant impact on a developing child's mental health, behaviour and self-esteem. It can be especially damaging in infancy and can be as important as the other more visible forms of abuse, in terms of its impact on the child. Domestic violence and abuse (DVA), adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse.

Sexual Abuse

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/or 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 and **all** staff should be aware of it and the policy and procedures for dealing with it, (see Appendix 1 – Peer on peer abuse).

Signs of possible sexual abuse

- ✓ Any allegations made by a child concerning sexual abuse
- ✓ The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age
- ✓ Sexual activity through words, play or drawing
- ✓ Repeated urinary infections or unexplained stomach pains
- ✓ The child is sexually provocative or seductive with adults
- ✓ Inappropriate bed-sharing arrangements at home
- ✓ Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- ✓ Eating disorders such as anorexia or bulimia.

Possible effects of sexual abuse

Disturbed behaviour including self-harm, inappropriate sexual behaviour, sadness, depression and loss of self-esteem have all been linked to sexual abuse. Its adverse effects may last long into adult life. The severity of the impact on the child is believed to increase the longer the abuse continues, the more serious the abuse, the younger the child at the start, and the closeness of the relationship to the abuser. The child's ability to cope with the experience of sexual abuse, once recognised, can be strengthened by the support of a non-abusive adult carer who believes the child, helps the child understand the abuse, and is able to offer help and protection. Some adults who sexually abuse children were themselves sexually abused as children.

Neglect

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

Signs of possible neglect

- ✓ Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- ✓ Clothing that is dirty, too big or small, or inappropriate for weather conditions
- ✓ Frequently left unsupervised or alone
- ✓ Frequent diarrhoea
- ✓ Frequent tiredness
- ✓ Untreated illnesses, infected cuts or physical complaints which the carer does not respond to
- ✓ Frequently hungry
- ✓ Overeating junk food

Possible effects of neglect

Neglect can seriously impair a child's health, physical and intellectual growth and development, and can cause long term difficulties with social functioning, relationships and educational progress. Extreme cases of neglect can cause death.

Q3 Academy train staff annually on identifying and reporting all suspected types of abuse and neglect. Staff are expected to read and adhere to our safeguarding guidance.

Absence

Q3 Academy will robustly monitor the attendance of children on roll in line with the Attendance Policy. When a safeguarding/child protection concern is raised, attendance concerns will be shared with partner agencies in accordance with local information sharing protocols.

The Academy will hold more than one emergency contact number for each student. Emergency contact numbers should be provided and updated by the parent/carers with whom the student normally resides. This goes beyond the legal requirement but is good practice. Doing so provides the Academy with additional options for making contact with a responsible adult when a child is missing from the Academy and is also identified as a welfare and/or safeguarding concern.

Alternative Provision settings

Where a student is placed with an alternative provision provider, Q3 Academy will obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. This will be monitored and reviewed during visits to the alternative provision setting.

Children Missing Education

Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Knowing where children are during school hours is an extremely important aspect of Safeguarding. A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM, or forced marriage.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when students are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the Academy as soon as possible if the numbers change.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- ✓ Are at risk of harm or neglect;
- ✓ Are at risk of forced marriage or FGM;
- ✓ Come from Gypsy, Roma, or Traveller families;
- ✓ Come from the families of service personnel;
- ✓ Go missing or run away from home or care;
- ✓ Are supervised by the youth justice system;
- ✓ Cease to attend the Academy;
- ✓ Come from new migrant families.

In response to the guidance in Keeping Children Safe in Education (2021) the Academy has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take students off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards); or
 - e. are permanently excluded

We will ensure that students who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

If a member of staff suspects that a child is suffering from harm or neglect, they should follow the Academy's child protection procedures. If necessary we will make an immediate referral to the local authority children's social care team, and the police.

Child Sexual Exploitation (including Grooming) and Child Criminal Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse which involves children and young people (male and female) who are under the age of eighteen and subjected to exploitive relationships, violence, coercion and intimidation. This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Perpetrators of child sexual exploitation are found in all parts of the country and are not restricted to particular ethnic groups. Child sexual exploitation can also occur through the use of technology without the child's immediate recognition. Exploitative relationships are characterised in the main by the child or young person's availability of choice resulting from their social/economic and/or emotional vulnerability and can have serious long term impact on every aspect of their life, health and education.

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

Q3 Academies Trust recognises the well evidenced links between CSE and children who go missing; agencies must work together to reduce incidents of missing, to locate the child and to learn from the child's experiences. Agencies have a joint responsibility to prevent children from becoming victims of CSE and to protect them and safeguard them from further risk of harm.

Messages about healthy relationships and risky behaviour are taught through the PSHE programme in each academy. A wider range of topics relevant to the age and experiences of students is also be covered such as:

- ✓ respect and responsibilities;
- ✓ awareness of unhealthy relationships, sexual exploitation and grooming;
- ✓ understanding of dangerous and exploitative situations;
- ✓ exploring gender stereotypes and gender roles;
- ✓ increasing awareness of risk, assessing risk and the consequences of risk taking, including sexual bullying and peer pressure;
- ✓ building skills and confidence in developing positive, healthy relationships.

