



# **SAFEGUARDING POLICY**

## CHANGE CONTROL

<i>Date</i>	<i>Issue</i>	<i>Details of change</i>
February 2017	1.0	Accepted & approved under Chairs Action
November 2018	1.a	Adopted Staffordshire Safeguarding Children's Board Policy
December 2018	2.0	Issue Updated following approval through '7-day process'
November 2019	3.0	Issue Updated following approval through '7-day process'
November 2020	4.0	Issue Updated following approval through '7-day process'
November 2021	4.a	Issue Updated
November 2021	5.0	Updated following agreement at Board Meeting 08.12.2021
November 2022	5.a	Issue Updated
November 2022	6.0	Approval at Board Meeting 07.12.2022
November 2023	6.a	Issue Updated
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November 2024	7.a	Issue Updated
November 2024	8.0	Approval at Board Meeting on 11.12.2024
Autumn 2025	8.a	Issue Updated
Autumn 2025	9.0	Approval at Board Meeting

<b>Next Review</b>	Autumn 2026
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## AUTHORISATION

Approved at the Board Meeting on 10<sup>th</sup> December 2025

Signed:



10.12.2025

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**Chair of the Board**

**Date**

# **Safeguarding Policy Incorporating Child Protection**

## **Insight MAT**

Whilst this policy pertains to all employees and, as appropriate, Governors, Trustees, Members, contractors, visitors and volunteers connected with Insight Multi-Academy Trust, Local Academy Committees (LACs) of individual academies have been delegated responsibility to specify local arrangements for the operation of this policy within their academy. These are detailed within page 5, 13, pages 24-25 and Appendix 9 of this policy.

Section	Title	Page No
1	Introduction & Aims	6
2	Ethos and culture	7
3	Legislation, guidance & links to other policies	8
4	The role of all staff in keeping children safe	9
5	The role & responsibilities of the DSL/DDSL	10
6	Our Local Academy Committee	11
7	Working with Parents/Carers	14
8	Staffordshire Early Help	15
9	What happens if a referral is deemed necessary to escalate beyond early help	15
10	Escalation Process	16
11	A safer school culture	16
12	Keeping children safe in Education (2025)-Specific safeguarding issues	18
13	Children potentially at greater risk of harm	19
14	Educational Visitors to School	19
15	Allegations made against/concerns raised in relation to teachers, other staff, volunteers, and contractors	20
16	Information sharing	22
17	Managing complaints	22
18	Site Security	23
19	Safeguarding Information sheet for new supply staff and regular visitors or volunteers	25
<b>Appendices</b>		
Appendix 1	Definitions and Indicators of Abuse	27
Appendix 2	Specific safeguarding issues	30
Appendix 3	Allegations about a Member of Staff, Governor or Volunteer	43
Appendix 4	Indicators of Vulnerability to Radicalisation	44
Appendix 5	SPOC contacts	46
Appendix 6	Role of the Staffordshire LADO	47
Appendix 7	Child on Child Abuse	49
Appendix 8	Allegations of abuse made against staff	58
Appendix 9	Safeguarding arrangements which are specific to Sir Graham Balfour School	66
Appendix 10	Useful links and contacts	68

## **Key Safeguarding Contacts for Sir Graham Balfour School**

<b>Role in school</b>	<b>Name</b>	<b>Date and Level of Safeguarding training</b>
Headteacher	Matthew Mason	Level 1 September 2025
Designated Safeguarding Lead (DSL)	Sharon Metcalfe	Level 3 February 2024
Deputy Designated Safeguarding Lead (DDSL)	Rachel Norman Sarah Marshall Dave Chamberlain (SENDSCO)	Level 3 November 2024 Level 2 December 2024 Level 3 May 2023
Nominated Governor for Safeguarding	Mike Winkle	Level 1 September 2025
Chair of Governors	Mike Winkle	Level 1 September 2025
Designated teacher for Looked After Children	Sharon Metcalfe	Level 3 February 2024
Mental Health Lead	Sharon Metcalfe	Level 3 February 2024

## 1. Introduction & Aims

The purpose of the Safeguarding policy of schools within the Insight MAT is to ensure that we:

- **Are committed** to developing a robust safeguarding culture of vigilance and challenge.
- **Build resilience** by raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe.
- **Establish a safe environment** in which children can learn and develop within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- **Support vulnerable children** who have been abused, have witnessed violence towards others or may be vulnerable to abuse.
- **Prevent unsuitable people** from working with children by ensuring we practise safe recruitment in checking the suitability of **all** school staff, supply staff and volunteers to work with our children and maintain an active, ongoing vigilance in line with the safeguarding culture.

**Our aim** is to follow the procedures set out by Staffordshire Safeguarding Children's Board, [Working Together to Safeguard Children 2023](#) and Keeping Children Safe in Education 2025 by **knowing** and **understanding** that:

- Safeguarding and promoting the welfare of children is **everyone's** responsibility and the **voice of the child** is evident.
- **Everyone** who comes into contact with children and their families has a role to play.
- **Everyone** should ensure that their approach is **child-centred** considering, at all times, what is in the **best interests** of the child.
- By establishing a safe environment, we enable children to learn and develop within an ethos of openness.
- **No single practitioner** can have the full picture of a child's needs and circumstances.
- If children and families are to receive the **right help at the right time**, **everyone** who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.
- The importance of providing children with a balanced curriculum including PHSE, healthy relationship education, online safety, sexting, child-on-child abuse as well as 'abuse outside the home' (County Lines, Child Criminal Exploitation incl Child Sexual Exploitation and other contextualised safeguarding issues). Also supporting this with online activities, enabling children to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Undertaking the role to enable children and young people at each school in the Trust to have the **best outcomes**.
- Ensuring that we have awareness of staff's knowledge and understanding, as well as embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a **robust element** of each school's practice.

In all schools within Insight MAT we strive to: -

- Provide help and support to meet the needs of children as soon as problems emerge
- **Protect** children from maltreatment, inside or outside the home, including online.
- **Prevent** impairment of our children's mental and physical health or development.
- **Ensure** that our children grow up in circumstances consistent with the provisions of safe and effective care.
- **Take action** to enable **ALL** children to have the best outcomes.

This policy provides guidance to **all** adults working within the school, whether paid or voluntary or directly employed by the school or a third party and should be read in conjunction with the documents [Keeping Children Safe in Education 2025](#) and [Working Together to Safeguard Children 2023](#).

- This policy is available on the school website and is available on request from the school office. We will also inform parents/carers about this policy when their children join any school within the Trust.
- This policy will be reviewed in full by the Trust Board and LAC on an annual basis or sooner should legislation/guidance change.
- This policy sets out how each school's discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are students at this school. Our policy applies to **all** staff; paid and unpaid, working in the school, including Governors.
- The policy is provided to **all** staff (including temporary staff, supply staff and volunteers) at the point of induction, alongside the Staff code of conduct policy.
- In each school in the Trust our LAC, working with the senior leadership team and especially our Designated Safeguarding Lead (DSL), ensure that those staff who do not work directly with children will read at least Part 1 or Annex A (condensed version of Part 1) of the KCSiE 2022 guidance.
- All staff who work directly with children, are provided with, and have read at least Part One of Keeping Children Safe in Education 2025
- The school follows the Staffordshire Safeguarding Children's Partnership policies and procedures. [Staffs SCB](#)

## **2. The ethos and culture within the Insight MAT**

Within the Insight MAT, children's welfare is of paramount importance. Children are reassured that they have a voice, will be listened to and what they say will be taken seriously. They know that they will be supported and kept safe. They will never be given the impression that they are creating a problem by reporting abuse. Our safeguarding training makes it clear that if a child makes a disclosure to a particular member of staff, they have chosen that member of staff for a reason. It is explained to staff how to listen to the student, be empathetic and if needed get cover rather than pass the child onto someone else who the child may not be open with.

Children are encouraged to talk freely with staff if they are worried or concerned about something and staff understand that a victim of any type of abuse should never feel ashamed for making a report. Their views and wishes will inform any assessment and provision for them.

We make every effort to listen to and capture the voice of children to enable us to have a clear understanding of their daily lived experiences. This includes understanding that the child's presenting behaviours and observations by staff also form part of the child's voice; staff will record these on My Concern.

We are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated or being threatened. This could be due to vulnerability, disability and/or sexual orientation or language barriers. This does not prevent ALL staff from having professional curiosity and speaking to the DSL if they have concerns about a child and staff determine how best to build trusted relationships with children which facilitate this communication.

We understand our statutory duty to safeguard and promote the welfare of children and we maintain a professional attitude of **'it could happen here', 'it has happened here' and 'it will happen again'** where safeguarding is concerned. We expect **ALL** staff, trustees, governors, volunteers, and visitors to share our commitment, maintaining a safe environment and a culture of vigilance.

Everyone has a responsibility to **act without delay** to protect children by reporting anything that might suggest a child is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours, that

underpins this commitment. We work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

We have a culture of vigilance and staff are confident and competent in the timely challenge of unacceptable behaviours and these are dealt with appropriately and robustly. Staff do not accept these behaviours as 'banter' 'having a laugh' or 'part of growing up'. This culture is shared with students as part of our PSHE/RSE programme.

**All** staff are encouraged to report any concerns that they have and not to see these as insignificant. On occasions, a referral is justified by a single incident, such as an injury or disclosure of abuse. However, concerns can accumulate over time and are evidenced by building a picture of harm, particularly true in cases of abuse or neglect.

We know that it is crucial that staff record and pass on any concerns in a timely manner and in accordance with this policy, to allow the DSL/DDSL to build up a picture and access support at the earliest opportunity.

When dealing with safeguarding matters, we are conscious of the language and terminology that we use, especially in front of children. Sometimes reference is made to a child who has been subjected to abuse as a victim. However, not all children will consider themselves a victim nor will they want to be referred to in this way. We are conscious of this and when managing any incident, we will be prepared to use terminology that children are most comfortable with.

In KCSiE 2025 guidance, reference is made to alleged perpetrator and perpetrator, however we will try to avoid using these terms and instead we will refer to children and young people who have 'displayed' or 'instigated' particular behaviours. We will ensure that **all** children involved receive support.

We work closely with safeguarding partners and share the same goals, learn with and from each other, have what we need to help families, acknowledge and appreciate difference as well as challenging each other.

We acknowledge the four principles that as professionals we should follow when working with parents and carers:

- effective partnership and the importance of building strong, positive, trusting and co-operative relationships
- respectful, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents and carers
- empowering parents and carers to participate in decision making by equipping them with information, keeping them updated and directing them to further resources
- involving parents and carers in the design of processes and services that affect them.

We recognise the stressful and traumatic nature of safeguarding and child protection work and support staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate. The DSL/DDSL has half termly supervision to help support the stressful nature of their roles.

[Education Support helpline - free and confidential emotional support for teachers and education staff](#)

### **3. Legislation, guidance and links to other policies**

This policy has been devised with due regard for the statutory guidance from the DfE ([Keeping Children Safe in Education 2025](#) KCSiE) and this document is read alongside;

- [Working Together to Safeguard Children 2023](#)
- [Staffordshire Safeguarding Children Partnership Procedures](#)
- [What to do if you are Worried a Child is being Abused-Advice for Practitioners](#)
- [Behaviour in Schools - Advice for headteachers and school staff](#)



- The Insight MAT recommends that schools use The Key as a source of advice and guidance.
- Other school policies and procedures which link to this policy are: Achievement and Positive Behaviour Policy, Anti-Bullying,, Staff Code of Conduct, Staff Recruitment Policy, Online Safety and Whistleblowing Policy. All these policies can be found on our website.

#### **4. The role of all staff in keeping children safe**

**All** staff have read and have a good understanding of **at least part 1 of Keeping Children Safe in Education 2025** and are aware of the safeguarding link to other policies relating to their daily practice.

**All** staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see para 142 for further information and Filtering and Monitoring Standards) . This training takes place at induction and is regularly updated.) at induction and this training is regularly updated. We have a planned programme that includes whole staff Level 1 Safeguarding, 7 minute briefings which are included in staff bulletin, at the beginning of each Personal Development and Welfare meeting we include a session on safeguarding including AI-generated sex abuse material, the Hackett tool etc. In addition, **all** staff should receive safeguarding and child protection (including online safety) updates as required, and at least annually, to continue to provide staff with relevant skills and knowledge to safeguard children effectively.

**All** staff know who the DSL/DDSL is, and as well as being the expert in this field, are there to support staff, volunteers, and LAC.

**All** staff are aware of their responsibility to provide a safe environment in which children can learn.

**All** staff are aware of indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Including contextualised safeguarding. Staff are confident in exercising **professional curiosity** and understand that knowing what to look for is vital for the early identification of abuse and neglect to identify cases of children who may be in need of our help or protection. They are aware that abuse, neglect, and exploitation, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**All** staff, but especially the DSL/DDSL consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

**All** staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks online as well as face to face. They know that in many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. This includes AI-generated child sex abuse material.

Guidance

#### **AI Guidance**

**All** staff are also mindful that disinformation, misinformation and conspiracy theories can be an online safety risk/concern.

**All** staff know what to do if a child tells them they are being abused, exploited, or neglected. Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be involved, such as the DSL/DDSL and local authority children's social care. Staff never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. They are aware of their statutory reporting responsibilities and duty in relation to FGM.

**All** staff know how to reassure children that they are being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting **any** form of abuse and/or neglect. Nor should a child ever be made to feel ashamed for making a report.

**All** staff are aware of the early help process and understand their role in it and are confident to identify and support children who may benefit from early help, effectively giving children and their families the right help at the right time.

**All** staff are aware of how to make a referral to children's social care, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with their potential role in such assessments.

**All** staff understand their responsibility to report concerns about the behaviour of any adult in our setting and know that they will be listened to and taken seriously.

**All** staff understand their responsibility to escalate concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm. This means escalating internally if outcomes are not improving for children or externally using the [SSCB Escalation Policy](#) or [Whistleblowing Advice Line | NSPCC](#)

In all cases, if staff are unsure, they know that they should always speak to the DSL/DDSL.

## **5. Roles and responsibilities of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead(s)(DDSL)**

For full details of the DSL/DDSL roles and responsibilities please refer to Part 2 & Annex C of Keeping Children Safe in Education 2025

The DSL/DDSL(s) have received the appropriate safeguarding training to provide them with an understanding of their role and the knowledge and skills to carry it out. The DDSL(s) are trained to the same level as the DSL. Training received also supports their knowledge of the processes, procedures, and responsibilities of other agencies, particularly children's social care in line with [Working Together to Safeguard Children 2018](#). This training is updated at least every 2 years and in addition to this they regularly (at least annually) refresh and update their knowledge and skills. The DSL is given **additional** time, funding, training, resources, and support needed to carry out the role effectively. The DSL uses weekly briefings from ESAS, networking with other DSLs, reading guidance and results from the annual Section 175 audit to ensure they keep up-to-date.

The DSL takes the **lead responsibility** for safeguarding and child protection (including online safety as well as an understanding of the expectations, applicable roles and responsibilities in relation to the filtering and monitoring systems and processes in place, including requirements relating to the safe use and filtering of generative AI), and this is explicit in their job description.

Guidance

[Filtering and monitoring standards for schools and colleges](#)

[Generative AI expectations](#)

[Plan technology for your setting](#)

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Safeguarding Policy

Issue: v9.0

During term time, the DSL/DDSL is available (during school hours) for staff in the school to discuss any safeguarding concerns. The DSL can delegate activities to the DDSL(s); however, the ultimate responsibility remains with them, and this lead responsibility is not delegated. In the absence of the DSL the DDSL(s) will take a lead on safeguarding with clear direction from the Leadership Group. The DSL is available via email during out of hours and the DDSL works whole year to cover during school holidays.

The DSL acts as a source of support, advice, and expertise for staff. Risk assessments/safety plans will be completed as required and should, where appropriate, involve other agencies, these are reviewed regularly and shared appropriately.

The DSL maintains robust systems to monitor and record training of **all** staff and update and refresher time scales are evident within the training record. Training is delivered in-line with Staffs SCB and KCSIE 2025. This will include bulletins, briefings, and INSET day training as well as external events attended.

The DSL ensures that **all** staff and regular visitors have appropriate safeguarding training to equip them for their role in school. This includes training on how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information accurately. The DSL ensures systems in place to induct new staff/governors etc are robust and monitored and any non-compliance shared with Leadership Group/LAC

The DSL monitors the safeguarding management systems. The Insight MAT prefers My Concern but recognises partner schools may use other systems to record concerns about children, ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storing of information are kept in-line with the [Data Protection Act 2018](#) and General Data Protection. The safeguarding and child protection records are kept in a secure location, away from academic records and there is a clear recording process of transfer, in or out, which if paper file transfer, using the transfer of records form which is signed by the sending and receiving settings and a copy of this form kept by both.

When a parent chooses to remove their child/ren from school to receive EHE (Elective Home Education), the DSL will pass on any safeguarding concerns and the safeguarding file if there is one, to the EHE Team within Staffordshire (or other) County Council and inform other professionals who may be involved with that child.

The DSL/DDSL monitors the quality of safeguarding files through auditing case files regularly. Appropriate and regular supervision takes place with the DSL and may be extended to other members of staff if we deem this appropriate.

The DSL/DDSL will refer cases of suspected abuse to the local authority children's social care, as required, and support other staff to make these referrals. We understand the importance of attending case conferences and core group meetings as well as Child in Need meetings.

The DSL will liaise with all staff (e.g., pastoral staff, attendance officers, school nurses, SEN staff and Mental Health Leads) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

The DSL/DDSL will represent school at child protection conferences and core group meetings and will be the expert within each setting to support staff in liaising with other agencies, making assessments and any referrals. Any staff member may be required to be part of strategy discussions with other interagency meetings and contribute to the assessment of child/ren. The DSL/DDSL will notify children's social care if a child with a child protection plan is absent for more than two days without explanation. The DSL must complete the education report prior to the Conference.

The DSL/DDSL helps to promote educational outcomes by sharing appropriate information about the welfare, safeguarding and child protection issues that children (including children with or who have previously had a Social Worker) are experiencing, or have experienced, with teachers and school leadership staff. Their role could include

ensuring that the schools and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for these children; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make.

The DSL has a good understanding of the community the school serves, the risks and its resilience.

## **6. The Local Academy Committee (LAC)**

Within the Insight MAT's individual schools, the LAC has a strategic leadership responsibility for safeguarding arrangements, and they **must** ensure that they comply with our duties under legislation. They **must** have regard to this guidance in ensuring policies, procedures and training are effective and comply with the law at all times. See Part 2 Keeping Children Safe in Education 2025. The Headteacher ensures that the policies and procedures, adopted by the LACs and proprietors (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff. These policies are transparent, clear, and easy to understand staff, children and their parents/carers.

The LAC ensure that **all** governors and trustees receive appropriate safeguarding (including online which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This training should be regularly updated and in line with any advice from the safeguarding partners) training at induction. This will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding and this training is regularly updated. All MAT Trust Board members and members of individual schools' LACs should be on the register for training annually.

In considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, our LAC will ensure that our school has appropriate filters and monitoring systems in place. They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The LAC will review the following standards and discuss with IT staff and service providers what more needs to be done to support our setting in meeting this standard:

- identify and assign roles and responsibilities to manage filtering and monitoring systems;
- review filtering and monitoring provision at least annually;
- block harmful and inappropriate content without unreasonably impacting teaching and learning;
- have effective monitoring strategies in place that meet their safeguarding needs.

The LAC are also aware of their responsibility to ensure that there is the appropriate level of security protection procedures are in place in order to safeguard systems, staff and learners and that there is the need to review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. The LAC will ensure that appropriate action is taken to meet the Cyber security standards for schools and colleges to improve the resilience to cyber-attacks.

Guidance:

[Cyber security standards for schools and colleges](#)

[Cyber Security Training for School staff](#)

[NEN](#)

The LAC and Trust are aware of their obligations under the [Human Rights Act 1998](#), the [Equality Act 2010](#), (including the [Technical Guidance on the Public Sector Equality Duty](#)), and their local multi-agency safeguarding arrangements.

Further guidance is found in Pg 24-26 Para 82-93 Keeping Children Safe in Education 2025 & [Equality Act 2010-Advice for schools](#)

The LAC facilitate a whole school approach to safeguarding involving everyone in school, ensuring that safeguarding is at the forefront and underpins all relevant aspects of process and policy development. These systems, processes and policies operate with the **best interests** of children at their heart of what we do.

The LAC has appointed the Designated Safeguarding Lead (DSL) who takes **lead responsibility** for safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). This is explicit in their job description, and they ensure that the DSL understands their responsibility in leading safeguarding across the school. They also ensure that the DSL is given additional time, funding, training, resources, and support needed to carry out the role effectively. See Annex C Keeping Children Safe in Education 2025.

The LAC has also identified a Deputy Designated Safeguarding Lead(s)(DDSL), who is trained to the same safeguarding standard as the DSL.

The LAC ensures that children are taught about how to keep themselves and others safe, including online. It is recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. There is an expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all students.

The following is a resource: - [Teaching about relationships, sex and health](#) and there are more listed in Annex B KCSiE including [Harmful online challenges and online hoaxes](#).

Individual schools' LACs, whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, are doing all that they reasonably can to limit children's exposure to the online risks from the school's IT system. As part of this process, LACs ensure that each school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They ensure that the Leadership Group and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. LACs and proprietors consider the age range of children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

In an individual school the LAC will ensure compliance with the completion of the Section 175/157 Safeguarding audit return, via the Phew electronic system, to the Local Authority and that any areas of concern in safeguarding are identified and a safeguarding action plan is developed.

They also ensure that the school contributes to inter-agency practice in line with [Working Together to Safeguard Children 2023](#).

In an individual school the LAC ensures that those involved with the recruitment and employment of staff to work with children have received safer recruitment training and are compliant with safer recruitment procedures. This includes the requirement for appropriate checks to be carried out in line with national guidance. When candidates have been shortlisted, they will be made aware that online searches will be carried out. See Part 3 Safer Recruitment Keeping Children Safe in Education 2025.

In an individual school the LAC has ensured that there is a whistleblowing policy and staff are aware of this policy and understand its content. We have a culture where staff can raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with agreed whistleblowing procedures in the Whistleblowing Policy.

Further guidance on [whistleblowing](#) is available here and the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call on 0800 028 0285 and the line is available from 8am to 8pm, Monday to Friday. Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

When Pell Frischmann rent out school facilities/premises to organisations or individuals (e.g. community groups, sports associations, and service providers to run community or extra-curricular activities), they will ensure that appropriate arrangements are in place to keep children safe. They are only allowed to hire school facilities/premises after 6pm and weekends.

When services or activities are provided by the LAC, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body, this is not necessarily the case.

Pell Frischmann will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate.

The LAC will ensure that safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

### **The Designated Teacher**

The LAC have appointed a Designated Teacher (DT) who works with the local authority to promote the educational achievement of registered students in each setting, who are looked after. Our Designated Teacher works across the school to promote and improve educational outcomes for children in care using evidence-based interventions.

Our designated teacher also has responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care, outside of England and Wales. They are appropriately trained and have the relevant qualifications and experience.

The Designated Teacher works closely with the Virtual School to provide the most appropriate support, utilising Student Premium Plus funding, to ensure that they meet the needs identified in the child's personal education plan (PEP). They work with the Virtual School Headteacher, to promote the educational achievement of previously looked after children. [Designated Teacher](#)

The Designated Teacher has the details of the Local Authority Personal Advisor who has been appointed to guide and support the care leaver and liaises as necessary regarding any issues of concern affecting the care leaver.

Within the Insight MAT we are attachment-aware, and trauma-informed and take a relational based approach to supporting the most vulnerable children and will work restoratively with children to improve their outcomes. The DSL and DDSL has completed the 6-day Relational and Restorative practice training with the Local Authority.

We are aware of the additional duties of the virtual school headteacher extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. [Virtual Headteacher Role-Children with a social worker](#) We understand the role that we play in improving outcomes for children with a social worker.