All children and young people are at risk of online sexual exploitation. Each Academy will ensure that online safety procedures are robust and that students are taught online safety skills so they know:

- ✓ online risks;
- ✓ how to recognise unsafe online contact;

- ✓ to be confident to report any concerns about themselves or others to staff that taking an explicit photograph of themselves, sending/receiving such an image or requesting one from a friend is a criminal act.

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

Indicators of child sexual exploitation may include:

- ✓ Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- ✓ Gang-association and/or isolation from peers/social networks;
- ✓ Exclusion or unexplained absences from school, college or work;
- ✓ Leaving home/care without explanation and persistently going missing or returning late;
- ✓ Excessive receipt of texts/phone calls;
- ✓ Returning home under the influence of drugs/alcohol;
- ✓ Inappropriate sexualised behaviour for age/sexually transmitted infections;
- ✓ Evidence of/suspicious of physical or sexual assault;
- ✓ Relationships with controlling or significantly older individuals or groups;
- ✓ Multiple callers (unknown adults or peers);
- ✓ Frequenting areas known for sex work;
- ✓ Concerning use of internet or other social media;
- ✓ Increasing secretiveness around behaviours; and
- ✓ Self-harm or significant changes in emotional well-being.

Some of the following can be indicators of CCE:

- ✓ children who appear with unexplained gifts or new possessions;
- ✓ children who associate with other young people involved in exploitation;
- ✓ children who suffer from changes in emotional well-being;
- ✓ children who misuse drugs and alcohol;
- ✓ children who go missing for periods of time or regularly come home late; and
- ✓ children who regularly miss school or education or do not take part in education.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- ✓ Having a prior experience of neglect, physical and/or sexual abuse;
- ✓ Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);

- ✓ Recent bereavement or loss;
- ✓ Social isolation or social difficulties;
- ✓ Absence of a safe environment to explore sexuality;
- ✓ Economic vulnerability;
- ✓ Homelessness or insecure accommodation status;
- ✓ Connections with other children and young people who are being sexually exploited;
- ✓ Family members or other connections involved in adult sex work;
- ✓ Having a physical or learning disability;
- ✓ Being in care (particularly those in residential care and those with interrupted care histories); and
- ✓ Sexual identity.

More information can be found in *Child sexual exploitation: Definition and a guide for practitioners* (DfE 2017)

Child Criminal Exploitation: 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 or other form of “deal line”.

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

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

See KCSIE (2021) page 126.

Children with a social worker

At Q3 Academy, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most students.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support students who have a social worker.

For example the Academy will support students with a social worker by monitoring their attendance, meeting regularly with the student, having regular contact with the social worker and any other agencies involved with the case, attend relevant meetings.

The Virtual Headteacher has responsibility to promote the education of children who have a social worker; the Academy will support in this process.

Assessment of risk outside the family home (formerly Contextual Safeguarding)

Safeguarding incidents and/or behaviours can be associated with factors outside the Academy and/or can occur between children outside the Academy. All staff, but especially the DSL, should consider the context within which such incidents and/or behaviours occur. This is known as ‘Assessment of risk outside the family

home', which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. By providing this information, to children's social care, as part of the referral process, assessments can then consider all the available evidence and the full context of any abuse. Additional information is available here: [Contextual Safeguarding](#)

Domestic Abuse

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

Definition

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

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 sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Sandwell Childrens Safeguarding Partnership (SCSP) operate Operation Encompass which is a police and education early intervention safeguarding partnership that supports children and young people exposed to Domestic Abuse (including controlling behaviour and coercive control). It aims to ensure schools are notified in a timely manner of any Domestic Abuse incident where child/ren are present or registered at the address. This early notification should mean that, in the majority of cases, schools are alerted, via Movelt , in readiness for the children arriving at Academy the first working day following an incident and as close as possible to the start of the Academy day that the child has been or may have been exposed to a domestic abuse incident. This knowledge, given to the Academy's trained Key Adult, usually the DSL, allows the provision of immediate early intervention through overt or silent support, dependent upon the needs and wishes of the child.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC: UK Domestic Abuse - signs, symptom, effects](#)

[Safelives - young people and domestic abuse](#)

See KCSIE (2021) page 130.

Homelessness

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

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

If staff are concerned that a child/family is at risk of homelessness or has become homeless, inform the DSL and record it on MyConcern. The DSL will then refer the family to support services, or if needed complete a MARF.

Honour Based Abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 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 of integration into UK society
- ✓ mother or a sister who has undergone FGM
- ✓ girls who are withdrawn from PSHE
- ✓ visiting female elder from the country of origin
- ✓ being taken on a long holiday to the country of origin
- ✓ talk about a 'special' procedure to become a woman

Symptoms of FGM - FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- ✓ difficulty walking, sitting or standing and may even look uncomfortable.
- ✓ spending longer than normal in the bathroom or toilet due to difficulties urinating.
- ✓ spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- ✓ frequent urinary, menstrual or stomach problems.