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

Within the Insight MAT we are committed to working in partnership with parents/carers to safeguard and promote the welfare of their children, and to support them to understand our statutory responsibilities in this area.

When new students join a school in the Trust, parents/carers will be informed that we have a safeguarding policy and that we are an Operation Encompass setting. A copy will be provided to parents on request and is available on the school website. Parents/carers will be informed of our legal duty to assist our safeguarding colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to the relevant local authority or other agencies.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a child from harm.

We will seek to share with parents/carers any concerns we may have about their child before making a referral, unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL from making a referral to the local authority in those circumstances and where it is appropriate to do so.

To keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and **at least 2 contacts**.
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).
- Any legal or criminal changes which effects parental responsibility e.g., bail conditions, court orders, Special Guardianship orders, Child arrangement orders etc

The school will retain this information on the student file. The school will only share information about children with adults who have parental responsibility for a child or where a parent has given permission and the school has been supplied with the adult's full details in writing.

We recognise that we are likely to be in regular contact with parents and carers. We will use these communications to reinforce the importance of children being safe online and parents/carers are likely to find it helpful to understand what systems schools use to filter and monitor online use. It will be especially important for parents/carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Within the Insight MAT we update parents about safeguarding through newsletters/ website/notice board in reception.

## **8. Staffordshire Early Help**

Any child may benefit from earliest or early help, but **all** staff are particularly alert to the potential need for early help for a child who: -

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer



- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care .
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sex or criminal exploitation.
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug or alcohol misuse, adult mental health issues and domestic abuse.
- is misusing alcohol or other drugs themselves.
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child and
- is persistently absent from education, including persistent absences for part of the school day

The DSL ensures that **all** staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL/DDSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the **lead professional** in undertaking an early help assessment.

Guidance documents can be accessed at the following links:

[SSCP Early Help](#)  
[SSCP Threshold Framework](#)

## **9. What happens if a referral is deemed necessary to escalate beyond early help.**

### **Child in Need (Section 17)**

If the DSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will speak with parents/child and obtain their consent for referral to social care, or the appropriate social care team if a different authority, to request an assessment. If parents refuse to give consent, but the child's needs are still not being met, the DSL may feel that a referral is still appropriate and will discuss these concerns with the local authority children's social care. Appropriate school staff will attend Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require Section 17 services.

### **Child Protection (Section 47)**

If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they make enquires under Section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare. This duty also applies if a child is subject to an emergency protection order (under S44 of the Children Act 1989) or in police protective custody (under S46 of the Children Act 1989).

Children's Services will convene an Initial Child Protection Conference (ICPC) once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference (RCPC) will take place once a child has been made the subject of a Child Protection Plan to monitor the safety of the child and the required reduction in risk. Between conferences regular meetings of a core group will take place to monitor the progress of the child protection plan.

The DSL/DDSL (sometimes other staff members) will attend the child protection conference on behalf of the school. The person attending will have as much relevant and up to date information about the child as possible. They will



contribute to a recommendation on the risks/protective factors for the family from their information and a view on the need for a child protection plan. We understand the importance of attendance and contribution at these conferences and whether we attend or not we know that there is a requirement to complete a written report prior to conference.

Child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved and will work in an open, honest, and transparent way with any parent whose child has been referred to children's social care or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and the aim is to achieve this in partnership with our parents/carers, wherever possible.

## **10. Escalation process**

Staffordshire Safeguarding Children Partnership expects members of staff working directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues within agencies, and between agencies, provides a healthy approach to the work.

This process will be kept as simple as possible and the aim will be to resolve difficulties at a professional practitioner level, wherever possible and always in a restorative way. We recognise that differences in status and experience may affect the confidence of some workers to pursue this course of action, and support should be sought from the DSL/DDSL.

If we believe that concerns regarding a child are not being addressed and outcomes are not improving, we understand the expectations that we will escalate concerns in line with the [SSCP Escalation Policy](#), until a satisfactory conclusion is reached.

Where local authority children's social care has concluded that an Initial Child Protection Conference (ICPC) is **not** required but professionals in other agencies remain seriously concerned about the safety of a child, these professionals should seek further discussion with the local authority children's social worker, their manager and/or the designated safeguarding professional lead. The concerns, discussion and any agreements made should be recorded in each agency's files.

If concerns remain, the professional should discuss with their designated lead person or senior manager in their agency. If concerns remain professionals may formally request that local authority children's social care convene an ICPC.

Local authority children's social care should convene a conference where one or more professionals, supported by a senior manager/named or designated professional requests one. If disagreement continues, Staffordshire Safeguarding Children's Partnership's escalation procedures should be followed.

## **11. A safer school culture**

### **Safer Recruitment and Selection**

Within the Insight MAT we pay full regard to Keeping Children Safe in Education 2025. Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity, checking academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks, prohibition checks whether they are known to the police and/or social care, if they have been disqualified from providing childcare and any relevant overseas

information. Evidence of these checks is recorded on each school's Single Central Record, the DSL checks the SCR every half term.

Staff who have lived or worked outside the UK **will** undergo the same checks as all other staff, even if they have never been to the UK. We will ensure that any other appropriate checks are carried out so that any relevant events that occurred outside the UK can be considered. These checks could include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

Guidance:

[Application process for criminal records checks overseas](#)  
[Regulated professions database](#)

Separate barred list checks are only be carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks have been carried out); or,
- where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as above have been carried out).

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of students.

Relevant staff have undertaken appropriate training in Safer Recruitment.

One of the trained safer recruitment staff will be involved in **all** staff and volunteer recruitment processes and sit on the recruitment panel. A member(s) of the LAC has received Safer Recruitment training.

## Induction

All staff will be made aware of the systems we have in place to support safeguarding. These are explained as part of staff induction including:-

- The Safeguarding policy.
- The Achievement and Positive Behaviour policy.
- Child on Child Abuse procedure
- The Staff Code of Conduct.
- The safeguarding response to children who go missing from education; and
- The role of the DSL (including the identity of the DSL and any deputies).
- At least part one of KCSIE 2025.

If staff, supply staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors should have a clear glass panel in them and where possible be left open. No visitors, volunteers or parent helpers will be left unsupervised with children or out of sight of the teacher or member of staff in charge. It is the responsibility of the member of staff to ensure this is the case.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

### **Use of reasonable force**

There are circumstances when it is appropriate for staff in school to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. Departmental advice for schools is available [here](#)

When using reasonable force in response to risks presented by incidents involving children including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.

By planning positive and proactive behaviour support, for instance by drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers, we will reduce the occurrence of challenging behaviour and the need to use reasonable force. All of these incidents will be appropriately recorded.

## **12. Keeping Children Safe in Education 2025 - Specific Safeguarding issues.**

**All** staff have an awareness of the following safeguarding issues through regular training and briefings. Staff are aware that these behaviours can make children vulnerable and put them in danger and that often these issues overlap. Please read and refer to Appendix 2 for additional information and guidance on the below topics.

- Abuse (incl Physical/Emotional/Sexual/Neglect) Annex 1
- Behaviours linked to safeguarding issues
- Bullying including cyberbullying
- Child on child abuse (inc sexual violence and sexual harassment/sexting-sharing of nude/semi-nude images/harmful sexual behaviour & upskirting)
- Children and the court system (5-11yrs & 12-17yrs)
- Children missing from education
- Child missing from home or care
- Children who are absent from education
- Child Criminal Exploitation (CCE)
- Child sexual exploitation (CSE)
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness and perplexing presentations.
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Homelessness

- Mental health
- Online safety
- Private fostering
- Preventing radicalisation
- Prevent Duty and Channel
- Serious violence
- Trafficking

For further information, advice and guidance on these issues please see Annex 2 of this document.

### **13. Children potentially at greater risk of harm**

All children should be protected however the staff and LAC recognise that some groups of children are potentially at greater risk of harm than others. This list is not exhaustive but highlights some of these groups: -

- Children who need a social worker (Child in Need & Child Protection)
- Children who are absent from education.
- Elective Home Education (EHE)
- Children requiring mental health support
- Looked after children (LAC) and previously looked after children (PLAC) and care leavers.
- Children with special educational needs & disabilities/health issues
- Children who are lesbian, gay, bi or gender questioning (LGBTQ+). Guidance is expected imminently.
- Children who are young carers
- Children who are affected by parental conflict and/or domestic abuse
- Children who are refugees or asylum seekers
- Children vulnerable to/at risk of/involved in CSE/CCE

We support these groups by having: -

- **Vigilance:** to have adults notice when things are troubling them
- **Understanding and action:** to be heard and understood; and to have that understanding acted upon.
- **Stability:** to be able to develop an on-going stable relationship of trust with those helping them.
- **Respect:** to be treated with the expectation that they are competent, rather than not.
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans.
- **Explanation:** to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative.
- **Support:** to be provided with support in their own right as well as a member of their family.
- **Advocacy:** to be provided with advocacy, to assist them in putting forward their views.

### **Alternative Provision**

Within the Insight MAT we know that the cohort of students in our provision often have complex needs, our LACs/proprietors are aware of this additional risk of harm that students may be vulnerable to.

The DfE Guidance clarifies that when a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil, including knowing where the child will be based during school hours. We will ensure that regular reviews of the provision take place frequently (at least half termly) to ensure the placement continues to be safe and meets the child's needs.

Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

DfE Guidance

- [Alternative provision](#)
- [Education for children with health needs who cannot attend school](#)

#### **14. Educational visitors to school.**

For educational visitors who are attending our setting in a professional capacity we will check ID and assure ourselves, if appropriate, that the visitor has had the appropriate DBS check. (or the visitor's employers have confirmed that their staff have appropriate checks).

We recognise that external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children's education, we will carefully consider the suitability of any external organisations.

We will ensure that where individuals come onto our premises that we consider the following: -

- assessing the education value,
- the age appropriateness of what is going to be delivered and
- whether relevant checks will be required.

This will form part of the risk assessment including our professional judgement and we will consider whether to seek an enhanced DBS for any volunteer not engaging in regulated activity. In doing so, we will consider:

- What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments, or volunteers.
- Whether the individual/company has other employment or undertakes voluntary activities where references can be advised, and suitability recorded.
- Whether the role is eligible for an enhanced DBS check.
- We will clearly have decided the level of supervision required through risk assessment – the supervision will be “reasonable in all the circumstances to ensure the protection of children” as stated in KCSIE 2024.
- We have clear visitor's procedure that enables us to offer pupil experiences of meeting other professionals to extend knowledge and curriculum. This clearly states whether they are supervised or unsupervised within the school.

#### **15. Allegations made against/concerns raised in relation to teachers, including supply teachers, other staff, volunteers, and contractors**

Our aim is to provide a safe and supportive environment securing wellbeing and best possible outcomes for the children at each school in the Trust. We take all possible steps to safeguard children and to ensure that the adults who work within the Insight MAT are safe to work with children. However, we do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

The LAC ensures that there are procedures in place for dealing with the two sections covering two levels (see below) of concern and/or allegations against staff members, supply staff, volunteers, and contractors.

- Allegations that **may** meet the harms threshold.
- Allegation/concerns that do not meet the harms threshold, referred to for the purposes of this guidance as '**low level concerns**'.

### Allegations that **may** meet the harms threshold

We have an good understanding and give due regard to Part 4 of Keeping Children Safe in Education 2025 guidance and [SSCB Allegations of abuse made against a person working with children](#) where it is alleged that anyone working in our education setting providing education for children under 18 years of age, including supply teachers, volunteers and contractors has:

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

This relates to members of staff, supply staff, volunteers, and contractors, who are currently working in any education setting, regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police.

We understand that if we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The LAC will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

If an allegation is made or information is received about an adult who works at our school which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Headteacher immediately. . Should an allegation be made against the Head teacher, this will be reported to the Chair of the LAC. If neither the Headteacher nor Chair of LAC is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Headteacher or the Vice Chair of Governors. The Headteacher or Chair of Governors will seek advice from the Local Authority Designated Officer (LADO) within one working day. No member of staff or the LAC will undertake further investigations before receiving advice from the LADO.

The Headteacher or Chair of Governors will seek advice from the Local Authority Designated Officer (LADO) within one working day. No member of staff or the LAC will undertake further investigations before receiving advice from the LADO.

### Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as ‘low level concerns’.

Within Insight MAT we promote an open and transparent culture in which **all** concerns about adults are dealt with promptly and appropriately. Creating this culture enables us to identify inappropriate, problematic, or concerning behaviour early, minimising the risk of abuse and ensuring that adults who work in or on behalf of the school are clear about professional boundaries and act within them in accordance with our ethos and values.

What is a low-level concern?

Low level does not mean that it is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working in or on behalf of the school may have acted in a way that is: -

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

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating students

All staff have a good understanding of what constitutes a low-level concern, and in each individual school the LAC ensure that these low-level concerns are included as part of the staff code of conduct and safeguarding policies as set out in Keeping Children Safe in Education 2025.

### **Sharing low-level concerns**

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings

If we are in any doubt as to whether information shared about a member of staff as a low-level concern in fact meets the harms threshold we will consult with the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of Governors knows to contact the LADO on 0300 111 8007.

The school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who 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. If these circumstances arise in relation to a member of staff at the school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service.

## **16. Information sharing**

We work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with Working Together to Safeguard Children 2023& [Information sharing advice for safeguarding practitioners](#)

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

As part of meeting a child's needs, the LAC recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place to set out clearly the processes and principles for sharing information within the setting and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

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

The LAC are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The LAC ensures that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

Where children leave our setting within Insight MAT, the DSL will ensure that any relevant Safeguarding file is transferred to the new setting as soon as possible, ensuring secure transit, with confirmation of receipt.

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

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

Guidance documents:

- [Data Protection: Toolkit for schools](#)

## **17. Managing complaints**

Within the Insight MAT's ethos and culture, we encourage children and parents/carers to talk to us if they are unhappy with anything to do with our setting. We have a robust internal investigation process.

The complaints policy states clearly the various stages of complaint and where to escalate concerns following completion and outcome of the complaints process. The complaints policy is available on the school website for parents/carers and is also available on request.

Safeguarding concerns should be raised with school immediately. If a concern means a child is at immediate risk, then we will contact ESAS. All visitors are given safeguarding information which outlines how to share concerns and code of conduct expected by visitors/contractors.

## **18. Site Security**

Within the Insight MAT our schools provide a secure site which is controlled by precise management directives, but the site is only as secure as the people who use it. All people on site must adhere to the rules which govern it. -

- 
- Visitors, volunteers, and students must only enter through the main entrance and after signing in at the office will be issued with a school lanyard or visitor's pass. School has a clear system of ensuring staff are accompanied / supervised by regulated staff member. Any visitor on site who is not identifiable by a visitor's pass will be challenged by any staff member and this will be reported to a member of the Leadership Group.
- Parents, carers, and grandparents attending functions have access only through the designated and supervised entrances, with tickets for visitors for appropriate school events.
- Children will only be allowed home with adults with parental responsibility or confirmed permission.
- Empty classrooms should have closed windows and doors.
- Children should never be allowed to leave school alone during school hours unless collected by an adult such as a parent who is doing so for a valid reason, or unless they have permission, as checked by school staff, to do so. They should report to the office to do this.
- Where a student leaves site without permission a parent/carer must be contacted and if the student has a social worker they must also be contacted. Where the students is a LAC the police should also be contacted.
- Members of staff are always on duty at break times.



- A health and safety audit are completed annually with risk assessment/safety planning and forms part of the Governors' annual report. This will include a fire evacuation and Prevent risk assessment.
- The risk management of site security is managed by senior leaders/governance, and we have a clear system of risk assessments and review timescales of these.

Guidance

[School and college security - GOV.UK](#)

### **Monitoring and Evaluation**

The IMAT Board will formally review this policy annually or more frequently if circumstances or legislation suggest it is appropriate.

# **Child Protection** **Information**

*Childrens Advice & Support Phone  
Number:*

**0300 111 8007**

*Email:* **[first@staffordshire.gov.uk](mailto:first@staffordshire.gov.uk)**

*Designated School Lead for Safeguarding:*  
**Sharon Metcalfe**

*Deputy Designated Lead for Safeguarding:*  
**Rachel Norman**  
**Sarah Marshall**  
**David Chamberlain**

## Safeguarding -

### The Personal Development & Welfare Team

Sir Graham Balfour Multi Academy Trust is committed to taking action to safeguard and promote the welfare of young people and vulnerable adults receiving education at school. Designated

Safe-

guarding Leads in the school are:

#### Heads of Year



**Sharon Metcalfe**

Designated Safeguarding Lead  
Deputy Headteacher  
Head of PDW



**Fraser Martin**  
Head of Year 7



**Ruth Byrne**  
Head of Year 8



**Rachel Norman**

Deputy  
Designated Safeguarding Lead  
Student Welfare Officer



**Paige Cooper**  
Head of Year 9



**Charlotte Johnston**  
Head of Year 10



**Sarah Marshall   Dave Chamberlain**

Deputy Designated  
Safeguarding Leads



**Lorren Kearney**  
Head of Year 11

## Appendix 1

### Definitions and Indicators of Abuse

1. **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 as a result 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 caregivers); or
- Ensure access to appropriate medical care or treatment.

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately dressed for the weather.
- Poor school attendance or often late for school.
- Not being brought to school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Not being taken to medical appointments.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect

**2. 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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.

- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.

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

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

The following may be signs and indicators of child sexual abuse (this is not designed to be used as a checklist but if we suspect that a child is a victim of child sexual abuse, we will refer to and/or use the resources on the [CSA Centre](#)).

**4. 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 also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.

- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

### **Parental response**

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child.
- Unrealistic expectations or constant complaints about the child.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

**Disabled Children**-When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child’s means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child’s finances; or
- Inappropriate invasive

## Appendix 2

### Specific safeguarding issues

#### Behaviours linked to safeguarding issues

All staff have an awareness of safeguarding issues that can put children at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including the link to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

#### **Bullying, including Cyberbullying**

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g., hitting, kicking, theft)
- Verbal (e.g., racist, or homophobic remarks, threats, name-calling)
- Emotional (e.g., isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including sexting)

Guidance on bullying can be found in the following links:

[Preventing & tackling bullying](#)  
[Cyberbullying advice](#)

#### **Child on child abuse (incl sexual violence and sexual harassment)**

**All** staff have the knowledge and awareness that children are capable of abusing other children (including online). All staff are clear about this school's policy and procedure regarding child-on-child abuse. We have a separate Child-on-Child Abuse Procedure in addition to anti-bullying and behaviour policies to guide, inform and support children, staff and parents/carers – see Appendix 7.

Child-on-child abuse can occur, both physically and verbally, either online or face to face, between two children of **any** age and sex, with a single child or group of children and can happen both inside and outside of the setting. Children who are victims of this abuse, will find the experience stressful and distressing and it is likely to have an adverse effect their educational attainment. This type of abuse can exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

Within the Insight MAT **all** staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports of it. They understand the importance of the **timely** challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature. They are aware of the importance of: -

- Making clear that child-on-child abuse including sexual violence and sexual harassment, is never acceptable and that that we have a zero-tolerance approach.
- Not dismissing this abuse as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g. grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts.

**All** staff know that if we do not challenge and support children that this will lead to a **culture** of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report.

We have well promoted and easily understood systems in place so that children feel confident to knowing their concerns will be treated seriously.

**All** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college will not be downplayed and will be treated equally seriously. 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. We will ensure that children know that the law is in place to protect them rather than criminalise them, and we will be explained in such a way that avoids alarming or distressing them.

Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND and LGBT children are at greater risk. The DfE states 'child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Victims of child-on-child abuse will be supported by the school's pastoral system and referred to specialist agencies if appropriate. Risk assessment and/or safety planning are an integral part of this support plan, particularly regarding the post incident management.

**All** staff understand, that even if there are no reports in the setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such it is important that if staff within the Insight MAT have any concerns regarding child-on-child abuse, they speak to their Designated Safeguarding Lead (DSL) or deputy (DDSL). Staff will not develop high thresholds before acting.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration and sexual assault and may include an online element which facilitates, threatens and/or encourages sexual violence. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and



- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff are aware of the importance of understanding intra familial harms and any necessary support for siblings following incidents.

**All staff are** clear as to the school's or college's policy and procedures with regards to child-on-child abuse and the important role they play in preventing it and responding where they believe a child may be at risk from it.

If staff have a concern about a child or a child makes a report to them, they will follow the safeguarding referral process. The Achievement and Positive Behaviour policy will support any sanctions.

The DfE states 'child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Guidance Documents:

- [CSA Centre](#)
- [Hackett Tool](#)
- [Disrespect No Body campaign](#)
- [CEOP-Safety centre](#)
- [UKCIS Guidance: Sharing Nudes and Semi-Nudes](#)
- [Review of sexual abuse in schools and colleges - GOV.UK \(www.gov.uk\)](#)
- [Searching, screening and confiscation \(publishing.service.gov.uk\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)
- [Undressed \(lgfl.net\)](#)

### **Children Missing Education**

All professionals working with children, as well as the wider community can help by remaining vigilant to children's safety. The law states every child should be receiving an education, and we stand a better chance of ensuring a child's safety if we know where and how they are receiving this. The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory school age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who go missing from education.

A child going missing, particularly repeatedly, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Using professional curiosity to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

We understand our responsibility to link school absence/missing episodes with the impact this has on the child's education. We know that there is a distinction between a child being absent and when they are subject to a missing episode and the importance of acting on this information and reporting a missing episode when appropriate. We have a key role in sharing information with the police and any lead practitioner involved with the family when a child is reported missing. We will provide, when required, an appropriate environment for a Return Home Interview (RHI) within the education setting, where possible and will contribute to safety planning when required. We will follow our attendance policy for children who are regularly and persistently absent.

If a child is not known to the Local Authority or other agencies but there are remaining safeguarding concerns, we will consult the [SSCP Threshold Framework](#) and ensure that any concerns are reported to the appropriate agencies/partners.

The school holds **at least 2** emergency contact numbers for each student. If a child goes missing from the school and we are unable to locate them, we will inform parents/carers and we will also contact the Police to report them missing. This will ensure that the Police and other partners have a true picture of missing episodes, which are indicators of risk for some children.

Please ensure that your policies are clear regarding children going missing from the school site and that **ALL** staff are aware of the processes and the role that they **ALL** play in this. In particular the importance of the completing class registers at the earliest opportunities.

The school will notify the Local Authority of any student who fails to attend school regularly after making reasonable enquiries or has been absent without the school's permission for a continuous period of 10 days or more. The school (regardless of designation) will also notify the Local Authority of any student who is to be deleted from the admission register because s/he:

- Has been taken out of school by their parents and is being educated outside the school system (e.g. elective home education).
- Has ceased to attend school and no longer lives within a reasonable distance of the school at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the school of the change).
- Has been certified **by a medical professional** ~~the school medical officer~~ as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither s/he nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- Is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe that s/he will return to the school at the end of that period
- Displaced because of a crisis e.g. domestic violence or homelessness; or
- Has been permanently excluded.

The school will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered 'missing'

### **Children who are absent from education**

Children being absent from education for prolonged periods and/or on repeated occasions can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support, includes:

- Working together to improve school attendance including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children missing education .

- Further information for colleges providing education for a child of compulsory school age can be found in: [Full-time enrolment of 14 to 16-year-olds in further education and sixth-form colleges](#)

### **Child Missing from Home or Care**

There are strong links between children involved in criminal and sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children.

Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Guidance document

- [Children who run away or go missing from home or care](#)

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Where DSL/DDSL are concerned regarding student who are displaying behaviours of a young person at risk of CSE/CCE a Risk Factor Matrix will be completed, with a Social Worker if applicable, and sent to catch22 and the MACE panel for their input. The DSL/DDSL of a school within the Insight MAT are expected to attend the MACE panel where a student is being discussed.

We are aware of the [Child Exploitation Risk Screening Tool](#) and use this at the earliest opportunity to understand the risk factors in a child's life.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm, from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

Guidance documents:

- [Safeguarding children who may have been trafficked](#)
- [Child Exploitation - StaffsSCB](#)

### **Child sexual exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

Guidance documents:

- [Child Sexual Exploitation Definition & Guidance](#)

### **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/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. 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.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the

National Referral Mechanism (NRF) should be considered. Further information can be found here [National Referral Mechanism](#)

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation: -

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Guidance Document:

- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)
- [County Lines toolkit](#)

### **Domestic Abuse including Operation Encompass**

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Children living in households where domestic abuse takes place should be considered and treated as victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse) Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. We will signpost and support children/ young people.

### **Operation Encompass**

Our DSL/DDSL has completed the National Operation Encompass training and therefore we are an Operation Encompass setting. This enables police and education settings to work together to provide emotional and practical help to children. It ensures that we have up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

If you require further information in relation to Operation Encompass, please use this link below [Operation Encompass](#)

Guidance Documents:

- 
- [NSPCC-Domestic Abuse](#)
- [Refuge-Domestic abuse & effects on children](#)
- [Domestic abuse: specialist sources of support](#)
- Operation Encompass helpline 0204 513 9990 (8am-1pm Mon-Friday)

## Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation.

Guidance Documents:

- [NSPCC-Parental Substance Misuse](#)
- [SSCB-Working with parents who misuse substances](#)
- [Drugs Advise for Schools](#)

## Fabricated or Induced Illness (FII)

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be several explanations for these circumstances, and each requires careful consideration and review.

Concerns about a child's health should be discussed with a health professional who is involved with the child.

Guidance Documents:

In Staffordshire we use the following guidance

[FII-PP Pathway](#)

[NHS-Overview-Fabricated or Induced Illness](#)

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL are aware of local contact details and referral routes into local housing organisations, so they can raise/progress concerns at the earliest opportunity.

Indicators of risk include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this will **not** replace a referral into children's social care where a child has been harmed or is at risk of harm.

We also recognise that in some cases 16/17 yr olds could be living independently from their parents or guardians and they will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL will ensure that appropriate referrals are made based on the child's circumstances.

## Honour-based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors, when deciding what form of safeguarding action to take. All forms of HBA are

abuse (regardless of the motivation) and should be handled and escalated as such. 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)**

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. It is known by several names including “cutting”, “female circumcision” or “initiation”. The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to “honour-based abuse”.

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and children should not be examined but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures.

Guidance Documents: -

- [Multi Agency Statutory guidance on Female Genital Mutilation](#)
- [Female Genital Mutilation Act 2003](#)

### **Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one, entered, **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 a marriage. The threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived culture practices, to coerce a person into marriage. Schools and colleges play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person’s parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be ‘one chance to save a life’. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.



From February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Guidance Document:

- [Forced Marriage](#)
- [The right to choose: government guidance on forced marriage](#)

### **Mental Health**

All staff have an important role to play in supporting the mental health and wellbeing of students and **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. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

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

Where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Guidance and helpful documents: -

- [Addressing Trauma and Adversity](#)
- [Mental Health and Behaviour in Schools Guidance.](#)
- [Preventing and tackling bullying](#)
- [Every Interaction Matters](#)
- [MIND-Parenting Capacity and Mental Health](#)
- [NSPCC-Mental Health and Parenting](#)
- [SSCB-Children & Young People who Self Harm or Disclose an Intent to Die by Suicide](#)
- Staffordshire County Council Resource Bank (sent out at least annually)

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and by speaking to the designated safeguarding lead or a deputy.

### **Online Safety**

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sextortion, sexual predation, and technology often provides the platform that facilitates harm.

Within the Insight MAT we realise that it is essential for children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole school/college approach to online safety which empowers us to protect and educate students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

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

- **Content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.



- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have appropriate filtering and monitoring systems in place on school devices and school networks, and these are regulated, and risk assessed as part of the prevent duty.

Our filtering and monitoring standards will;

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs

The LAC will review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

We have an online safety policy which identifies the usage and expected behaviour of children/students. As a school we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding.

Education at home/Remote learning: - Where children are being asked to learn online at home, the school will refer to and use the links and resources provided by the DfE; Safeguarding in schools, colleges and other providers and safeguarding in remote education.

Guidance Documents:

- [Children's Commissioner-Online Safety](#)
- [Teaching online safety in education settings](#)
- [Appropriate Filtering and Monitoring](#)
- [CEOP-Safety Centre](#)
- [National Cyber Security Centre](#)
- [NSPCC-Undertaking remote teaching safely](#)
- [360 Degree Safe - Online Safety Review Tool](#)
- [UKCCIS-UK Council for Child Internet Safety](#)

### 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 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.

- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

Staff within the Insight MAT will notify the DSL/DDSL when they become aware of a private fostering arrangement. There is a mandatory duty on the school to inform Staffordshire Children's Social Care of a private fostering arrangement by contacting (0800 1313126), who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Guidance Document:

- [Children Act 1989 – Private Fostering](#)

## Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Within the Insight MAT we value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Students and school staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Within the Insight MAT it is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the school's safeguarding duty.

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Prevent Duty and Channel

## Prevent Duty

The school governors, the Headteacher and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE/PSHE curriculum, SEND

Effective Date: 10.12.2025

Safeguarding Policy

Issue: v9.0

policy, the use of school premises by external agencies, integration of students by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

All schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" ). This is known as The Prevent Duty and is part of our schools wider safeguarding obligations.

Designated safeguarding leads and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales.). We follow the guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The school has a Prevent Single Point of Contact (SPOC) who is the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL.

The School will monitor online activity within the school to ensure that inappropriate sites are not accessed by students or staff. This is best done using specialist online monitoring software, the Insight MAT favours SENSO but recognises schools within the MAT may choose to use their own versions.

Guidance Documents:

- [The Prevent Duty.](#)
- [Educate Against Hate](#)
- [ACT Early | Prevent radicalisation](#)

### **Serious Youth Violence**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Guidance documents:

- [Home Office Preventing Youth Violence and Gang Involvement](#)
- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)

### Allegations about a Member of Staff (Incl supply), Governor or Volunteer

1. Inappropriate behaviour by staff/supply staff/volunteers could take the following forms:
  - **Physical**  
For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.
  - **Emotional**  
For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability, or sexuality.
  - **Sexual**  
For example, sexualised behaviour towards students, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault, and rape.
  - **Neglect**  
For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.
  - **Spiritual Abuse**  
For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.
2. If a child makes an allegation about a member of staff, supply staff, Governor, visitor or volunteer the Headteacher must be informed immediately. The Headteacher must carry out an urgent initial consideration to establish whether there is substance to the allegation. The Headteacher should not carry out the investigation him/herself or interview students.
3. The Headteacher will exercise and be accountable for their professional judgement on the action to be taken as follows:
  - If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the Headteacher will notify the Staffordshire Designated Officer **via the [LADO Referral form](#)** . The LADO will liaise with the Chair of Governors and advise about action to be taken and may initiate internal referrals within Staffordshire Children's Social Care to address the needs of children likely to have been affected.
  - If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the student. These should be addressed through the school's own internal procedures.
  - If the Headteacher decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child safeguarding file.
4. Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers). In no circumstances will the school/college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The LAC will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.
5. Where an allegation has been made against the Headteacher, then the Chair of the LAC takes on the role of liaising with the LADO in determining the appropriate way forward. [Managing Allegations of Abuse against a person who works with children](#)

## **Appendix 4**

### **Indicators of Vulnerability to Radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

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

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results the above points

We are aware the types of behaviours that are indicative of the kind of promotion or advancement relevant to the definition and are an important guide to its application. [New definition of extremism \(2024\) - GOV.UK](#)

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the student may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special Educational Need – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list is not exhaustive, nor does it mean that all children experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Family members convicted of a terrorism act or subject to a Channel intervention.

Effective Date: 10.12.2025

Safeguarding Policy

Issue: v9.0

- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

**SPOC Contacts**

<b>Prevent Leads</b>	<b>Contact Name</b>	<b>Email Address</b>
<b>Cannock</b>	Karla Vowles	<a href="mailto:KarlaVowles@cannockchasedc.gov.uk">KarlaVowles@cannockchasedc.gov.uk</a>
	Oliver Greatbatch	<a href="mailto:olivergreatbatch@cannockchasedc.gov.uk">olivergreatbatch@cannockchasedc.gov.uk</a>
<b>East Staffs</b>	Mike Hovers	<a href="mailto:Michael.hovers@eaststaffsbc.gov.uk">Michael.hovers@eaststaffsbc.gov.uk</a>
	Sal Khan	<a href="mailto:sal.khan@eaststaffsbc.gov.uk">sal.khan@eaststaffsbc.gov.uk</a>
<b>Lichfield</b>	Susan Bamford	<a href="mailto:Susan.Bamford@lichfieldddc.gov.uk">Susan.Bamford@lichfieldddc.gov.uk</a>
<b>Newcastle</b>	Georgina Evans	<a href="mailto:Georgina.Evans@newcastle-staffs.gov.uk">Georgina.Evans@newcastle-staffs.gov.uk</a>
<b>South Staffs</b>	Maggie Quinn	<a href="mailto:M.Quinn@sstaffs.gov.uk">M.Quinn@sstaffs.gov.uk</a>
<b>Stafford</b>	Victoria Cooper	<a href="mailto:vcooper@staffordbc.gov.uk">vcooper@staffordbc.gov.uk</a>
<b>Staffs Moorlands</b>	David Smith	<a href="mailto:david.smith@staffsmoorlands.gov.uk">david.smith@staffsmoorlands.gov.uk</a>
<b>Tamworth</b>	Joanne Sands	<a href="mailto:joanne-sands@tamworth.gov.uk">joanne-sands@tamworth.gov.uk</a>
<b>Staffordshire County Council (Safer Communities)</b>	Fiona Chapman	<a href="mailto:fiona.chapman@staffordshire.gov.uk">fiona.chapman@staffordshire.gov.uk</a>
<b>Staffordshire Police Prevent Team</b>	Sgt. Darren McGrath	<a href="mailto:prevent@staffordshire.police.uk">prevent@staffordshire.police.uk</a>

## **Appendix 6**

### **Role of the Staffordshire LADO**

The Staffordshire LADO (Local Authority Designated Officer) promotes a safer children's workforce by providing effective guidance, advice, and investigation oversight to cases. They may be able to offer advice and assist with communication in situations which sit outside the statutory criteria, albeit at the discretion of the LADO and where the broader goals of a safer children's workforce are relevant.

The service will give advice on how concerns or allegations should be investigated, including if a referral needs to be raised with the Police and/or Children's Social Care. Staffordshire LADO is not directly responsible for investigatory activities but will actively support any investigation and give advice around a range of parameters including suspension, possible media interest, when to tell the adult, and ensure all interested parties are appropriately linked together. They will retain oversight of individual cases to ensure concerns or allegations are investigated thoroughly in a fair and timely manner, and will advise in relation to any subsequent duties to communicate with regulatory bodies and/or the DBS.

The StaffsSCB inter-agency procedures for: [Allegations of Abuse - SSCP](#) is based on the framework for dealing with allegations made against an adult who works with children, this is detailed in **Working Together to Safeguard Children 2023** and should be followed by all organisations providing services for children and young people. Compliance with these procedures will help to ensure that allegations are dealt with consistently and in a timely manner, that a thorough, proportionate, and fair process is followed and that processes are open to challenge.

Arrangements for managing concerns or allegations of this nature should be robust and effective in keeping children safe. All allegations should be taken seriously, approached with an open mind, and not be driven by preconceived opinions about whether a child has or has not been harmed.

Relationships is available which will help individuals form judgements on what may constitute behaviour that is unsafe or abusive.

*Who to refer concerns to:*

All reports of concern or allegation to the Staffordshire LADO (Local Authority Designated Officer) that an adult working or volunteering with children:

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

**Step 1:** Follow KCSiE 2025 Guidance. Headteacher/ Chair of Governors will contact the LADO [LADO Referral form](#)

This single referral point will provide a responsive and inclusive service for all children's workforce sectors, focus the advice and support where it is needed most and enable the team to continue to work effectively with partners.