- ✓ prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.
- ✓ reluctance to undergo normal medical examinations.
- ✓ confiding in a professional without being explicit about the problem due to embarrassment or fear.
- ✓ talking about pain or discomfort between her legs.

The Serious Crime Act 2015 introduced mandatory reporting of FGM, which from 31st October 2015 requires to report any known or seen cases to Police via the 101 telephone number. Therefore, any suspicion of FGM must be reported immediately.

Staff must personally report to the Police and disclose that FGM has been carried out in addition to liaising with the DSL. **This is a statutory duty**, and staff will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

The duty for Teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students. Any member of staff who suspects a student is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL

The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#)

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

- ✓ Speak to the student about the concerns in a secure and private place;
- ✓ Activate the local safeguarding procedures and refer the case to the local authority's designated officer;
- ✓ Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fcdo.gov.uk
- ✓ Refer the student to an education welfare officer, pastoral tutor, learning mentor, or Academy counsellor, as appropriate.

Host families

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

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

Mental Health

All staff at Q3 Academies are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Academy staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy via MyConcern or in person if it is of an urgent nature.

See the Mental Health & Wellbeing Policy for further information.

Peer on Peer Abuse including Sexual Violence and Sexual Harassment

Q3 Academy staff recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. We will be a zero-tolerance approach to abuse.

Q3 Academy recognises the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer on peer abuse is unacceptable and will be taken seriously.

All staff are made aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- ✓ bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- ✓ abuse in intimate personal relationships between peers;
- ✓ physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include online element which facilitates, threatens and/or encourages physical abuse);
- ✓ sexual violence and sexual harassment;
- ✓ upskirting which typically involves a picture under a person’s clothing without their permission;
- ✓ sharing nudes and semi-nudes (previously known as sexting or youth produced sexual imagery) and
- ✓ initiation/hazing type violence and rituals.

Even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.

Sexual violence and sexual harassment

Context

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical

and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Victims should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim be ever made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

All staff are made aware of the importance of:

- ✓ making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- ✓ not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- ✓ challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Sexual Violence

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

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

- ✓ sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- ✓ sexual “jokes” or taunting;
- ✓ physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual

violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature, and;

- ✓ online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Initial response

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the normal safeguarding reporting process – see section 6 and 7.

Further information and guidance can be found here: [Sexual violence and sexual harassment between children in schools and colleges](#)

Most cases of students hurting other students will be dealt with under the Academy's behaviour policy, but this child protection policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- ✓ Is serious, and potentially a criminal offence;
- ✓ Could put students in the Academy at risk;
- ✓ Is violent;
- ✓ Involves students being forced to use drugs or alcohol;
- ✓ Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting).

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

- ✓ The member of staff must record the allegation and tell the DSL, but do not investigate it;
- ✓ The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- ✓ The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed;
- ✓ The DSL will contact the children and adolescent mental health services (CAMHS) and any other relevant support agencies, if appropriate.

The Academy will minimise the risk of peer-on-peer abuse by:

- ✓ Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- ✓ Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys;
- ✓ Ensuring our curriculum helps to educate students about appropriate behaviour and consent;

- ✓ Ensuring students know they can talk to staff confidentially by promotion in assemblies and tutor time and by use of the Academy screens;
- ✓ Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

Staff are made aware of the Academy's policy and procedures with regards to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it..

Preventing Radicalisation (Prevent Duty June 2015)

From 1st July 2015 schools became subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent Duty.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

Q3 Academy will assess the risk of students being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

Q3 Academy ensures that students are safe from terrorist and extremist material when accessing the internet within the Academy. The Academy uses Web and Email filtering appliances as well as Screen Monitoring software to identify any potential risks or safeguarding issues which are checked on a regular basis.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff should be alert to changes in students' behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

- ✓ Refusal to engage with, or becoming abusive to, peers who are different from themselves;
- ✓ Becoming susceptible to conspiracy theories and feelings of persecution;
- ✓ Changes in friendship groups and appearance;
- ✓ Rejecting activities they used to enjoy;
- ✓ Converting to a new religion;
- ✓ Isolating themselves from family and friends;
- ✓ Talking as if from a scripted speech;
- ✓ An unwillingness or inability to discuss their views;

- ✓ A sudden disrespectful attitude towards others;
- ✓ Increased levels of anger;
- ✓ Increased secretiveness, especially around internet use;
- ✓ Expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- ✓ Accessing extremist material online, including on Facebook or Twitter;
- ✓ Possessing extremist literature;
- ✓ Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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

If staff are concerned about a student, they will follow our procedures set out in section 7 (Making A Referral) of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

The [Educate Against Hate](#) website, which is the collaboration between the Department for Education, the Home Office, the NSPCC, Internet Matters, Childnet, ParentZone, UK Internet Safety Centre and many other organisations, brings together the best advice, support and resources available for parents/carers and Academy Staff who want to learn how to protect young people from extremism and radicalisation. The information and advice available on Educate Against Hate is an invaluable resource and we encourage all parents to visit the site and familiarise themselves with the information it provides.

We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the Academy'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.

Q3 Academies Trust also adheres to the principles and promotes anti-oppressive practice inline with the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

Private Fostering

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

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

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

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

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there

is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

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

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

Sharing nudes and semi-nudes Staff responsibilities when responding to an incident:

If you are made aware of an incident involving the sharing of nudes and semi-nudes (also known as sexting and 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- ✓ View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it – **this is illegal**. If you have already viewed the imagery by accident, (e.g. a student has showed it to you before you could ask them not to), you must report this to the DSL or equivalent and seek support;
- ✓ Delete the imagery or ask the student to delete it;
- ✓ Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the responsibility of the DSL or equivalent);
- ✓ Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers;
- ✓ Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL or equivalent.

Initial review meeting:

Following a report of an incident, the DSL will hold an initial review meeting with appropriate Academy staff. This meeting will consider the initial evidence and aim to determine:

- ✓ Whether there is an immediate risk to student(s);
- ✓ If a referral needs to be made to the police and/or children's social care;
- ✓ If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed);
- ✓ What further information is required to decide on the best response;
- ✓ Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown);
- ✓ Whether immediate action should be taken to delete or remove images from devices or online services;
- ✓ Any relevant facts about the students involved which would influence risk assessment;
- ✓ If there is a need to contact another school, college or individual;

- ✓ Whether to contact parents/carers of the students involved (in most cases parents/carers should be involved).

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

- ✓ The incident involves an adult;
- ✓ There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- ✓ What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- ✓ The imagery involves sexual acts and any student in the imagery is under 13;
- ✓ The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Head of School and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL:

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

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

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

Informing parents:

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

Referring to the police:

If it is necessary to refer an incident to the police, this will be done through contacting the Sandwell Young Person's Police Officer, local neighbourhood police office or dialling 101.

Recording incidents:

All sharing nudes and semi-nudes incidents and the decisions made in responding to are recorded on 'My Concern'.

Curriculum:

Students are taught about the issues surrounding sexting as part of our PSHE programme. Teaching covers the following in relation to sexting:

- ✓ What it is;
- ✓ How it is most likely to be encountered;
- ✓ The consequences of requesting, forwarding or providing such images, including when it is and is not abusive;
- ✓ Issues of legality;
- ✓ The risk of damage to people's feelings and reputation;

- ✓ Students also learn the strategies and skills needed to manage;
- ✓ Specific requests or pressure to provide (or forward) such images;
- ✓ The receipt of such images.

This policy on sexting is also shared with students so they are aware of the processes the Academy will follow in the event of an incident.

Further information can be found here: [UKCIS Guidance: Sharing nudes and semi-nudes.](#)

Special Educational Needs and Disabilities (SEND) or Health Conditions

Evidence available in the UK on the extent of abuse among children with Special Educational Needs or disabilities (SEND) or certain health conditions suggests that they are at increased risk of abuse, and that the presence of multiple SEN or disabilities appears to increase the risk of both abuse and neglect. Children with SEN or disability or a certain health condition may be especially vulnerable to abuse for a number of reasons.

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

- ✓ Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- ✓ Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- ✓ The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- ✓ Communication barriers and difficulties in managing or reporting these challenges.

Where there are concerns about the welfare of an SEN or child with disabilities, they should be acted upon in accordance with these procedures in the same way as with any other child. The same thresholds or action and the same timescales apply. Please see the Q3 Academies policy website for SEND policy.

Visitors

All visitors to the Academy must be vetted especially if they are presenting to students. Content will need to be checked beforehand to ensure that it is suitable and age appropriate.

If the visitor is working directly with students, safeguarding procedures must be adhered to. Visitors to the Academy need to be supervised unless they have sufficient clearances in accordance with our HR and safeguarding processes.

If visitors are booked to work with students consideration needs to be given as to how often the visitor will be attending the Academy. Less than three visits in thirty days will require supervision; more than three times in a thirty day period will require appropriate checks by HR.

All visitors are required to sign in at Reception, read our safeguarding notice and be met by the relevant staff member. Visitors will either wear an orange lanyard and be escorted by a member of staff or wear a green lanyard which indicates that appropriate DBS and checks are in place.

Q3 Academy Great Barr staff and Q3 Academy Tipton staff wear blue lanyards; Q3 Academy Langleigh staff wear purple lanyards.

Work Experience

When organising work experience, the Academy ensures that policies and procedures are in place to protect children from harm.

Placements are arranged through Work Experience Support Services who provide off site learning placements which have been checked in terms of health, safety and safeguarding.

See page 123 of Keeping Children Safe in Education September 2021 for additional advice and support.

Appendix 2: Suicide Prevention

See the Mental Health and Wellbeing Policy for further information on Suicide.