### Useful safeguarding contact

- Staffordshire Education Safeguarding Advice Service (ESAS) on 01785 895836 or email [esas@staffordshire.gov.uk](mailto:esas@staffordshire.gov.uk)
- Local Authority Designated Officer – all referrals via form
- Staffordshire Families Integrated Front Door (SFIFD) 0300 111 8007
- Emergency Duty Services (EDS-Emergency safeguarding concerns) 0345 604 2886 or email [eds.team.manager@staffordshire.gov.uk](mailto:eds.team.manager@staffordshire.gov.uk)
- Stoke-on-Trent Children's Services: Chat and Advice Service (CHAD) 01782 235100  
Emergency Duty Team: 01782 234234 (outside office hours)
- Staffordshire Police Prevent Team 01785 232054, 01785 233109 or email [prevent@staffordshire.police.uk](mailto:prevent@staffordshire.police.uk)
- PHSE Coordinator Natalie McGrath [natalie@staffscvys.org.uk](mailto:natalie@staffscvys.org.uk)
- Child Exploitation and Online Protection Centre [CEOP](http://CEOP.org.uk)
- NSPCC– 24-hour Child Protection Helpline 0808 800 5000 NSPCC Staffs School contacts [rachel.willis@nspcc.org.uk](mailto:rachel.willis@nspcc.org.uk) & [Matthew.Harding@nspcc.org.uk](mailto:Matthew.Harding@nspcc.org.uk)
- [Stop It Now! child sexual abuse helpline](http://StopItNow.org.uk)
- Women's Aid - 24 Hour Helpline: 0870 2700 123
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999. [Unicef](http://Unicef.org.uk)

### **National Contacts**

- CEOP (Child Exploitation and Online Protection) [CEOP Safety Centre](http://CEOP.org.uk)
- Professionals Online Safety Helpline – 0844 381 4772 [Safer Internet Helpline](http://SaferInternet.org.uk)
- Internet Watch Foundation (IWF) – [Internet Watch Foundation](http://InternetWatchFoundation.org.uk)
- Professionals Online Safety Helpline (POSH) 0344 3814772. Email [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- Childline – 0800 1111 [Childline](http://Childline.org.uk)
- Ofsted – General enquiries: 0300 123 1231  
About Schools: 0300 123 4234  
Concerns: 0300 123 4666  
e-mail: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)
- HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders) [www.educateagainsthate.com](http://www.educateagainsthate.com)
- NSPCC Harmful Sexual Behaviour project: 0844 892 0273

## **Appendix 7**

### **Insight MAT (in conjunction with Staffordshire Safeguarding Children Board)**

#### **Child on child Abuse Procedure (Including Sexual Violence and Sexual Harassment between children)**

Aspects of the procedure are within the Keeping Children Safe in Education 2021 and Achievement and Positive Behaviour Policy

#### **Purpose of the Procedure**

The purpose of this procedure is to:

- Provide clarity on what is meant by child-on-child abuse in all its forms
- Understand the culture within the setting
- Evidence how ALL staff support the children in the setting
- Give children confidence that they will be supported and informed
- Give parents/carers the assurance that staff know how to deal with this abuse
- Evidence how safeguarding staff handle reports/concerns/disclosures
- Inform of the post incident management process/ongoing support/safety planning

#### **Child on child abuse - What is it?**

Child on child abuse is any form of physical, sexual, emotional and financial abuse using coercion/power and/or control by an individual child or group of children and is exercised between children and within their relationships (both intimate and non-intimate).

**All** staff in Sir Graham Balfour recognise that children can abuse their peers and are aware of the different forms that these safeguarding issues take:

- Bullying-emotional/physical so **repeated** behaviour which is intended to hurt someone either emotionally or physically (hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm)
- Online/Cyber bullying
- Prejudiced relating bullying
- Sexual Violence, Sexual Harassment and Sexually Harmful behaviour.
- Sexting sharing of nude or indecent (youth produced sexual imagery).
- Abuse in intimate relationships, including teenage relationship abuse
- Initiation/hazing type violence and rituals.
- Hate crime
- Gang association and serious violence - County Lines
- Radicalisation

This abuse can be motivated by perceived differences. e.g. on grounds of race, religion, gender, sexualorientation, disability or other differences and result in significant, long lasting, and traumatic isolation, intimidation, and/or violence to the victim.

***We will record all instances of Child on Child Abuse and inform parents /carers of such incidents.***

### **Sexual Violence, Sexual Harassment and Sexually Harmful Behaviour (SHB)**

Sexual Violence, Sexual Harassment and Sexually Harmful Behaviour (SHB) can occur between two children of any age and sex or with groups of children by sexually assaulting or sexually harassing a single child or group of children.

We recognise that this behaviour can take place in a school or any setting where students are together and that the impact of this behaviour on children can be extremely distressing, impacting on their emotional health and wellbeing as well as affecting their academic achievement.

### ***Sexual Violence and Sexual Harassment must be referred immediately to the Designated Safeguarding Lead (DSL)***

**Sexual Violence** - For this procedure 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.

**Sexual Harassment** - For this procedure we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. We refer to this 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. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names
- Sexual “jokes” or taunting
- Physical behaviour, such as deliberating brushing against someone, interfering with someone’s clothes and displaying pictures, photos, or drawings of a sexual nature; and
- Online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); sexualised online bullying and inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

**Sexually Harmful Behaviour (SHB)** In this policy we recognise the importance of distinguishing between healthy, problematic, and sexually harmful behaviour.

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour,

and it may be just as distressing to the young person who instigates it as to the young person it is intended towards. It may include:

- inappropriate sexual language
- inappropriate role play
- sexual touching
- sexual assault/abuse

**Consent** is when someone **agrees by choice** and has the **freedom** and **capacity** to make that choice. It is important to note that:

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape
- A person cannot give consent if under the influence of alcohol and/or drugs.

### **Sexting - the sharing of nude or indecent imagery (youth produced sexual imagery)**

The term 'sexting' relates to the sending of indecent images, videos and/or written messages with sexually explicit content; these are created and sent electronically. They are often 'shared' via social networking sites and instant messaging services. These images may have been because of upskirting.

### **Initiation/Hazing**

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as sports team, etc. There are several different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The ceremony welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

### **Teenage relationship abuse**

Teenage relationship abuse is a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, to gain power and maintain control over the partner. This abuse may be child sexual exploitation.

### **Responding to a concern/incident/disclosure of child on child abuse**

**Child on child** abuse may occur in Sir Graham Balfour, on the way to or from the setting or out in the community. Consideration will be given to many aspects of the abuse and here are a few examples:

- Does it involve a single incident or has occurred over time?
- Is the behaviour problematic and concerning?
- Does it involve any overt elements of victimisation or discrimination, e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability?
- Is there any element of coercion or pre-planning?

- Does it involve a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power?
- Has there been a misuse of power?

It is also important that we:

- ascertain if there were there any witnesses to the abuse
- make notes and record ALL conversations with children spoken to as well as parents/carers/other professionals, including any actions taken
- treat all children involved as being at potential risk - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves
- ensure that a safeguarding response is in place for both child and alleged perpetrator

Consideration should also be given to supporting children who have witnessed peer on peer abuse of any kind. This is likely to be traumatic and support may be required. We will signpost to agencies and support services available where needed.

We will do all that we can to ensure both the child and alleged perpetrator, and any witnesses, are not being bullied or harassed following this. Social media is likely to play a part in the fall out from any incident and friends from either side could well harass the victim or alleged perpetrator online as well as face to face. Any evidence we have of students using social media inappropriately will be sanctioned according to existing policies.

### **Responding to all reports and concern of sexual violence and/or sexual harassment between children.**

Guidance is clear in that it does not attempt to provide (nor would it be possible to provide) detailed advice on what we should do in any or every particular case; it provides effective safeguarding practice and principles for us to consider in the decision-making process and on a case by case basis.

The Designated Safeguarding Lead (DSL) and deputies (DDSLs) will take the lead role when dealing with this type of abuse using their professional judgement and working together practices. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure and it is important to maintain a calm, considered and appropriate response to any reports.

We understand that it is not easy for children to tell us about this type of abuse, and they may struggle to make a direct verbal report. Therefore, observations of changes in presenting behaviours is key.

We understand the importance of our initial response to a report and how this can encourage or undermine the confidence of children of sexual violence and sexual harassment. The culture in the setting is key to this.

On occasions the child may not wish for their identity to be known and there are no easy or definitive answers when this is requested. If the child does not give consent to share information, we may still lawfully share it, if it can be justified to be in the public interest. For example, to protect children from harm and to promote the welfare of children.

The Designated Safeguarding Lead will consider the following:

- The wishes of the victim in terms of how they want to proceed
- The child should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered - we will balance this aspect and the need to balance our duty and responsibility to protect other children
- The nature of the alleged incident(s) including might a crime have been committed and consideration of any display of harmful sexual behaviour
- The ages of the students involved
- The developmental stages of the students involved
- Any power imbalance between the students (e.g. Is the alleged perpetrator significantly older? Does the child have a disability or learning difficulty?)
- If the alleged incident is a one off or a sustained pattern of abuse (the sustained pattern of abuse may not just be of a sexual nature)
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Whether there are ongoing risks to the victim, other children, adult students, or staff
- Other related issues and wider context, including links to any forms of child exploitation

When we talk about Sexual Violence and Sexual Harassment between children, we will refer to 'child' and 'alleged perpetrator'. This does not mean that we are taking sides nor making any judgement, but for the purpose of this policy we will refer to children involved in this way.

**Victim** – we will refer the victim as a child:

- listen and take any disclosure seriously
- never make them feel that they are creating a problem or be ashamed
- reassure them that they will be kept safe
- handle the situation with sensitivity
- use proper names for body parts but record exactly any language or vocabulary used by the child
- ask open questions and not lead the child
- ascertain where the abuse occurred as this may highlight 'hot spots' or vulnerable locations in the setting or within the community which may need to be revisited by either ourselves (in school) or by alerting police/partners if it is in the community
- ascertain if other children witnessed this abuse
- consider ongoing support within the setting
- consider any referrals for external support

Parents or carers of the child will be informed (unless this would put the victim at greater risk). Rape, assault by penetration and sexual assaults are crimes and the DSL will have to balance the victim's wishes against their duty to protect the victim and other children within the school setting. If we do decide to make a referral to children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, the reasons will in most cases be explained to the victim and appropriate specialist support offered. We will also consider the following:

- The wishes of the child in terms of how they want to proceed
- That the victim(s) should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be

offered. (We will balance this aspect and the need to balance our duty and responsibility to protect other children)

- The nature of the alleged incident(s) including might a crime have been committed and consideration of any display of harmful sexual behaviour.
- The ages of the students involved
- The developmental stages of the students involved
- Any power imbalance between the students (e.g. is the alleged perpetrator significantly older? Does the victim have a disability or learning difficulty?)
- If the alleged incident is a one off or a sustained pattern of abuse (the sustained pattern of abuse may not just be of a sexual nature)
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Are there ongoing risks to the victim, other children, adult students, or staff
- Other related issues and wider context, including links to any forms of child exploitation

We will give all the necessary support for the victim to remain in school; however, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college will be considered to enable them to continue to receive suitable education. This will only be at the request of the victim (and following discussion with their parents or carers).

**Alleged perpetrator** - When we speak to the 'alleged perpetrator' we will:

- listen to what they say and not dismiss their account
- handle the situation with sensitivity and a non-judgemental approach
- offer ongoing support
- record all conversations and all action taken
- consider any referrals for external support, e.g. Youth Offending Service/Catch 22

When to inform the alleged perpetrator will be a decision that will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, we will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations.

There are four likely scenarios we will need to consider when managing any reports of sexual violence and/or sexual harassment:

- a) **Manage internally** - In some cases of sexual harassment (for example, one-off incidents), we may take the view that the students concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally using our own sanctions in line with the Achievement and Positive Behaviour and Anti-Bullying policies and by providing pastoral intervention and support.
- b) **Early Help** - We may decide that the children involved do not require statutory interventions but may benefit from early help where we are the lead professional. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. This will help to evidence the support that we have given, the work undertaken and if desired outcomes have been achieved

- c) Referral to social care - At the point of referral to children's social care, we will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk).  
If a referral is made, children's social care will then make enquiries to determine whether any of the children involved need protection or other services. Where statutory assessments are appropriate, the DSL or DDSL should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- d) Referral to the police - See Section 4 below

### **Reporting to the Police**

At Insight MAT we understand our responsibilities to call the Police and reporting forms of child on child abuse. This does not mean that we are looking to criminalise children, and this may not always be necessary.