Suicide Risk Factors for consideration Please remember that risk factors give an indication of the potential for harm to occur - they do not provide a 100% accurate prediction of what will happen.

It may help to think of risk factors as 'alarm bells' - the more 'alarm bells' that are ringing, the greater the concern. However, it may only take one risk factor to trigger a young person having suicidal thoughts or behaviours.

Guidance:

Personal history

- ✓ Previous self-harm, suicidal thoughts or suicide attempt;
- ✓ Substance use – used as a possible self-harming behaviour or generating a deterioration in mood that may prompt an attempt;
- ✓ Evidence of mental health problems; especially depression, psychosis, post-traumatic stress disorder or eating disorder;
- ✓ Dual-diagnosis; history of mental health and substance misuse;
- ✓ History of abuse, whether physical, emotional or sexual - but especially the latter;
- ✓ Loss or bereavement - this may include such things as loss of relationships or social status as well as deaths. Anniversaries of losses can be significant;
- ✓ Breakup of relationship (boyfriend/girlfriend/family);
- ✓ Bullying or other victimisation; such as experiencing racial or sexual discrimination, and including homophobic bullying (see below);
- ✓ Current stressors or life events (e.g. not coping at school or college);
- ✓ Family factors – instability (divorce, separation, changes of care giver, repeated house moves etc.), conflict, arguments and domestic violence and abuse;
- ✓ Family history of suicide or mental illness, especially in first-degree relatives. History of adult substance misuse;
- ✓ Gender or sexual orientation – many young people who are homosexual, or are uncertain about their sexuality may self-harm or attempt suicide.

Personal functioning

- ✓ Changes such as; anxiety levels, problem solving skills, social withdrawal, feelings of hopelessness, personal appearance, sleeping and eating habits.
- ✓ Altered mental states; agitation, hearing voices, delusional thinking, aggression, intoxication.
- ✓ Statements of intent; such as letters, comments, Facebook status, text messages etc.
- ✓ Poor communication skills and difficulties in concentrating.
- ✓ Tendency of impulsive behaviour.
- ✓ Running away from home.
- ✓ Anger/hostility/anti-social behaviour.
- ✓ Drug and alcohol misuse.

- ✓ Young people may display ambivalence about their future; e.g. no reason for living, no purpose in life.

Verbal warning signs

- ✓ 'I'm going to top myself'.
- ✓ 'I can't take it any more'.
- ✓ 'Nobody cares about me'.
- ✓ 'I can't see the point anymore'.
- ✓ 'Everyone would be better off if I weren't here' 'Nothing matters anymore'.

External Factors

- ✓ Time of year may be significant; especially when school-related factors are involved, such as bullying or exams. Hence the start of terms or exam periods may see an increase in suicidal thoughts.
- ✓ Some people are impacted on by Seasonal Affective Disorder (SAD).
- ✓ Social economic disadvantage/unemployment.
- ✓ Homelessness.
- ✓ Disaster.
- ✓ The death of other young people (particularly by suicide).
- ✓ Discrimination.

Levels of risk and suggested action:

	Risks	Sandwell Suggested Action	Q3 Academy Procedure
Low Risk	<ul style="list-style-type: none"> • Suicidal thoughts are fleeting and soon dismissed • No plan • Few or no signs of depression • No signs or psychosis (delusional thoughts and behaviours) • No self-harming behaviour • Current situation felt to be painful but bearable 	<ul style="list-style-type: none"> • Ease distress as far as possible. Consider what may be done to resolve difficulties • Link to other sources of support • Make use of line management or supervision to discuss particular cases and concerns • Review and reassess at agreed intervals • Consider completing an Early Help Assessment (EHA) – refer to Threshold Document 	<ul style="list-style-type: none"> • Refer to Inclusion Welfare Team • Assign a Key Worker • Complete an EHA • Review at weekly Strategic Safeguarding Meeting • Complete a risk assessment
Raised Risk	<ul style="list-style-type: none"> • Suicidal thoughts are frequent but still fleeting • No specific plan or immediate intent • Evidence of current mental disorder, especially depression or psychosis • Significant drug or alcohol use • Situation felt to be painful, but no immediate crisis 	<ul style="list-style-type: none"> • Ease distress as far as possible. Consider what may be done to resolve difficulties • Consider safety of young person, including possible discussion with parents/carers or other significant figures • Seek specialist advice • Possible mental health assessment – discussion with, for example primary care mental health worker, Child and 	<ul style="list-style-type: none"> • Assign Key Worker • Liaise regularly with Parents/Carers • Refer to CAMHs/CP for additional advice • Review at weekly Strategic Safeguarding Meeting • Complete a risk assessment

	<ul style="list-style-type: none"> • Previous, especially recent, suicide attempt • Current self-harm 	<p>Adolescent Mental Health Service (CAMHS) or G.P.</p> <ul style="list-style-type: none"> • Consider consent issues for the above • Consider increasing levels of support/professional input • Review and reassess at agreed intervals – likely to be quicker than if risk is low 	
High Risk	<ul style="list-style-type: none"> • Frequent suicidal thoughts, which are not easily dismissed • Specific plans with access to potentially lethal means • Evidence of current mental illness • Significant drug or alcohol use • Situation felt to be causing unbearable pain or distress • Increasing self-harm, either frequency, potential lethality or both 	<ul style="list-style-type: none"> • Ease distress as far as possible. Consider what may be done to resolve difficulties • Safety – discussion with parents/carers or other significant trusted figures in the child's life. Consider avenues of support available for those involved. • CAMHS referral • Consider consent issues • Consider increasing levels of support/professional input in the meantime • Monitor in light of level of CAMHS involvement 	<ul style="list-style-type: none"> • Assign Key Worker • Refer to CAMHS • Multiagency support/involvement determined via Academy Safeguarding Team to ensure support for whole family/friendship groups • Complete a risk assessment

Guidance for Staff
Do
Take suicide gestures seriously
Create rapport with young person and ensure they feel able to talk with you
Make assessment of risk
Be yourself, listen, be non-judgmental, patient, and think about what you say
Check associated problems such as bullying, substance use, bereavement, relationship difficulties, abuse, and sexuality issues
Check how and when parents will be contacted
Encourage social connection to friends, family, trusted adults
Ensure support/contact with young person is in place
Seek risk assessment from GP.
Make appropriate referrals
Set up a meeting to plan the care pathway interventions based on understanding of risks and difficulties
Provide opportunities for support, strengthen existing support systems - consider protective factors
Make sure you record your assessment, concerns and actions in line with the Academy's procedures

Don't
Do not be scared of asking direct questions such as "Are you having thoughts of killing or harming yourself?"
Do not promise absolute confidentiality
Do not make assumptions or react without considering all of the risks
Do not dismiss what the child or young person is saying
Do not complete the suicide risk assessment – refer to the DSL/DDSL
Do not presume that a young person who has threatened to harm themselves in the past will not carry it out in the future
Do not disempower the child or young person
Do not ignore or dismiss people who self-harm
Do not view self-harm or suicidal thoughts as attention seeking or used to manipulate the system or individuals
Do not jump to assumptions – be aware of your own views and stereotypes and how they influence your approach to suicide and self-harm

Appendix 3: Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

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

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying; and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

The Academy has appropriate filters and monitoring systems in place. Sophos Webfilter is used to filter the internet for all staff and students. There is also Sophos AV on all Academy machines. Keyword monitoring is conducted through Impero which is a monitoring software package.

There is a clear policy on the use of mobile technology in the Academy that does not allow students to use their mobile phone on site during Academy hours. Staff are allowed to bring their personal phones to the Academy for their own use, but should limit such use to non-contact time when students are not present. Staff members' personal phones should remain out of sight during contact time with students. Staff are not permitted to take pictures or recordings of students on their personal phones or cameras. Academy phones and cameras are available for staff for trips and sporting fixtures. The Academy follows the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the Academy.

Education

Online safety training for staff is integrated into the staff induction process as well as throughout the academic year for all staff when new updates need to be shared.

The Academy teaches and regularly promotes safeguarding issues, including online safety, through a number of ways:

PSHE programme - delivers information sharing and discussions including the following topics; sex education, knives, gang culture, cultural diversity and acceptance, e-safety, child sexual exploitation, neglect, keeping safe, radicalisation.

SMSC in Tutor Time - the SMSC programme is delivered during Tutor Time and allows mixed age groups to discuss key and current issues in relation to safeguarding.

Assemblies are delivered once a week; there is a weekly theme attached to each assembly. On a number of occasions, the local police will deliver assemblies to students on topics such as knife crime and social media.

Resources that the Academy use to support learning include:

UKCCIS has recently published its Education for a Connected World Framework. The framework aims to support the development of the curriculum and is of particular relevance to PSHE Education and Computing:

- ✓ The PSHE Association provides guidance on developing a PSHE curriculum – <https://www.pshe-association.org.uk/>

Information and support

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

Organisation/Resource	What it does/provides
thinkuknow	NCA CEOPs advice on online safety
disrespectnobody	Home Office advice on healthy relationships, including sexting and pornography
UK safer internet centre	Contains a specialist helpline for UK schools and colleges
swgfl	Includes a template for setting out online safety policies
internet matters	Help for parents on how to keep their children safe online
parentzone	Help for parents on how to keep their children safe online
childnet cyberbullying	Guidance for schools on cyberbullying
pshe association	Guidance and useful teaching resources covering online safety issues including pornography and the sharing of sexual images
educateagainsthate	Practical advice for parents, teachers and governors on protecting children from extremism and radicalisation.
the use of social media for online radicalisation	A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
UKCCIS	The UK Council for Child Internet Safety's website provides: <ul style="list-style-type: none"> • Sexting advice • Online safety: Questions for Governing Bodies • Education for a connected world framework
NSPCC	NSPCC advice for schools and colleges
net-aware	NSPCC advice for parents
commonsensemedia	Independent reviews, age ratings, & other information about all types of media for children and their parents
searching screening and confiscation	Guidance to schools on searching children in schools and confiscating items such as mobile phones
lgfl	Advice and resources from the London Grid for Learning

Appendix 4: SAFER

Aide-memoire for professionals to support efficient and appropriate telephone referrals of children who may be suffering, or are likely to suffer, significant harm

Situation

- ✓ I am (give your name/designation/base). I am calling about (child's name(s)/date of birth / address, or mother's details if an unborn child).
- ✓ I am calling because I believe this child is at risk of harm.
- ✓ The parents are/aren't aware of the referral.