The guidance that we follow is:

[When to call the police \(guidance for schools and colleges\)](#)

[Outcome 21 Sexting Guidance](#)

In any form of child on child abuse where it is believed that an offence has been committed, a report may be made to the Police.

Where a report has been made to the police, we will consult with the police and agree what information is appropriate to disclose to staff and others, in particular the alleged perpetrator and their parents or carers. We will also discuss the best way to protect the victim and their anonymity.

This may also include the development of a clear and robust safety and support plan as part of this early help process. However, as you will see further on in this policy, risk assessing and safety planning is a key aspect of all child on child abuse.

With regard to sexual violence and sexual harassment between children, where there is a report of a rape, assault by penetration or sexual assault, the starting point is that this should be passed to the police who will advise and log according to their own guidelines.

### **Working with our parents and carers**

At Insight MAT we will, in most instances, engage with both the child's and the alleged perpetrator's parents or carers when there has been a report of peer-on-peer abuse including sexual or sexual harassment. The exception to this rule is if there is a reason to believe that informing a parent or carer will put a child at additional risk.

We will carefully consider what information provided to the respective parents or carers about other children involved and when to do so.

It should be the case that we will meet the child's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the child and understand their wishes in terms of support they may need and how the report will be progressed.



It is also likely that we will meet with the alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact the alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education.

We will be clear and transparent and explain the reason behind any decisions. Support for the alleged perpetrator will be discussed including any referrals, if appropriate.

We realise that parents and carers may well struggle to cope with a report that their child has been the victim of an assault or is alleged to have assaulted another child. Details of organisations that support parents are provided on the school website and at the end of the policy.

### **Sanctions**

We will decide appropriate sanctions on a case-by-case basis in line with the Achievement and Positive Behaviour Policy and any graduated response required.

We will take their behaviour seriously and again use a graduated response to this, whilst also educating them the importance of resolving any conflict in a respectful and restorative way.

If there is police involvement, we will work closely with them to ensure that any disciplinary action taken by us, as a result of the incident, does not jeopardise the police investigation.

### **Post Incident Management**

It is vital that all children involved in child on child abuse are given appropriate and ongoing support for as long as it is required/needed. This may include referrals to other agencies/professionals outside the setting and this decision will be made in conjunction with the children, their parents/carers, and other professionals.

If there are other professionals involved, then we will liaise with those colleagues to ensure that we are working together and understand one another's role in this support.

There may be delays in any case that is being progressed through the criminal justice system. However, we will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator, and other children in the school and moving forward with our post incident management.

**Support planning** is vital, and it is imperative that following any incident the children involved continue to feel supported and receive help even if they tell us that they are coping and managing. Sometimes feelings of embarrassment, remorse, regret, or unhappiness may occur at a much later stage. We will do our best to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). For this reason, regular reviews with the young people following the incident(s) will happen as part of this plan.

**Referrals** may have already happened as mentioned previously in this policy, but it is important to establish which professionals continue to work with ALL children involved in this process and this is helped with robust planning.

## Safety planning/Risk assessment

Integral to post incident management is robust safety planning/risk assessment and this is an invaluable and necessary process. It is one of the key priorities as part of the post incident management. When looking at this process, consideration should be given to the following:

- if this is an ongoing police investigation, we will ask the police if we have any questions about the progress of the matter for example, are there any bail conditions in place or has there been a charging decision. It is key to have a central point of contact with the police for updates and progress. Where required, advice from the police will be sought to help us to manage our safeguarding responsibilities. Where bail is deemed proportionate and necessary, as above, we will work with children's social care and the police to manage any implications and safeguard children
- the importance in ensuring that the child can continue in their normal routine, including continuing to receive a suitable education
- the importance of the alleged perpetrator in continuing to access education and support
- do the child and alleged perpetrator share classes
- what measures need to be put in place when children move between lessons/classes
- what measures need to be put in place for unstructured time (break and lunchtimes)
- what measures need to be put in place for the arrival at the start of the school day and leaving at the end of the school day
- does the child and alleged perpetrator travel to and from school using the same form of transport
- appropriate information sharing with staff in the setting in order that the plan is manageable and as successful as possible
- if it is the case that the alleged perpetrator is moved to another educational institution (for any reason), then we will ensure that the new educational institution is made aware of any ongoing support needs.

In all cases, we will record the decision making together with the rationale behind those decisions. All the above will be considered with the needs and wishes of the child at the heart of all that we do as part of this process (supported by parents and carers as required). The safety plan/risk assessment will be kept under review.

## **Appendix 8**

### **Allegations of abuse made against staff**

#### **Section 1: allegations that may meet the harms threshold**

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
- We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Headteacher, or the Chair of Governors where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

#### **Suspension of the accused until the case is resolved**

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Insight MAT.
- If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

## 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, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the Police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the Police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the Police or children's social care services, where necessary). Where the Police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, Police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the Designated Safeguarding Lead (DSL) and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the Police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff are strongly encouraged to join a trade union and where this is the case, they should contact their representative for advice. The Business Manager of the school will also be able to offer contact details of the Insight MAT's counselling service.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the Police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

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

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to the standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome
- The LAC will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of the process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

## **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

## **Specific actions**

### **Action following a criminal investigation or prosecution**

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

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

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

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

## **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

## **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

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

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

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

### **Record-keeping**

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the Police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

- Include substantiated allegations, provided that the information is factual and does not include opinions

### **Learning lessons**

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

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### **Non-recent allegations**

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

We will report any non-recent allegations made by a child to the LADO in line with the local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the Police.

### **Section 2: concerns that do not meet the harm threshold**

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks
- We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.



### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- staff should be made clear what constitutes a low-level concern via the Staff Code of Conduct
- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
- Examples of such behaviour could include, but are not limited to:
  - Being overly 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
  - Using inappropriate sexualised, intimidating or offensive language

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Having an open-door policy to senior leaders and Safeguarding staff.

### **Responding to low-level concerns**

If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses
- The Headteacher must contact the LADO to seek advice if they are concerned whether the low-level concern has met threshold

- The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's disciplinary policy and staff code of conduct.

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## **Appendix 9**

### **Areas of Safeguarding which are specific to Sir Graham Balfour School.**

#### **The Role of the Local Academy Committee (LAC)**

The Safeguarding link is Mike Winkle, Chair of Governors. He provides strategic direction of Safeguarding. There is a half-termly formal meeting between the Chair of Governors and the DSL. The DSL reports directly to the Standards, Curriculum and Students and Community which includes the number and nature of incidents raised, number and nature of incidents referred to the ESAS and first response. Current caseload is also reported. This forms part of the Headteacher's report to the LAC.

#### **Role and responsibility of DSL/DDSL**

The DSL is Sharon Metcalfe, Deputy Headteacher i/c of Personal Development and Welfare. DDSLs are Rachel Norman, Student Support Manager, Sarah Marshall, Assistant Headteacher, Personal Development and Welfare and David Chamberlain SENDco. All year heads are Level 2 Safeguarding trained.

The Designated and Deputy Safeguarding Leads (DSL and DDSL) will carry out their roles in accordance with Keeping Children Safe in Education 2025..

The DSL/DDSL will undergo the appropriate Safeguarding Training to provide them with the knowledge and skills to carry out their role. This training should be updated at least every 2 years, in line with the Staffordshire Safeguarding Children's Board requirements.

In addition to the formal training, their knowledge and skills are refreshed at regular intervals, at least annually, through the termly SCC DSL Briefings, weekly ESAS emails, meeting other DSL's, emails and reading statutory guidance. The training provides DSL/DDSL's with a good understanding of their own role, the processes, procedures, and responsibilities of other agencies, particularly children's social care.

The DSL continually develops an understanding of the community the school serves, the risks and resilience. PCSOs are essential in keeping in touch with issues which arise in the community. Many of our staff live in the local community and keep us abreast of the community.

#### **Specific training for all staff**

- At Sir Graham Balfour we have a robust Safeguarding training schedule for all staff (see below), which is monitored by the DSL. All staff receive annual Level 1 Safeguarding training, as required in KCSIE 2025, and receive regular updates through staff meetings, briefings, emails etc. to develop and support robust safeguarding practices amongst all staff. The Level 1 Safeguarding Training will take place during the first half term with mop ups for staff who are unable to attend the first day. Safeguarding training is part of the Induction Schedule and sessions are run for Trainee Teachers. A half termly newsletter is prepared for both parents and staff. Updates appear in the Staff Bulletin.
- The school has **clear induction processes** for all staff, volunteers and Governors, and all required documents and policies are provided both at induction of new staff, and on a yearly refresh basis for current staff. These documents include Part 1 of KCSIE 2024 (staff sign to say that they have read and understand at part of the appraisal process); Code of Conduct; Achievement and Positive Behaviour Policy.

## **Safeguarding CPD 2025-26**

September

Level 1 Safeguarding for all

Weekly Staff Bulletin

7-minute briefings

PDW Friday meetings

Safeguarding and long-term absenteeism (roles in school)

Child's Voice

Daily Lived Experiences including parental behaviour (use poster Voice of the Child)

Role of the Virtual School Head – Lesley Gill and Deputy Joy Oakes

PDW meeting 1

AI-generated child sex abuse material

PDW meeting 2

Operation Encompass

PDW meeting 3

How children talk to them in different ways (verbal/non-verbal/behaviour/attendance) and the importance of recording the information

PDW meeting 4

Hackett Tool

PDW meeting 5

Prevent

PDW meeting 6

Staffordshire Serious Violence Strategy

## **Online monitoring systems**

recognises the range of issues that have arisen due to the increased use of the internet and social media. Therefore, the following takes place as pro-active methods to counter inappropriate use of the internet and social media.

- We use SENSO as a method to identify inappropriate internet searches of a sexual nature, violent nature, suicidal nature etc.. Any concerns are sent directly to My Concern which are acted upon by the DSL or DDSLs.
- The DSL and DDSL have access to SENSO so we can search an individual's internet searches if we have any concerns about students.
- Online safety is a theme that runs through the Online Safety Policy, The Staff Code of Conduct and the Achievement and Positive Behaviour Policy.
- Online safety is taught through the Computing Curriculum, RSE and PSHE lessons.
- Parents are updated regarding Online Safety via the Safeguarding newsletter.
- The DSL conducts an annual review of online systems and issues relating to inappropriate online usage to ensure that practice is responding to need.

The people you should talk to in school are:

Role in school	Name	Contact Number
Designated Safeguarding Lead (DSL)	Sharon Metcalfe	01785 223490
Deputy Designated Safeguarding Leads (DDSL)	Rachel Norman Sarah Marshall David Chamberlain	01785 223490
Chair of Governors	Mike Winkle	mwinkle@sirgrahambalfour.staffs.sch.uk

## **Appendix 10**

### **Useful Safeguarding links**

There are also a number of other useful links in KCSiE 2025 on pages 163 to 170 regarding the topics of abuse, bullying, children missing from education, home or care, children with family members in prison, child exploitation, confidentiality, drugs, FGM and forced marriage, health and well-being, homelessness, information sharing, online advice – including online safety, private fostering, radicalisation, serious and sexual violence, specialist organisations, harmful sexual behaviour, support for victims, useful toolkits, sharing nudes and support for parents/carers.