Assessment and actions

- ✓ I have assessed the child and the specific concerns are (provide specific factual evidence).
- ✓ Or: I fear for the child's safety because (provide specific facts – what you have seen, heard and/or been told).
- ✓ An Early Help Assessment has/hasn't been completed/followed prior to this referral.
- ✓ The child is now (describe current condition and whereabouts).
- ✓ I have not been able to assess the child but I am concerned because.
- ✓ I have (actions taken to make the child safe).

Family factors

- ✓ Specific family factors making this child at risk of significant harm are (base on the Assessment of Need Framework i.e. parenting capacity, family/environment, child's developmental needs).
- ✓ Additional factors creating vulnerability are ...
- ✓ Although not enough to make this child safe now, the strengths in the family situation are.

Expected response

In line with [Keeping Children Safe in Education September 2021](#) and Working Together to Safeguard Children 2018 (updated December 2020) and Section 17 and/or Section 47 of the Children Act it is recommended that a specialist social care assessment may need to be undertaken.

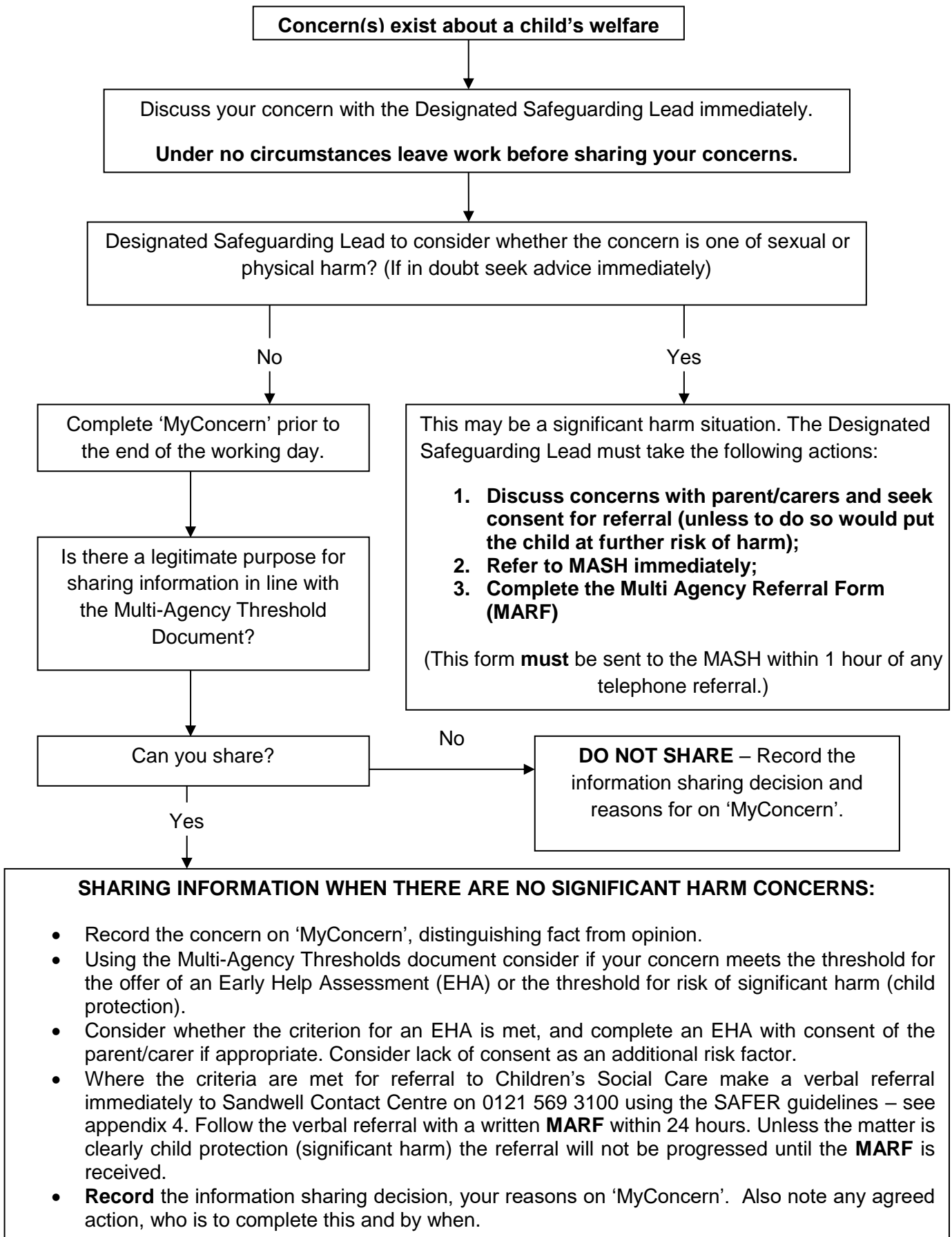
- ✓ Other recommendations.
- ✓ Ask: Do you need me to do anything now?

Referral and recording

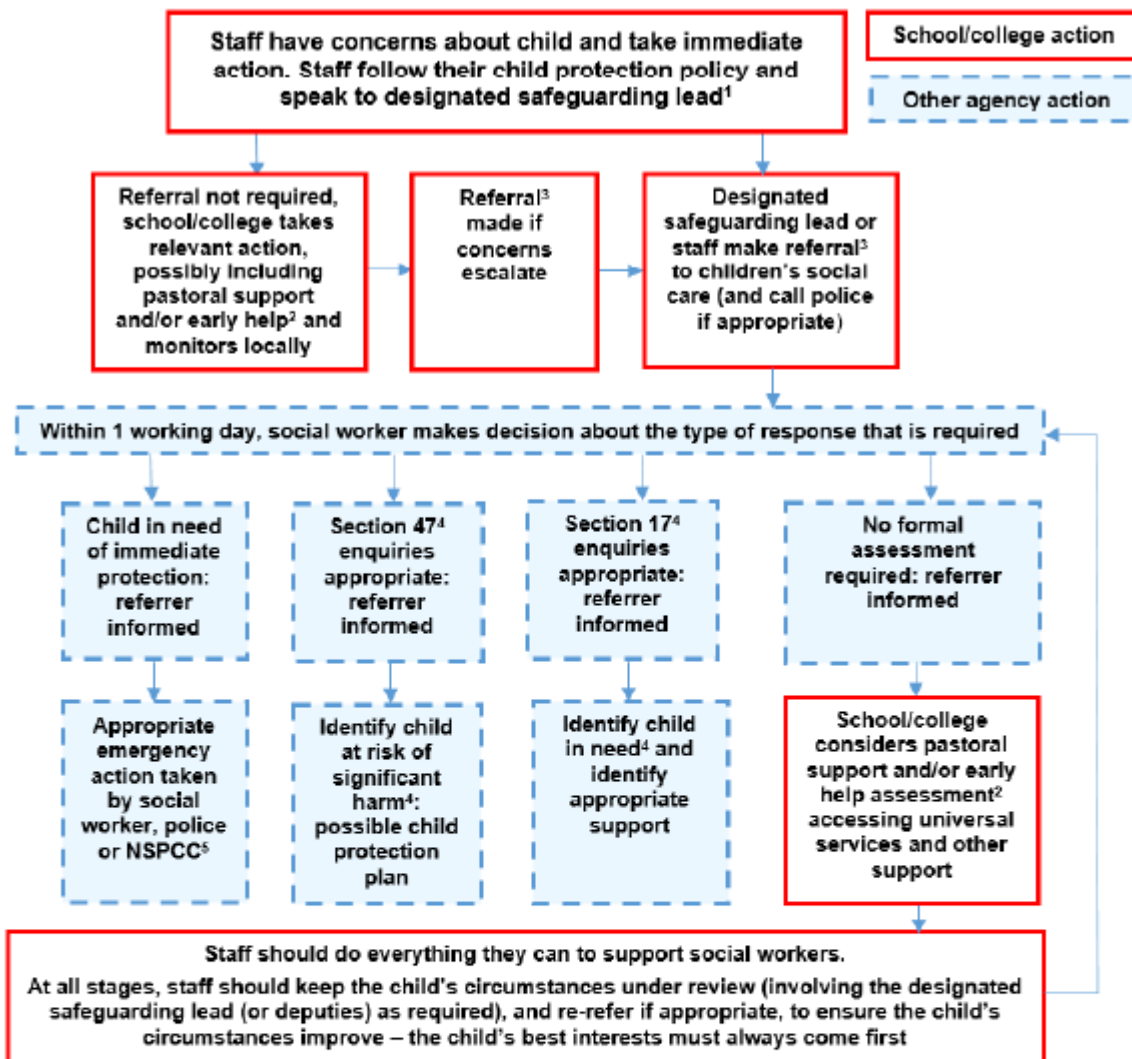
- ✓ I will follow up with a written referral (MARF) and would appreciate it if you would get back to me as soon as you have decided your course of action.
- ✓ Exchange names and contact details with the person taking the referral.
- ✓ Now complete the MARF ensuring that it is sent within one hour and record details and time and outcomes of telephone referra

Appendix 5: Procedural Flowchart

Safeguarding and Promoting Children's Welfare Procedural Flowchart



Appendix 6: Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).