#### **NSPCC**

- [Harmful sexual behaviour \(HSB\) NSPCC Learning](#)
- [Keeping children safe online-online safety/sexting/sending nudes](#)

#### **National Contacts**

- CEOP (Child Exploitation and Online Protection) [CEOP Safety Centre](#)
- Professionals Online Safety Helpline – 0844 381 4772 [Safer Internet Helpline](#)
- Internet Watch Foundation (IWF) – [Internet Watch Foundation](#)
- Safer Internet Centre – [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- Childline – 0800 1111 [Childline](#)
- Ofsted – General enquiries: 0300 123 1231  
About Schools: 0300 123 4234  
Concerns: 0300 123 4666  
e-mail: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)
- HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders) [www.educateagainsthate.com](http://www.educateagainsthate.com)
- **NSPCC Harmful Sexual Behaviour project: 0844 892 0273**

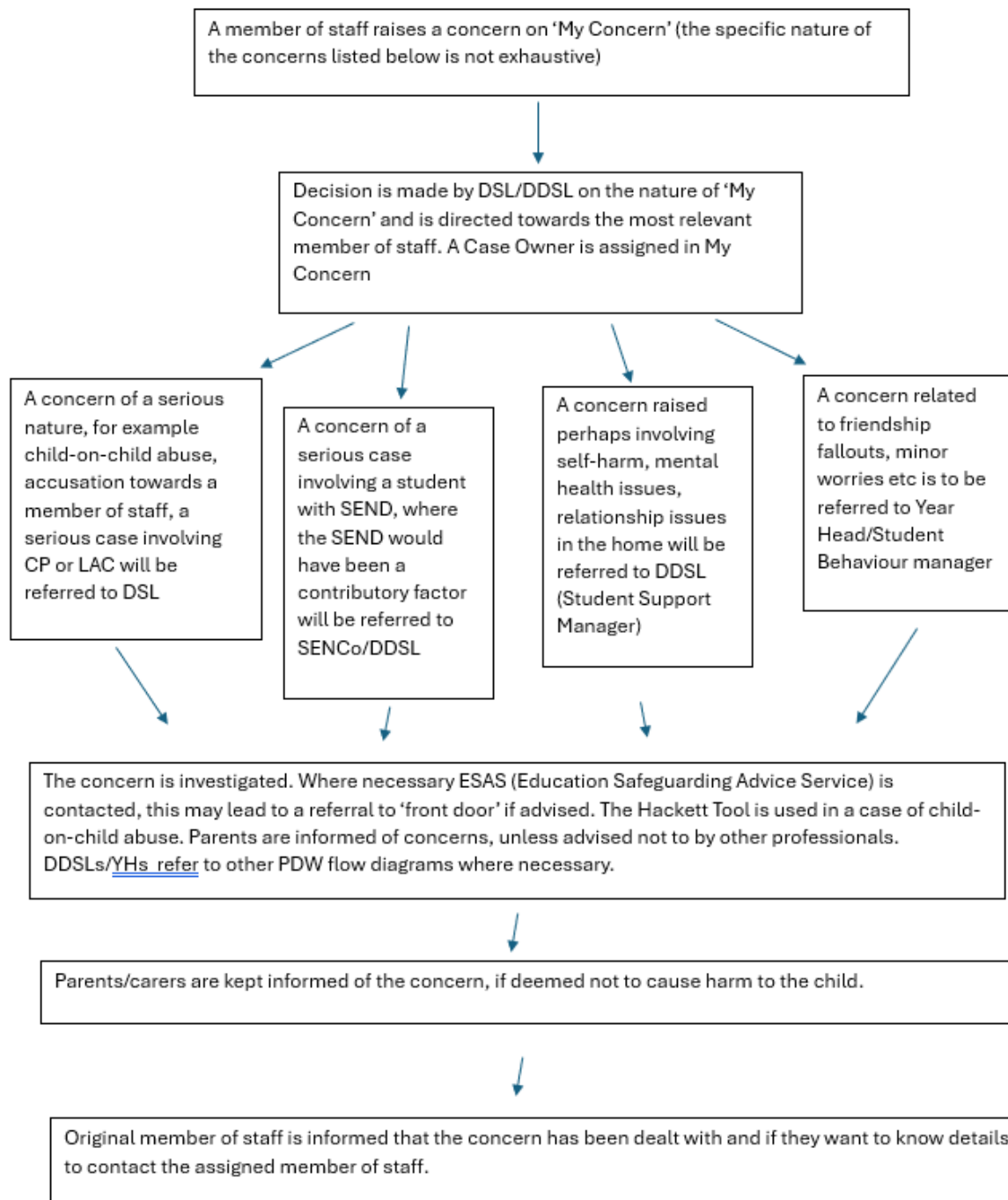
#### **Useful websites**

- Staffordshire Safeguarding Children Board [StaffsSCB](#)
- Child Exploitation and Online Protection Centre (CEOP) – [Ceop-Police](#) & [knowaboutcse](#)
- NSPCC – 24-hour Child Protection Helpline 0808 800 5000  
[NSPCC](#)
- Women's Aid - 24 Hour Helpline: 0870 2700 123
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999. [Unicef](#)

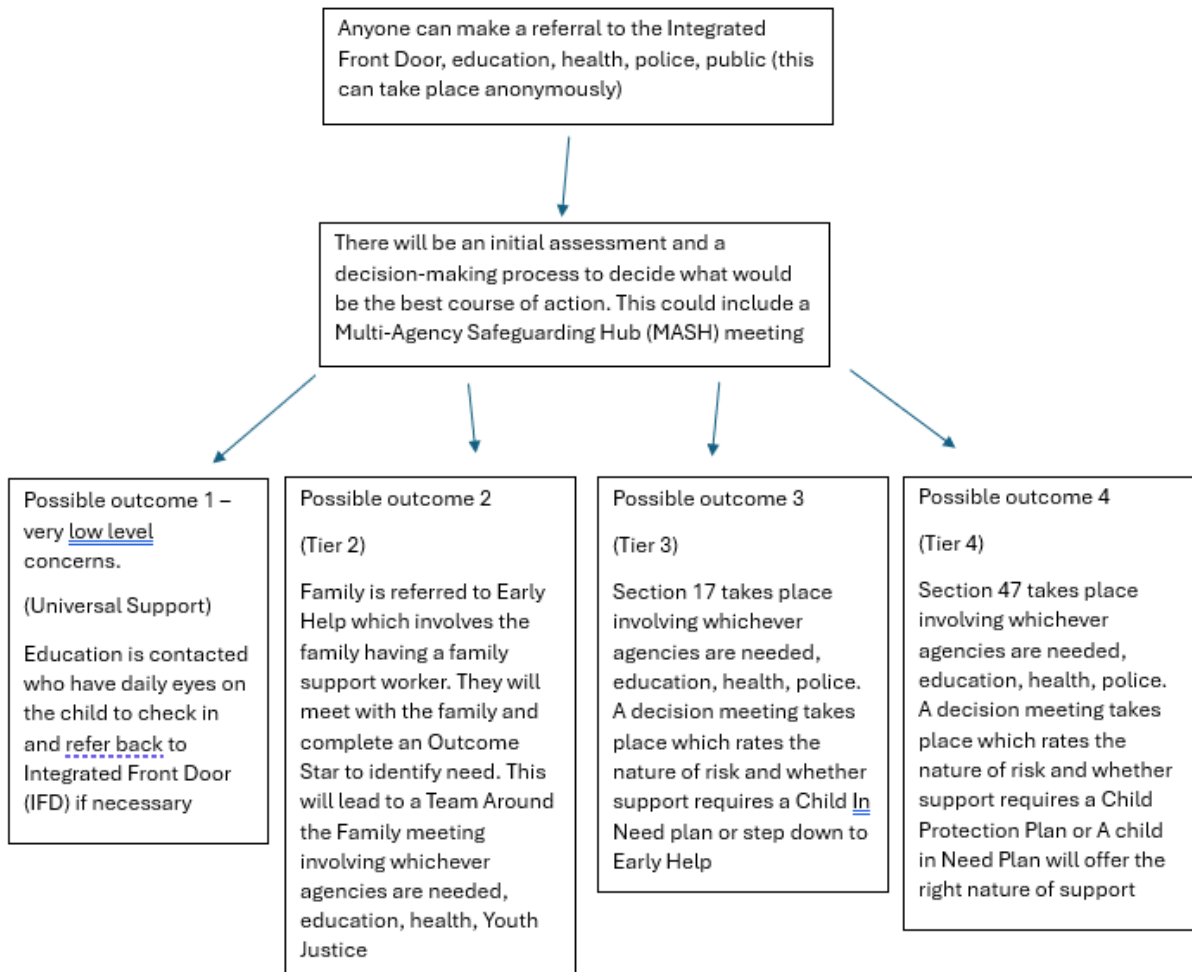
## **Appendix 11**

## Useful Flow Diagrams

### What happens when a concern is raised on My Concern

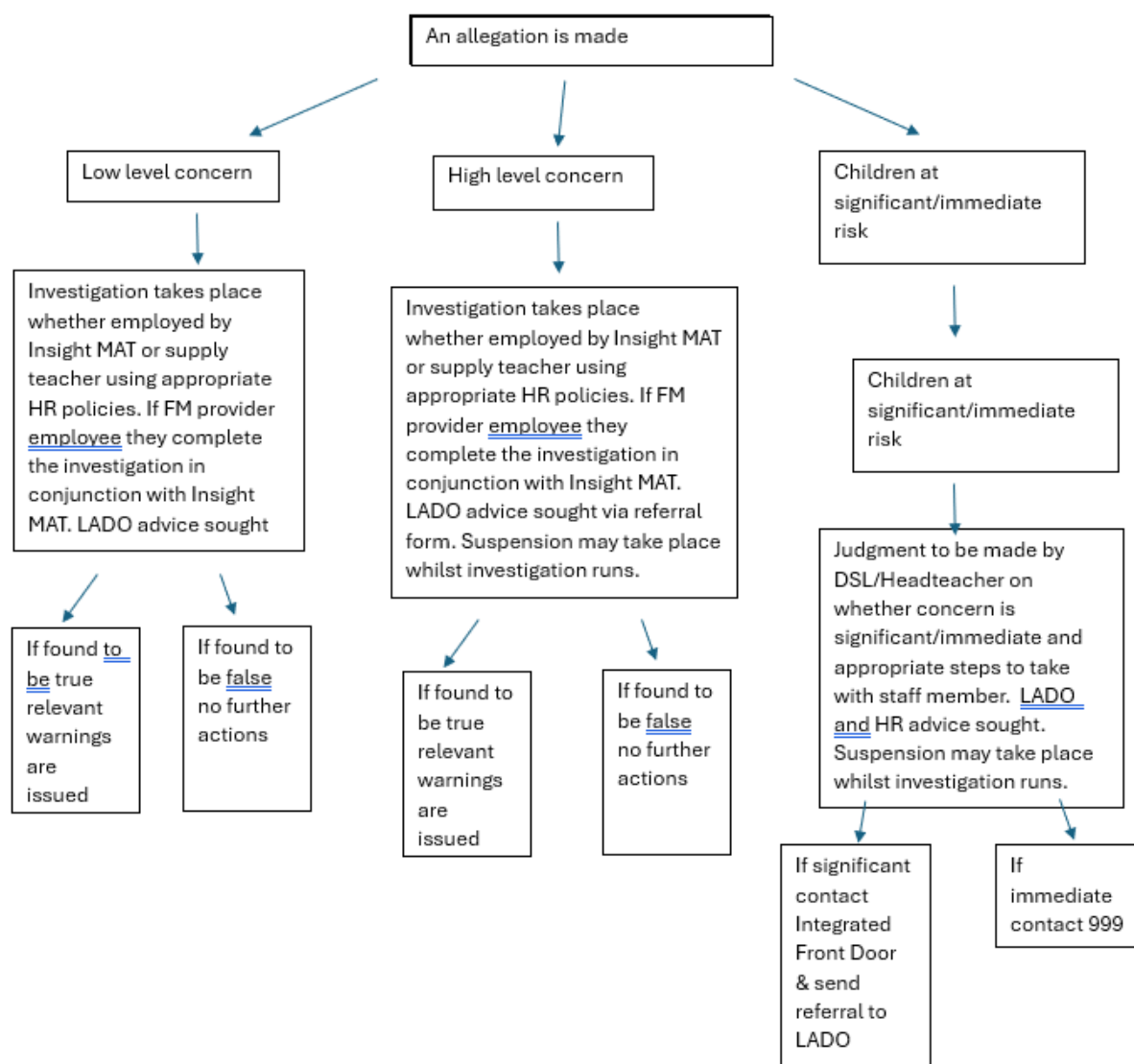


**What happens when a referral is made to services and potential outcomes.**





**What happens when an allegation is made about a member of staff, including low level concerns.**



**What happens when child-on-child abuse allegation is made.**

